

Committee	STRATEGIC PLANNING COMMITTEE	
Report Title	FAIRCHARM TRADING ESTATE , CREEKSIDE, SE8 3DX	
Ward	New Cross	
Contributors	Gemma Barnes	
Class	PART 1	Date: 02 MAY 2013.

Reg. Nos. (A) DC/12/82000
(B) DC/13/83250

Application dated 21.11.2012, submitted 26.11.2012
completed 10.12.2012 and revised
31.01.2013
14.02.2013
19.03.2013
02.04.2013
08.04.2013

Applicant Tibbalds Planning and Urban Design on behalf
of Workspace PLC

Proposal

(A) DC/12/82000 - The partial demolition, remodelling, repair, restoration and conversion of Blocks A and C to provide 4,310sqm of mixed commercial floorspace (Block A: 1,786sqm of commercial (Class B1) floorspace and 397sqm of Class B1/B2 floorspace and Block C: 2,127sqm of commercial (Class B1) floorspace) with associated plant, servicing and storage. Demolition of Building B and the construction of four new buildings ranging from 6 to 12 storeys to provide 148 residential units (63 x one-bed, 68 x two bed and 17 x 3 bed), and new commercial uses (779 sqm of Use Class B1) together with new open space, landscaping, car and cycle parking development at Faircharm Trading Estate, Creekside, SE8 3DX.

(B) DC/13/83250 - Conservation Area Consent for partial demolition of Buildings A and C and complete demolition of Buildings B and D at the Faircharm Trading Estate, Creekside, SE8 3DX

Applicant's plans and other document submitted with the application 204_A_P_001_02, 03, 10,11, 12;
204_A_P_002_01;
204_A_P_003_01, 02 received 26.11.2012

204_A_P_100_11B, 12B, 100B, 101B, 102B,
103B, 105B, 106B, 200B, 201B, 202B, 203B,
204B, 206B, 207B, 300B, 301B, 302B, 303B,
400B, 401B, 402B, 406B, 413B;
204_A_P_200_11A, 101A, 102A, 201A, 202A,
301A, 401A, 402A;
204_A_P_300_11A, 101C; 102B, 104B, 105B,
106B, 202B, 204B, 301B, 303B, 304B, 305B,
401B, 402B, 403B, 404B;
204_A_P_400_01A, 03, 04, 05, 06, 11, 12, 13,
14, 15;
204_A_P_410_01, 02, 03;
204_A_P_415_01, 02;
204_A_P_440_01;
204_A_P_445_01 received 19.03.2013

204_A_P_100_10E received 21.03.2013

204_A_P_100_01B, 13C, 14D, 306C, 307C;
204_A_P_200_12B, 302B;
204_A_P_300_01B, 12B, 101C, 201C, 103C,
203C, 205C, 302C;
204_A_P_400_01A, 02A received 08.04.2013

Supporting Statements/Documents

Site Boundary – FCQ02 (November 2012)

Design and Access Statement - FCQ03
(November 2012)

Addendum to the Design and Access Statement
(March 2013)

Additional Site Views (January 2012)

Materials (April 2013)

Revised Application Drawings: Lifetime Homes
and SELHP (March 2013)

Accommodation Schedule (08.04.13)

Planning and Planning Obligations Statement –
FCQ04 (November 2012)

Transport Assessment - FCQ6a (November
2012)

Framework Travel Plan - FCQ06b (November
2012)

Residential Travel Plan - FCQ06c (November
2012)

Final Transport Assessment and TP Review
Report (January 2013)

Transport Assessment Additional Information:
Sensitivity Testing Report (March 2013)

Draft Car Parking Management Plan (March
2013)

Revised Energy Strategy – FCQ07a (March
2013)

Revised Sustainability Statement – FCQ07b
(March 2013)

Regeneration Statement – FCQ08 (November 2012)

Affordable Housing and Viability Statement – FCQ09 (November 2012)

Flood Risk Assessment - FCQ10 (November 2012)

Environmental Statement

FCQ05b - Environmental Statement Vol.1: Main Document (November 2012)

FCQ05c – Environmental Statement Vol 2: Figures (November 2012)

FCQ05d – Environmental Statement Vol 2: Townscape and Visual Impact Assessment (November 2012)

FCQ05e - Environmental Statement Vol.4: Appendices (November 2012)

Environmental Statement Addendum Non-Technical Summary (March 2013)

Environmental Statement Addendum Volume 2 – Appendices (March 2013)

For Information Only (not to be stamped as approved)

Drawings nos. FCH/401A, 402A, 403A, 405A, FCH001E

FCQ03a – Landscaping and Public Realm Statement (November 2012)

Landscape and Public Realm Creek Edge Clarifications (March 2013)

Creekside Education Trust: Landscape and Ecology Advice (prepared October 2012 submitted 31.01.2013)

Background Papers

- (1) Case File DE/124/E/TP
- (2) Adopted Unitary Development Plan (July 2004)
- (3) Local Development Framework Documents
- (4) The London Plan (July 2011)
- (5) NPPF (2012)
- (6) Town and Country Planning (Environmental Impact Assessment) Regulations 2011
- (7) North Lewisham Links (2007)
- (8) Local Meeting Notes (February 2013)

Designation

Local Employment Location, Deptford Conservation Area, PTAL 4, Flood Risk Zone 2/3, Local Open Space Deficiency, Area of Archaeological Priority, Strategic Viewing Corridor Blackheath Point to St Pauls, Adjacent to Site of Nature Conservation Importance

EIA

The development is considered to fall within Schedule 2, Category 10b (urban development project) of the EIA Regulations. Consequently an EIA is required.

A Scoping Opinion pursuant to Regulation 13 of the Regulations was issued in December 2011.

This application is accompanied by an Environmental Statement together with an Addendum to the Environmental Statement.

1.0 Introduction

1.1 Purpose of the Report

1.1.1 The submission of this application follows extensive pre application discussions between the Council and Workspace regarding development opportunities for this site.

1.1.2 On 21/11/2012 the Council received an application for full planning permission and conservation area consent made by Tibbalds Planning and Urban Design on behalf of Workspace PLC for the redevelopment of the site comprising refurbishment of Buildings A and C, demolition of Buildings B and D and erection of four new buildings on site to provide 5,089 (GEA) of commercial floorspace and 148 enabling residential units.

1.1.3 In response to issues raised by the Council, Statutory Consultees and third parties during the consultation period, the proposed development was subsequently amended. The amendments included:

- An addendum to the Environmental Statement (Ecology/Daylight and Sunlight/Transport Chapters);
- Revised landscape proposals;
- Revised design of the ecological fenders;
- Revised internal layout for the wheelchair units;
- Revised internal layout for the one bedroom units to improve daylight/sunlight;
- Inclusion of B2 Use Class floor space within Building A;
- Clarification of the amount and location of photovoltaic panels and living roofs;
- Additional transport data;
- Additional local views;
- Additional overshadowing information;
- Additional information regarding the fit-out of the refurbished commercial buildings.

1.1.4 Given the significance of the amendments a re-consultation was undertaken on 27th March 2013.

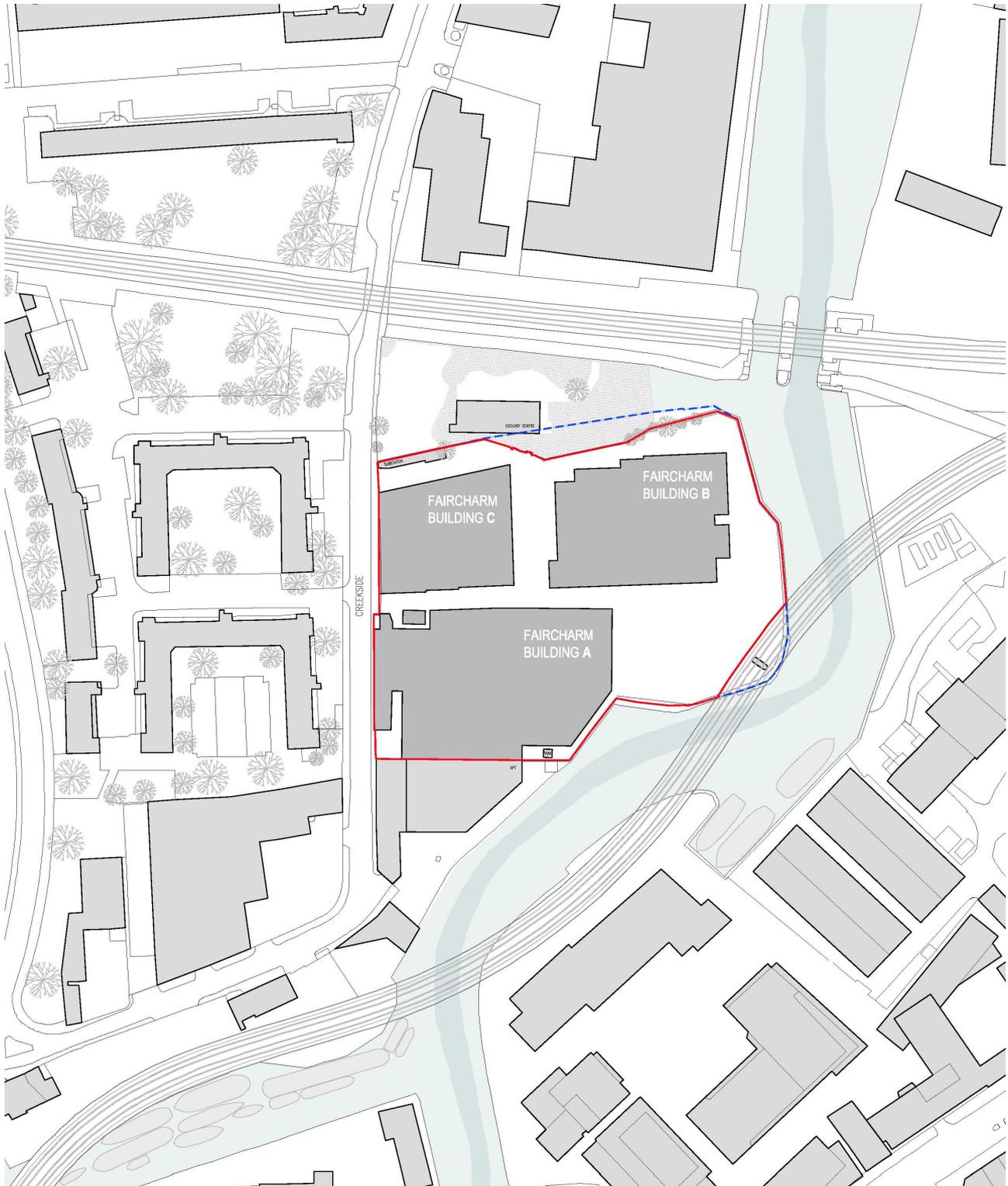
1.1.5 This report considers the proposals (as amended) in light of relevant planning policy and guidance, representations received and other material considerations, and makes recommendations on the determination of the application.

2.0 Application Site and Surroundings

- 2.1.1 The site, known as Faircharm Estate, is a 0.97 hectare site located in Deptford, in the north of the Borough. The site is located on the eastern side of Creekside close to the railway viaduct which essentially divides Creekside into north and south sections.
- 2.1.2 The site contains three large inter-connected factory buildings operated by Workspace, comprising approximately 12,000 sqm GEA (9,300 sqm NIA) of floorspace for light industrial and business uses.
- 2.1.3 The existing buildings date from the late 1940s, 1950s and early 1960s (Building B) and include a variety of workshop and warehouse buildings that illustrate the spread of development from the street into the depth of the property towards the waterfront, seeking maximum coverage whilst respecting the historic yard/wharf. The warehouses were once occupied by the Lewisham based company Zenith Carburettors whose name still appears at the front.
- 2.1.4 The buildings are built in red brick with large metal windows and pitched roofs, except for Building B which is flat roofed. The heights vary between two and three and a half storeys. The Faircharm Estate provides an interesting and coherent group of industrial buildings to the area.
- 2.1.5 Building A consists of two parts, built in two stages. The older part at Creekside dates from the 1950s and comprises three conjoined warehouses whose gables feature prominently in the streetscene. The most northern warehouse has a gable end chimney stack. The range was later extended in the 1950s (also called Building D) right up to the edge of Creek, possibly as the result of Zenith occupying the site, creating the large unobstructed warehouses type for assembly favoured by the car manufacturing industry.
- 2.1.6 Building B occupies the north-eastern part of the site and was the last building to be added to the site in the late 1950s/early 60s. By virtue of its location and scale, it exerts a great presence towards the Creek. Built in the modern functional style of its period, it is in massing and height a notable deviation from the other industrial buildings in the area. Although it reflects the traditional palette of materials, due to its large footprint and boxy appearance the building lacks the townscape interest created by the more traditional conjoined warehouses on the site and elsewhere in the area.
- 2.1.7 Building C consists of three conjoined traditional 2-storey warehouses standing parallel to the road. Their gables feature prominently in views from the road across the Creekside Education Centre. The warehouse fronting the street is the oldest part, dating from the late 1940s. It has tall metal workshop windows with white painted lintels and first floor banding. The red brick is laid in a traditional English bond. The two warehouses behind project slightly, with slanted elevations to take account of the route of the northern access. The second, narrower warehouse is linked to Building A by a bridge which provides a focal point in the view from the street into the site.
- 2.1.8 The Creekside ground floor façade is largely blank save for the 'reception' entrance into Building A, the loading bay at Building A and two gated vehicular access points. This makes the site appear rather impenetrable from Creekside.

2.1.9 The external spaces within the site have all been hard surfaced to provide vehicular access and to the rear (adjacent to the Creek) the site provides parking for approximately 60 vehicles.

2.1.10 There is an historic water tower in the southeast corner of the site which is to be retained.



Existing Site Plan

2.1 The Surrounding Area

- 2.1.1 The surrounding area is mixed in character, including local authority estates, commercial and industrial uses.
- 2.1.2 Immediately to the north of the site is the Creekside Ecology Centre built on the former Transco site. The education centre comprises a modern, single storey building constructed of sustainable materials with a living roof. The external space is used as an educational ecology area with direct access into the Creek. The centre opened in 2002 and is a valuable community resource offering education facilities within the building as well as controlled access into the Creek.
- 2.1.3 To the north of the Creekside Ecology Centre is the railway line. The Grade II Listed historic viaduct of the London-Greenwich railway line is an attractive brick structure of monumental quality comprising 32 arches from the Creek to Church Street, most of them open and topped with parapets that enclose the rail tracks to both sides. The section that runs immediately to the north of the Faircharm site comprises enclosed railway arches that front onto a pedestrian route (Mechanics Path) crossing over Ha'Penny Hatch Bridge, leading into Greenwich.
- 2.1.4 The present Ha'Penny footbridge was built in 2002 to re-instate the historic pedestrian and carriage link between the two boroughs in this location. Historically, it was a toll bridge costing half an old penny (Ha'Penny) to cross. The previous wooden bridge was demolished some time in the 1930s.
- 2.1.5 The vertical lifting bridge next to Ha'Penny Hatch is one of the most imposing structures within the area, notably in long views from the DLR or from the Laban Centre. It was opened in December 1963 replacing a late 19th century draw bridge. The modern bridge is the third bridge in this location - like its predecessors it had to open to maintain the right of navigation on the Creek for masted boats. The lifting structure consists of four 20 metre high square steel columns that contain the lifting hoists and counterweights, one pair on either side of the channel. Unfortunately, the bridge was welded shut in the late 1970s.
- 2.1.6 To the north of the railway line there is a Scaffolder's yard and further beyond that Cockpit Arts, which provides studio and gallery space for small and medium sized creative industries. Further north on the east side of Creekside there are other commercial sites whilst the west side of Creekside accommodates residential properties and Ferranti Park.
- 2.1.7 Deptford Creek runs alongside the site to the east and south east. The Eastern side of the Creek falls within the boundary of Greenwich. The Creek forms the northern part of the River Ravensbourne where it meets the River Thames. It runs in a winding course from Deptford Bridge in the south, to the Thames in the north and, in contrast to the Ravensbourne further south, it is deep and tidal. The frontages are revetted throughout with a variety of materials, but principally with timber fendering, brick and steel piles.
- 2.1.8 Most of the course of the Creek is screened by buildings and walls and thus has little presence in the public realm in Creekside. The occasional glimpse can be gained via the yards of Theatre Wharf and Evelyn Wharf, usually only during daytime when the gates are open. An extensive view of the Creek can be obtained from the Ha'Penny footbridge.

Since the docks and wharfs are no longer in use, the Creek has become an area of tranquillity, it accommodates a number of houseboats and is a protected Site of Nature Conservation Importance. It has been a longstanding objective to enhance public access to the Creek and therefore opportunities to do this must be taken up when development proposals come forward.

- 2.1.9 In 1996 the Dockland Light Railway (DLR) was extended across the Thames to Lewisham. The line criss-crosses the southern part of the Creek four times, mirroring the route of the river in the opposite direction. It runs over the south east corner of the Faircharm site.
- 2.1.10 On the eastern side of the Creek within Greenwich Borough there are a number of modern, high density developments recently constructed and a number still under construction.
- 2.1.11 Directly to the south is Harold Wharf, a 3-storey brick built building with modern single storey, fully enclosed front extension. The building occupies nearly the entire depth of its plot save for a small yard adjacent to the Creek. The building is used as art space known as the APT Studios. The building provides both studios and gallery space for exhibitions.
- 2.1.12 To the west of the site on the opposite side of Creekside is part of the Crossfields Estate. The Crossfield Estate consists of a total of nine apartment blocks separated by Church Street and the Railway Viaduct into three separate entities. The first group of buildings to be constructed between 1937 and 1939 were the five blocks south of the railway line east of Church Street, it is these blocks which are closest to the Faircharm Estate. They consist of two U-shaped 5-storey blocks, Wilshaw and Holden House west of Creekside, and three 5-storey linear blocks along Church Street (Cremer, Castell and Brown House)
- 2.1.13 The buildings have been designed with open decked access to all upper floors, the ground floor flats have small areas of external amenity space created by the low front boundary walls. The main vehicular access is from Creekside via two lanes north and south of Holden House leading to the central cul-de-sac. Residents benefit from generous, uncontrolled private parking.
- 2.1.14 The nearest part of the Transport for London Road Network (TLRN) is the A2 Deptford Broadway. The nearest part of the Strategic Road Network (SRN) is the A200 Creek Road. Both these roads are just under 500 metres from the site. They are linked by Deptford Church Street, off which is Creekside, which is directly adjacent to the site as is and the only access road for the site. Both these roads are part of the Borough highway network.
- 2.1.15 Creekside forms part of National Cycle Network route 21, however the road is a poor environment for cyclists and pedestrians. Footways are narrow, there are many pot holes and on-street parking and servicing associated with the adjacent industrial and residential units can be obstructive. Creekside is also heavily used as a short cut between the A2 and A200.
- 2.1.16 A number of bus routes pass within walking distance of the site, as is Deptford National Rail station and the separate Deptford Bridge DLR station. The site records a public transport accessibility level (PTAL) of 4, on a scale of 1 to 6, where 6 is the highest, so access to public transport can be considered to be 'good'.

- 2.1.17 The site falls within the Deptford Creekside Conservation Area, designated in 2012 although none of the buildings are statutory or locally listed. There are 3 other conservation areas within 1000m of the site (St Pauls, Deptford High Street and Ashburnham Triangle Conservation Areas). There are also a number of Grade II Listed Buildings within 500m of the site (Deptford Pumping Station, Mumford Mills and Miller General Hospital).
- 2.1.18 The site lies within the Strategic Viewing Corridor of Blackheath Point to St Pauls Cathedral which also encompasses St Pauls Church, Deptford.

3.0 Planning History

- 3.1 **DC/83/21943:** The use of Unit 7 as a sound recording studio. Granted.
- 3.2 **DC/87/26403:** The use of Unit 112 as an office storage area and rehearsal studio for the Dagarti Arts Company. Granted.
- 3.3 **DC/92/35446:** The change of use of Unit B5, Building B to a photographic chemical processing facility (Use Class B4). Granted.
- 3.4 **DC/93/37187:** The use of Units A110, A112 and A114 as a gymnasium. Granted.
- 3.5 **DC/99/44498:** The installation of external ducting on the south facing elevation of Unit B112 SE8 at first floor level to a metre above roof level. Granted.
- 3.6 **DC/00/47693:** The use of the existing WC accommodation and tea room on the ground, first and second floors of Building B as B1 (Business) and B8 (Storage). Granted.
- 3.7 **DC/00/47891:** Change of use of Unit A05 to a café (Use Class A3). Granted.
- 3.8 **DC/00/46032:** The use of Unit 3 as a cafeteria (Class A). Granted.
- 3.9 **DC/00/46444:** The installation of an external extract duct on the flank wall of Unit C2. Granted.
- 3.10 **DC/01/49678:** The installation of a shopfront at Unit A05. Granted.
- 3.11 **DC/07/65281:** The installation of 3 new UPVc double glazed windows to the Creekside Elevation of Faircharm Trading Estate. Granted.
- 3.12 **DC/10/75983:** The change of use of unit A5A to a cafe (Use Class A3). Granted.

4.0 Current Planning Applications

The Proposals

- 4.1 Planning permission and conservation area consent is sought for redevelopment of the site for mixed use employment and residential purposes. Buildings A and C would be refurbished to provide more efficient and high quality commercial units. Refurbishment of the buildings would include the creation of large

courtyards. Substantial demolition of parts of the buildings are required to facilitate the creation of the courtyards. Buildings B and D would be demolished entirely to make way for the erection of four new buildings that would accommodate commercial floorspace on the ground floors and 148 residential units on the upper floors.

- 4.1.1 The redevelopment would provide 5,089 sqm Gross External Area (GEA) of commercial floorspace. It is important to note that this equates to 4,754 sqm Gross Internal Area (GIA) and 3,373 Net Internal Area (NIA). It is proposed that 4,692 sqm GEA would be for B1 Use Class and 397 sqm GEA would be for B1/B2 Use (B2 floorspace identified in Building A). The purpose of the refurbishment of the existing buildings is to maximise the use of the space whilst providing more flexible units in terms of size with high quality services and utilities and a better environment in terms of natural light, ventilation and climate control.
- 4.1.2 Residential development is proposed in the form of 148 residential units comprising 63 x one beds, 68 x two beds and 17 x three beds.
- 4.1.3 It is proposed to undertake a 'light touch' approach to the refurbishment of the existing buildings in order to retain their architectural integrity and historic character. However, in order to address the problems associated with deep floor plates and lack of natural light it is proposed to demolish parts of Buildings A and C to create courtyards that would enable all units to be provided with natural light and ventilation and self contained access. The courtyards would provide valuable communal space for use by the businesses for day to day networking, breaks and other such activities as well as providing space for events and exhibitions.

Site Layout

- 4.1.4 Four new buildings would be erected behind Buildings A and C in the space currently occupied by Building B and the car park. The existing vehicular access would be retained providing the central route through the site between Buildings A and C. This route referred to as the 'shared street' would provide a level shared access for pedestrians, cyclists and vehicles with no delineation between pavement and road. The shared street would reach a crossroads just beyond Buildings 01 and 02 (in the centre of the site) whereby access to car parking, shared communal space within the site and the Creek edge would be to the east and south; and vehicles would exit the site on a one-way system to the north between Buildings 02 and 03 (known as the residential street), vacating the site behind Building C via the existing vehicular exit point.
- 4.1.5 It is proposed to provide communal space within the site to the south and east of Buildings 03 and 04 adjacent to the Creek edge. This space would be accessible to commercial and residential occupiers as well as members of the public. The space would comprise a mix of hard and soft landscaping and would include natural play equipment for children as well as a raised viewing platform to provide views into the Creek. The raised viewing platform would be constructed from an existing external staircase within the site.

- 4.1.6 The new site layout would provide 28 car parking spaces, 15 of which would be DDA spaces for the wheelchair units, 1 DDA space for the commercial units together with 5 motorbike parking spaces, 3 loading bays and 210 cycle parking spaces.
- 4.1.7 The existing water tower located to the rear of Building C would be restored and potential future uses explored.



Proposed Ground Floor Plan

Building A

- 4.1.8 It is proposed to remove a single storey modern addition to Building A in order to widen the pavement to 2.0m. A replacement single storey contemporary flat roofed extension would be erected on the front elevation of Building A. The extension would be constructed of brick with large areas of glazing and a biodiverse living roof. The large glazed panels would animate the Creekside street frontage whilst providing opportunities for views into the building and the courtyards beyond, as well as providing natural surveillance to Creekside during the day and evening. Perforated/textured brick would be utilised to add visual interest to the Creekside façade. An external terrace would be incorporated to the southern end of the café which would also create a level of activity in this part of Creekside.

- 4.1.9 An open internal courtyard would be created on the eastern side of Building A resulting in a 'U Shaped' structure on a north-south axis. The building would comprise 16 units of varying size set out over two floors although the internal layout of units can be altered easily to accommodate user requirements. It is proposed to provide 'Club Workspace' within part of the ground floor of the building, behind the café. Club Workspace is a flexible space that members can utilise for meetings and as an office area on an ad-hoc basis subject to a hire fee. The lobby/reception for the commercial floorspace and site security office would be located within this building adjacent to the entrance route into the site, which would enhance legibility and permeability through the site.
- 4.1.10 Existing windows would be repaired and where necessary replaced. New windows and doors would be inserted where required and redundant openings would be in-filled with reclaimed bricks to match the existing. It is proposed to repair existing brickwork where required and new high quality brickwork would be used to create the courtyard. The existing roof would be replaced with an insulated aluminium profiled roof with the insertion of industrial sized rooflights. A metal external deck would be erected within the courtyard to provide access to the first floor rear facing units.

Building C

- 4.1.11 An enclosed internal courtyard would be created on the eastern side of Building A resulting in a 'U Shaped' structure on a east-west axis. The courtyard would be enclosed with a glazed light weight, pitched roof structure. The building would comprise 24 units of varying size set out over two floors although the internal layout of units can be altered easily to accommodate user requirements. Existing windows would be repaired and where necessary replaced. New windows and doors would be inserted where required and redundant openings would be in-filled with reclaimed bricks to match the existing. It is proposed to repair existing brickwork where required and new high quality brickwork would be used to create the courtyard. The existing roof would be replaced with an insulated aluminium profiled roof with the insertion of industrial sized rooflights. A metal external deck would be erected within the courtyard to provide access to the first floor rear facing units and also a bridge link to Building C.
- 4.1.12 Save for the creation of the courtyard the most significant change to Building C would be to the ground floor front façade. It is proposed to insert eight windows at ground floor level in order to add natural light to the front facing units and to provide animation to Creekside at this point. The windows have been designed with large fixed pane metal panels and deep metal recesses to add depth and character to the front elevation.

New Buildings

- 4.1.13 It is proposed to erect four new buildings towards the rear of the site. The new buildings have been designed to step up in height as you move through the site towards the Creek ranging in height from 6-12 storey's. Buildings 01, 02 and 03 have been designed with pop-up roof elements of varied size, form, fenestration treatment and materiality to help break up the mass of the buildings. The setbacks created by the pop-up roof elements would be utilised to provide balconies and terraces for the residential units on the top floors. Buildings 01, 02 and 03 have projecting balconies that also help to break up the mass and articulate the elevations. Building 04 is the tallest building on site, it has been designed with a

flat roof with no pop-up or setback. The building has a vertical emphasis with recessed balconies and cut-out/set back element on the northeast corner (from 6th floor upwards) to address the Strategic Viewing Corridor.

- 4.1.14 The materials palette comprises five types of bricks including the existing brick on Buildings A and C, a white brick for the internal courtyards of Buildings A and C and a range of grey/blue/purple/brown tone bricks for the new buildings. Detailed brick specifications for a range of options have been provided and viewed on site. The general approach is supported although the actual brick to be used on each building would be determined as part of the conditions. In addition to brick the materials palette comprises perforated corten steel (external walkways and stairs), profiled copper sheet cladding (roof level of new buildings), profiled aluminium for the roofs of Buildings A and C, stainless steel grilles, exposed concrete structure/beams, concrete tiles, concrete bricks and spandrel panels. A mix of steel, timber and powder coated composite fenestration would be used throughout the site. Metal doors would be used for the commercial elements and timber for the residential elements as a defining language for each use. Perforated and hit-and-miss brick skins would be used to add texture and depth to the facades.
- 4.1.15 Buildings 01, 02 and 03 would have biodiverse living roofs whilst Building 04 would accommodate 133sqm of PV panels on the roof. The proposed hard surfacing materials comprise axo-gold and granite which would be used throughout the external spaces as well as in the residential lobbies.
- 4.1.16 Building 01, a rectangular building with footprint measuring 16m x 31m would be erected behind Building A with a gap of 3.0m (at the northern end) and 2.0m (at the southern end). The 6 storey building (26.50 AOD above ground level) would accommodate two double height commercial units on the ground floor with 25 residential units on the upper floors. The commercial units measure 53 sqm and 172 sqm.
- 4.1.17 Building 02 is a roughly rectangular building (with 45 degree slant on the rear elevation) with footprint measuring 16m x 27m. This building would be erected as an extension to Building C albeit set back from the southern building line of Building C by 6.0m and the northern building line by 2.0m. The 7 storey building (28.0 AOD above ground level) would be in entirely residential use accommodating 21 residential units comprising maisonettes on the ground and first floor with flats above. This building would accommodate all of the affordable housing units.
- 4.1.18 Building 03 is an L-Shaped building with footprint measuring 24m x 31m. This building would be located to the east of Building 02 albeit with a gap of 14m to facilitate the 'residential street' which would accommodate car parking and vehicular access out of the site. This building would be closest to the Creek with a distance of 6.8m being retained between the east elevation and the Creek, at the nearest point. A distance of minimum 8.0m would be retained between the building and the northern boundary shared with the Ecology Centre. The 7 storey building (28.35 AOD above ground level) would accommodate two double height (95 sqm) commercial units on the ground floor facing the shared communal space within the site as well as 43 residential units set out as maisonettes on the ground and first floors and flats on the upper floors.

- 4.1.19 Building 04, a roughly square building with footprint measuring 25m x 23m would be erected to the east of Building 01 with a gap of 13m being retained for car parking and vehicular access. This building would be set back from the southern Creek edge by 6.5m and the eastern Creek edge by 5.0m. This is the tallest building on site being 12 storeys (46.50 AOD above ground level). The building would accommodate the site energy centre as well as two double height (85 sqm and 176 sqm) commercial units on the ground floor with 59 residential units on the upper floors.

Supporting Documents

Planning Statement (Tibbalds)

- 4.2 The planning statement describes the site surroundings and relevant background, which includes a heritage assessment for the site as well as the policy context for the proposal. The statement then goes on to describe the development and its planning considerations and sets out the extent to which, in the Applicant's view, the proposal complies with planning policy. The statement includes a discussion in respect of delivery, phasing and planning obligations concluding with the key benefits of the scheme.
- 4.3 The statement includes a Feasibility Study for the refurbishment of the existing buildings (undertaken by GL Hearn). The study sets out the condition of the existing buildings, what works would be required to refurbish the existing buildings and the costs associated with this.

Design and Access Statement and Addendum (Karakusevic Carson Architects)

- 4.4 The statement (and addendum), sets out the wider context in which the site lies, the relationship of the proposal to public transport facilities and other infrastructure and the way in which the site context has informed the design. Options explored and discounted have been discussed together with the rationale for the preferred approach. The report details the breakdown of commercial and residential use, setting out the location and size of each unit within the site by type and layout and describes in detail, the elevational makeup of the scheme by breaking down each of the elements of the materials and design. The report also covers public consultation undertaken, a study of routes/links to the site, secure by design, energy and sustainability, local views, lifetimes homes and wheelchair standards.
- 4.5 The Addendum provides additional views of the development from the Crossfields Estate and Creekside Centre and also provides shadow diagrams to show the impact of the proposal. Additional information regarding the proposed detail for refurbishment of the existing units is also included.

- 4.6 Landscape and Public Realm Statement and Landscape and Public Realm Creek Edge Clarifications Precedents (Wetherford, Watson Mann Architects) **For Information Purposes Only**

These statements seek to explain the landscape and public realm proposals for the site setting out how spaces within the site would be used, hard and soft landscaping proposals and detail relating to Creek edge. To supplement the landscaping proposals a document prepared by the Creekside Education Trust has been submitted 'Landscape and Ecology Advice'. This document includes a

botanical site survey together with a suggested landscape strategy, colonisation and species and management.

For reasons explained in this report the detailed landscaping proposal is not considered to be appropriate and therefore the documents do not form part of the package to be considered in making a decision.

4.7 Transport Assessment (and Addendums), Final TA and TP Review Report, Car Parking Management Plan and Framework Travel Plans (by Steer Davies Gleave)

The initial Transport Assessment and additional reports consider the appropriateness of accesses, car parking and cycle parking within the scheme, in relation to its level of public transport accessibility (PTAL 4). The reports cover construction traffic and also assess the impact of the proposals on car parking in the area and mitigation measures required to address car parking and sustainable transport modes. The additional assessments cover sensitivity testing and draft car park management plan.

The travel plan framework sets out travel planning measures for residents and businesses.

Delivery and Servicing Plan (Steer Davies Gleave)

- 4.8 The plan is included as an appendix to the ES. The plan considers how both the residential and commercial uses would be serviced and how deliveries would be made to the commercial units. The plan sets out the refuse and recycling facilities for the commercial and residential elements and details collection arrangements. This document has been treated as a draft. A final DSP would be secured by condition.

Construction Logistics Plan (Steer Davies Gleave)

- 4.9 The plan is included as an appendix to the ES. The plan sets out a framework for managing all types of freight vehicle movement to and from the construction site. The plan sets out the construction programme (3.5 years), phasing and an estimate of construction vehicle trips. The plan states that further investigation would be undertaken into the potential of transporting materials and construction waste via the Creek. As the construction programme is not formalised and no construction contractors have been appointed the plan cannot identify specific targets. Therefore this document would be treated as a draft framework and a final CLP would be secured by condition.

Daylight and Sunlight Report (GL Hearn)

- 4.10 This study was submitted as part of the ES. The study considers the impact of the proposals on the daylight and sunlight enjoyed by properties to the north and west of the site. The report also looks at amenity space within residential properties to the west, the Creekside Centre and the Creek. The report assess the daylight/sunlight impact for the proposed residential units. It concludes that neighbouring properties would still enjoy good levels of daylight and sunlight amenity after implementation of the scheme and that the shadowing of amenity space is also within acceptable limits in line with BRE guidance.

Flood Risk Assessment (Waterman Transport and Development Ltd)

- 4.11 This assessment was included as part of the ES. The assessment covers site hydrogeology, sources of potential flooding, tidal flooding, flood mitigation and management, surface water runoff and proposed measures to deal with flooding, surface water and drainage.

Revised Energy Strategy and Revised Sustainability Statement (Hoare Lea)

- 4.12 The statement principally sets out how the proposals meet the London Mayor's energy hierarchy. It confirms that the most suitable means of providing heat and power is by gas-fired CHP combined with solar hot water heating and that the Mayor's policy for total carbon savings can be met.
- 4.13 The statement includes CfSH and BREEAM Pre Assessments which show that the residential elements can meet CfSH Level 4 and the commercial elements can meet BREEAM 'Very Good'.
- 4.14 The reports discuss future connection to SELCHP as well as living roof and drainage proposals.

Heritage Assessment (Waterman, Energy, Environment and Design Ltd)

- 4.15 This assessment was included as part of the ES. The assessment identifies the Heritage Assets on the site and the surrounding area, their significance and the impact of the proposals on them.

Regeneration Statement (Quod)

- 4.16 This statement sets out the employment benefits of the proposal. The statement sets out the context of creative industries within the employment sector in London as a whole, Lewisham and then within Deptford. The report analyses the value of creative industries and then goes on to explore the creative cluster at Creekside. Workspace portfolio and business model is discussed. The report describes the proposed development and the economic rationale for the proposal setting out the mitigation measures and benefits that would arise from the development.

Affordable Housing and Viability Statement (Quod)

- 4.17 This report sets out the viability of the proposal and its financial capacity to support affordable housing and identifies the process by which this would be considered. The content of this report is confidential.

5.0 Consultation

- 5.1 This section outlines the consultation carried out by the applicant prior to submission and the Council following the submission of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.
- 5.2 Numerous site notices were displayed in the vicinity of the site on 26th December 2012. Following the receipt of amended drawings and additional information in March 2013 additional site notices were displayed on 27th March 2013.

- 5.2.1 The application was advertised as EIA development and a departure from adopted planning policy in the local press on 19th December 2012. Following the receipt of the ES Addendum, amended drawings and additional information a second press notice was published on 3rd April 2013.
- 5.2.2 Letters were sent to 729 residents and businesses in the surrounding area as well as Local Amenity Societies on 17th December 2012.
- 5.2.3 Following the receipt of amended drawings and additional information in March 2013 a second consultation letter was sent to the residents and businesses that had submitted representations in response to the original consultation on 27th March 2013.
- 5.2.4 A local meeting was held on 12th February 2013 (before the submission of additional/revised information). All third parties that had commented on the application in response to the first round of consultation were invited to attend the local meeting which was held at the Creekside Centre.
- 5.2.5 Rt Hon Dame Joan Ruddock MP and the relevant Ward Councillors were notified of the application as part of the first and second round of consultation.
- 5.2.6 Copies of all application documents were published on the Councils website.
- 5.2.7 As well as relevant Lewisham Council internal consultees, the following statutory consultees were also consulted:

Crime Prevention Officer
Creekside Education Trust
English Heritage
Environment Agency
Fire Prevention Group
Greater London Authority (GLA)
Lewisham Cyclists
Lewisham Primary Care Trust
London Borough of Greenwich
London Buses
London Cycling Network
London Fire and Emergency Authority
London Wildlife Trust
Natural England
National Planning Casework Unit
Network Rail
Neighbourhood Community Safety Service
Port of London Authority
Thames Water
Transport for London (TfL)

Pre-Application Consultation

- 5.3 The applicants Design and Access Statement sets out the consultation that they undertook prior to submitting the application. It is stated that this comprised:-
- Five meetings with APT Trustees;

- A meeting with the Cockpits Arts Site Manager;
- A meeting with Arts Hub;
- A meeting with the Laban Centre;
- Three meetings with the Creekside Ecology Centre;
- Initial meeting with Crossfields Estate Steering Group;
- Two local residents drop-in events (June and December 2011);
- Five drop-in events/exhibitions at Faircharm for local businesses and residents (2011 and 2012);
- Updated images were sent to the Crossfields Steering Group Secretary for the Crossfields website and other blogs;
- Booklets/leaflets explaining the proposal were distributed;
- A meeting with existing business tenants, LBL and Dame Joan Ruddock MP was held in September 2012;
- Email updates were issued to existing tenants on a fortnightly basis;
- Boards displaying the proposal were erected in the Faircharm reception;

In addition the applicant team had pre-application discussions with the GLA and the Environment Agency as well as engaging in extensive pre application discussion with LBL Officers.

Consultation Responses

Written Responses received from Local Residents and Organisations

- 5.4 At the time of writing 55 letters of objection had been received from local residents and organisations.
- 5.5 The Occupiers of 18 Woolwich Road, 4 Lizban Street, 35 Upper Tulse Hill, 5 Diamond Terrace, 20 Rokeby Road, 76 Royal Hill, 1A Deptford Broadway, 51 Deptford High Street, 11 Waller Road, 12 Flamingo Court, 17 Maple House, 14 (x 3 letters) Oxenham House, 30 and 33 Farrer House, 5 Finch House, 1 and 12 (x 2 letters) Cremer House, 9 and 29 Frankham House, 28 and 38 (x 2 letters) Wilshaw House, 22 and 43 (x2 letters) Castell House, 17, 32, 38 and 40 Holden House, Crossfields, Motor Vehicles Sabine, Barnacle and The Minesweeper, Units A120, A121, B112A, B202, B207 and 1/2/4/7/8B Faircharm, Studios, 301, 302, 303, 306, 308 and 311 Cockpit Arts, The Gallery Manager at APT Studios (x 2 letters), APT Studios 2.11 and 6 (3 letters from unknown units in APT Studios) raise the following issues:-
- Building B is in very good order, it functions well as an industrial unit and its heritage and character is of interest to the area. It should not be demolished;
 - It is surprising the existing buildings are not listed;

- Building B is the key building viewed from the Ha'Penny Bridge and together with the Listed Pump station on the Greenwich side of Creek offers a vista of the industrial heritage;
- Building B is the only building that could offer larger industrial units;
- The proposal would harm the conservation area;
- All/more of the units should be given B2 use;
- The change of use to B1 would have a detrimental effect on the artists / business that currently lease units from Workspace;
- The proposed units are very small;
- There is a significant reduction in the amount of employment floorspace proposed;
- How would more jobs be created when the floorspace is being halved;
- The new buildings would overshadow neighbouring properties;
- The new buildings would cause 20% reduction in natural light to Crossfields Estate;
- Buildings 01 and 04 would block daylight from the APT studio building and yard;
- The Creek should be used to transport construction material to/from the site as this would reduce vehicular traffic movements;
- There are serious concerns that the new studio units would not suit the existing tenants;
- The new studio space would not be affordable for local artists/businesses;
- Workspace has not given enough consideration to retaining the existing tenants;
- Displacing existing artists and businesses would have a negative effect on Creekside;
- There is nowhere local and affordable for creative businesses to relocate;
- Based Upon is effectively being forced to leave Faircharm and there is insufficient space in Deptford or Lewisham to house them;
- The Council should review the planning application to see if Based Upon could be kept on as tenants in a suitable studio space;
- When the pumps from the pump station are running they issue a low sub-base drone, the impact of this on residential properties should be considered;
- The impact of radiation on the proposed residential units from the DLR needs to be considered;
- The noise impact from the DLR on the proposed residential units needs to be considered;

- The proposed 12 storey building is not appropriate for this site;
- The tall building would adversely affect outlook and views from neighbouring buildings;
- There are already too many high rise buildings in this area;
- There are too many new flats in the area already;
- The tall building would overshadow boats moored on the Creek, this includes overshadowing of solar panels;
- The height, bulk and mass of the new building is not appropriate for the site;
- There is insufficient parking proposed for the commercial and residential uses;
- The development would give rise to unacceptable traffic congestion;
- There is not enough affordable housing proposed;
- There is not enough family housing proposed;
- The infrastructure in the area cannot accommodate all this new housing;
- During construction there would be unacceptable noise, dust and pollution;
- The number of construction vehicles that would need to visit the site cannot be accommodated without giving rise to traffic congestion;
- Access to the Creek is welcome but it would be overshadowed most of the time;
- The proposal would harm the ecology of the Creek;
- If this development goes ahead the Developer should pay for improvements to and maintenance of paths and roads leading to the site;
- The opportunity should be taken to increase boat moorings;
- There was insufficient pre-application consultation with the community, the residents of Crossfields Estate were not fully consulted;
- Workspace has driven businesses out of Faircharm because of redevelopment proposals and changes to lease arrangements;
- Existing occupiers of Faircharm were not properly consulted by the Applicant;
- The open access to the Creek must be secured otherwise this would become a gated development in the future;
- There are already a number of empty office units in this area;
- Is there adequate drainage for this amount of new development;
- Insufficient mitigation has been offered to offset the harm this development would cause;
- Some of the quotes in the Environmental Statement are not correct;

- The landscaping proposals are not good enough. How can trees be planted adjacent to the Creek;
- This proposal amounts to overdevelopment;
- Insufficient time was provided over the Christmas period for commenting on this application.

5.6 A petition was submitted with a total of 111 signatures (37 from residents of the Crossfields Estate, 30 from adjacent businesses and 44 other interested parties). The petition raised the following objections:-

- 180 construction lorries per day for three years, causing Creekside to become dangerous, noisy and polluting
- The 13-storey tower and three 7-storey buildings would block out sunlight to Crossfields residents living on Creekside by 20%
- Demolition would cause rats, dust and pollution
- Only 28 parking spaces for a potential 250 residents and 200 employees
- Increased foot traffic through Crossfields Estate which residents pay to maintain
- Promised access to the Creek would be in the shade for most of the day
- Only 15% (22) of the 148 proposed flats would be affordable
- It's a major threat to the ecological biodiversity of Deptford Creek and its surrounds
- The development is inappropriate for a Conservation Zone
- This area is designated for employment but the present creative business tenants would not be re-housed and other tenants would not be able to afford the new office spaces
- The environments of two established and highly regarded cultural centres would be radically altered.
- Nothing has been offered to us by way of compensation for the loss of light and views and three years of dust and pollution.

5.7 Friends of Deptford Creek

Several of our members who are Creekside residents are concerned about the above planning application and wish to object for the following reasons:

- The height of the residential building is too tall and would reduce the amount of light.
- The proposed application would ruin and dwarf Creekside.
- The proposed building materials are not reflective of the industrial heritage of Creekside.

- Local artists would no longer be able to afford the rents of the proposed new studios.
- Creekside is a protected conservation area and as such industrial buildings should be protected not developed.
- This area is supposed to be for industry rather than increased residential usage.

5.8 Creekside Education Trust

Initial Comments: The Creekside Education Trust (CET) has provided ecological survey work and advice for the new landscaping design to benefit ecology to Workspace Group PLC for the proposed Faircharm Creative Quarter. This report includes strong emphasis on the need for future management of this landscaping and engaging with residents if it is to be adopted.

Trustees also have their own independent comments on the planning application, which are in addition to the report prepared for to Workspace Group PLC. The maintenance and interpretation of the ecological landscaping suggested in our report is key to its success. If this is approved as a physical design but not implemented in terms of maintenance and interpretation, it would fail and CET would like to make it clear in our comments that we wish to see this future maintenance included as a condition on the planning application if approved. If it is not, we are unable to take responsibility for the failure of this landscaping to perform the role it has been designed to fulfil and would criticise this omission publicly. Equally the sourcing and type of landscaping materials, wild seeds and tree species has been specified and this too needs to be followed to ensure the success of the landscaping plan.

- 5.7.1 Regarding the height of the new buildings, adjacent to Creekside Discovery Centre and the Creek; they would clearly affect our sunlight and we do not support the main height of the larger tower. We also have reservations on how the smaller tower would affect our site in terms of shading.
- 5.7.2 The increased residential use would undoubtedly bring a demand for more parking and this has been the direct experience of the Laban centre in Creekside where local parking on Creekside has greatly increased and is not well managed. This does need to be tightly managed to avoid the same happening with this development.
- 5.7.3 The noise and disruption of demolition also needs to be considered in the context of and coordinated with the other Thames Tunnel shaft work being consulted on this year as the two would be running in parallel if approved.
- 5.7.4 The potential for the Creek being a recipient of demolition materials (by accident of course but never the less a damaging impact) must be regulated against and monitored. Other sites along the Creek have left a visible legacy of this which is still evident.

- 5.7.5 There is no mention of interpretation signs about the Creek or the ecology for the new landscaped river edge. The viewing platform constructed from the old staircase needs consideration of litter control incorporated in its design to avoid the inevitable dropping of litter directly into the Creek below.
- 5.7.6 Entrance to the Creekside Discovery Centre must be useable at all times unless permission is sought from the staff at CET. This is needed for public and educational access and our other charity activities. Finally, CET staff take groups of adults and children into the Creek alongside the development site. This needs to be taken into consideration to ensure public safety during demolition and construction.
- 5.7.8 **Further comments:** Trustees and staff from Creekside Education Trust (CET) were delighted to hear about the separate planning application Workspace was submitting for proposed Creek wall enhancements. This had not been in discussion when CET was contracted to provide ecological and landscape advice for the Faircharm creative quarter.
- 5.7.9 On examining the proposal and plans for the suggested work CET was surprised and disappointed. We believe the enhancements proposed would be of minimal ecological value to the Creek. The reason for this is twofold:
- 5.7.10 Design - CET has been involved with and managed Creek wall enhancements since the mid nineties. Unfortunately the proposed design does not take previous learning's into consideration. Some of these have been published in Deptford Creek, Surviving Regeneration (1999) and Deptford Creek, Living on the Edge (2002). It also seems like methods mentioned in 'Manual on the use of timber in coastal and river engineering' (2004) by Matt Crossman and Jonathan Simm (as referred to in the planning application) were adopted without taking the actual location and circumstances affecting it into consideration. This is not the place to comment on the 2004 document but it does miss some lessons learnt by then and there have been others since.
- 5.7.11 Chosen area for enhancements - As part of the ecological and landscape advice CET provided to Workspace, staff and trustees decided to include a plant survey of the Creek walls boarding the site. Nick Bertrand (freelance conservationist), who has worked with and for CET since the founding of the trust, conducted this survey. Within this document the section of steel sheet piling proposed for enhancement (Section B as per DC_13_82645_FT-EXISTING_CREEK_WALL_NOTES-200984) was noted as having the lowest ecological diversity. However it is a very short section of the wall overall, when looking at sections of walls holistically including length, the concrete wall (Section D as per DC_13_82645_FTEXISTING_CREEK_WALL_NOTES-200984) is far worse. Unfortunately CET was not consulted regarding the proposed Creek wall enhancement and would not have advised or supported the submitted plans.
- 5.7.12 CET is encouraged by Workspace's intention to enhance ecological diversity within the Creek and on flood defence walls of the proposed Faircharm Creative Quarter. However we believe that learning from past successes as well as failures is vital in ensuring resources are invested in the most efficient way, with maximum benefit to our local wildlife. **NB: In response to these comments the design of the fenders was amended.**

- 5.7.13 **Final comments (on revised fender design):** The current design would not be durable enough for the conditions of the Creek as they stand. In addition they would not provide much improvement to conditions for colonisation. It is not possible to provide a “one size fits all” solution to work on the Creek due to the very nature of a wild waterway with the currents and tidal movements seen.
- 5.7.14 For maximum return on investment, any enhancements on this wall should be at least to equivalent quality of timber on Faircharm’s wall by the CET beach.
- 5.7.15 Currently 5 horizontals are proposed at various levels. Unfortunately most of these are at heights that would provide little opportunity for colonisation, with only one being optimally placed. Levels/heights are of paramount importance and this can be clearly demonstrated on past enhancement initiatives in the Creek. Installing two high quality ones at more optimal heights (CET can advise on these) would be of greater benefit than the five proposed.
- 5.7.16 CET has re-evaluated past enhancement approaches and has prepared a working draft example based on lessons learnt from previous Creek improvements. CET has spent considerable resources on these designs. They take into account the in-pans on sheet piling flood defences. CET has not had the opportunity to update these drawings based on our latest experience, which would include some simplifications and enhancements. CET can work together with Workspace to update and revise the drawings. These together with plans LP has of Creek wall enhancements that took place on flood defence walls by CET’s beach, can provide guidance when considering the current proposal.

5.8 Greenwich Conservation Group

In principle we raise no objection to the proposal to redevelop the present site in the manner proposed in the submitted planning documentation although we do have a major concern about the height of new Building 04 and at the combined bulk and massing of this block with the adjacent new Building 03.

- 5.8.1 While the documentation shows that in certain views from within the Ashburnham Triangle Conservation Area the visual impact of the proposed development would be minimal, the same cannot be said for the impact on the West Greenwich Conservation Area. Image 3.9 in the Townscape And Visual Impact element of the submission clearly shows that the development, particularly the 13 storey high new Building 04 would have an impact on the West Greenwich Conservation Area - view from Greenwich Station platform level - with the more horizontally bulky Galliard scheme in RBG at 43-81 Greenwich High Road in the background.
- 5.8.2 We also believe that the height of new Building 04 along with the bulk of new Building 03 would impact adversely on the setting of the Grade 2 listed Deptford Pumping Station buildings and their associated Coaling Sheds - also Grade 2 listed.
- 5.8.3 The supporting documentation clearly shows that in the view from The Point the development would not have an adverse impact on the view of St Paul's Cathedral but other views show that the bulk of the new buildings would affect the view of St Paul's Church, Deptford. It is significant that the corner of new Building 04 has been cut away to ensure that the spire of the church can still be read in views from the east across the Creek.

- 5.8.4 We are appreciative of the proposed environmental improvements planned for those parts of the site which abut the Creek - as indicated on drawing FCH 001 Rev B in the Landscape and Public Realm element of the submission – and we welcome the extensive planting which is to be added around the whole of the frontage to the Creek which at this particular point wraps around the northern, eastern and southern extremities of the site.
- 5.8.5 We do however question whether a connection with the site of the Creekside Discovery Centre immediately to the north has been investigated and, similarly, whether there is any mileage in attempting a link with the site of the ATP premises immediately to the south.
- 5.8.6 We consider the mix of retained former industrial buildings combined with new buildings offering a restrained range of materials and relatively simple forms results in a successful solution and we particularly like the treatments proposed for the street and courtyard spaces created in both the retained and new areas.
- 5.8.7 We are however concerned at the level of car parking provision which at only 28 spaces (3 of which are for disabled persons use) is in our view inadequate for a 148 apartment development and for those working in or visiting the Class B1 use elements - in excess of 4,000 sqm of floorspace - despite the fact that the site has a PTAL rating of 4 which is relatively high. Nevertheless 28 spaces seems inadequate.
- 5.8.8. We seriously question the under-provision of units capable of accommodating families - only 17 out of the 148 total equivalent to 11.5%. The argument given at 4.4.29 of the Planning Statement that "emphasis is being given to 1 and 2 bed units because of the urban/mixed-use nature of the scheme" has to be challenged in that this approach would make for an unbalanced and unrepresentative community.
- 5.8.9 Similarly the amount of affordable housing at only 21 out of the 148 units is - at barely 14% - woefully below LBL's recommendation of 35%. Additionally LBL's strategy is that within the affordable housing offer, 42% should be for families. Here only 1 of the 21 units is a three-bed unit.
- 5.8.10 Finally, although all the units have private amenity space either in the form of projecting balconies or terraces we consider that, where living rooms or bedrooms occur at ground floor level and particularly on the eastern side of the development where access to the Creek is being promoted, there would be a need to provide a decent area of screened amenity space to ensure privacy for the residents at these locations.
- 5.8.11 The amount of communal amenity space might also be questioned although if residents are being allowed to make use of the shared courtyards in the B1 use elements we are minded to accept this as a compromise arrangement.
- 5.8.12 We consider that on balance this proposal has the potential for giving an uplift to the area and I particularly like the improved appearance as seen from Creekside (the street).
- 5.8.13 Any representations received after the deadline for this report would be reported verbally at the committee meeting.

5.8.14 Third party issues raised have been addressed in relevant sections of this report.

Amenity Societies Panel

5.8.15 No objection to the refurbishment of the existing buildings and smaller scale development adjoining Creekside. However, the larger scale and more intensive development to the Creek was considered completely out of character with the newly designated Conservation Area. Most inappropriate of all was the tower block with the shaved off side intended to preserve the protected view from Blackheath point. The Panel considered that a tall building on this site and so close to a protected viewing corridor was totally unacceptable. As the site is currently in a defined employment area, the introduction of residential use should make development viable without this unwarranted degree of intensification

Written Responses received from Statutory Consultees

GLA

5.9 Principle of development

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

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

5.9.3 In seeking to address the Councils policy requirement that the site remain in employment use, the applicant has analysed a range of scenarios throughout the pre-application process to demonstrate that the retention of solely employment floor space is not sustainable or viable. In accordance with the London Plan, it is acknowledged that a mixed use development is a means of bringing forward jobs and growth, and new homes.

In this instance, the reduction in floor space is substantial, and whilst it is acknowledged that the scheme makes more efficient use of the space and nearly triples the number of jobs on site, it would be important to ensure that mechanisms are in place to secure the type of businesses that would achieve these employment numbers and affordability levels, with flexibility to ensure that a range of businesses of different types and sizes, including small and medium sized enterprises can be accommodated. Evidence of how existing occupiers of the development would be accommodated, and how Workspace would encourage them to remain and relocate following redevelopment.

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

Housing

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

Unit Type	Private		Affordable rent		Total	
1-bed	55	(43%)	7	(33%)	62	32%
2-bed	56	(44%)	13	(62%)	69	56%
3-bed	16	(13%)	1	(5%)	17	11%
Total	127	86%	21	14%	148	100%

Affordable housing

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

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

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

Housing mix

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

Residential quality

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

Children's play space

- 5.9.11 Based on the Mayor's playspace SPG, 28 children are predicted to live in the development of which 17 would be under the age of 5. This gives rise to a total child playspace requirement of 280 sq.m. of which 170 sq.m. should be on-site and designed for under 5s. The scheme proposes 1,140 sq.m. of dedicated open space on site, of which 200 sq.m. is play space for children. The details of this play space should be secured by way of condition.

Density

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

Strategic views / tall buildings / urban design

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

- 5.9.14 The applicant has prepared a detailed townscape and visual impact assessment that considers local and strategic views. This study shows that the visual impact on the wider area, including listed buildings and nearby conservation areas, would not be significant. The impact on the longer distance viewing corridors from Blackheath Point (LVMF View 6) and Blythe Hill Fields (a Lewisham UDP Designated View) have also been evaluated and demonstrates that views of St Paul's and St Paul's Deptford would be maintained, and not unduly impacted upon.
- 5.9.15 This scheme has been the subject of extensive pre-application discussions, during which the scheme has evolved significantly following the designation of the Deptford Creekside Conservation Area (which includes Faircharm Estate), in May 2012. The applicant subsequently reconsidered their proposal in the light of this designation and submitted this current scheme which retains and remodels two of the three existing buildings (Buildings B and C) for new commercial uses, and entails the demolition of one building (Building A) to facilitate construction of four new blocks of flats (one of 12 storeys and two of six and seven storeys).
- 5.9.20 The retention of the 1950s buildings fronting Creekside and their sensitive remodelling and imaginative refurbishment for new B1 commercial uses is welcomed. This would greatly assist in the preservation of the intrinsic mid 20th century industrial character and townscape of this part of the Conservation Area viewed from Creekside. The retention of these buildings also greatly mitigates the height of the proposed 12 storey tower from the vantage point of this thoroughfare and from the public realm within the Crossfields Estate – they act as an effective foil to the taller building.
- 5.9.21 The height of the tallest block of flats, at 12 storeys (Building 04), does represent a very substantial increase in scale compared with the existing three storey Building B. The massing, articulation and rhythm of inset balconies and the richly textured facing brickwork should create a new landmark on the Creek, which respects and reinforces its industrial character.
- 5.9.22 The proposal creates a sequence of clearly legible spaces and views between the buildings to be retained and the new-build elements which it is considered would work well, respecting the urban grain of the historic district with its established network of courtyards and alleys, and enhancing its character.
- 5.9.23 The palette of materials of the new buildings has been well considered – the brick elevations (with colour-matched mortar and good articulation afforded by the differing brick tones and reveals), galvanised steel elements and the granite sets of the yards and paths complements the Creekside warehouse vernacular and thus enhance the character of the conservation area. The simple fair-faced concrete slab and balustrade railings of the projecting balconies are very much in keeping with the robust waterside architectural idiom.
- 5.9.24 The landscape and public realm strategy considers the existing ecology of the area and the approach to creating public spaces, yards and gardens, is in harmony with and responding to the established 'Creekscape'. The detailed hard and soft landscaping proposals should enhance the site representing a significant improvement on the harsh car parking and servicing areas that currently detract from the setting of the Creek. The orientation of the new buildings with their staggered building lines, varying heights, mixed uses and generous open landscaped areas along the Creek-edge should also enhance its character.

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

Inclusive design

- 5.9.26 The application is accompanied by access statements which cover the principles of inclusive design, access across the site, pedestrian routes, and drop off points. The level of detail provided is welcomed and all of the external gradients and access routes into the site for pedestrians are acceptable. Noting the varying levels across the site and within the existing buildings, there are stepped routes across the site at present. The scheme has been designed to provide level access into the buildings, and lifts are provided to all floors (with the exception of mezzanine levels). The exception is the refurbished Building A, where the main entrance requires an internal lift to be provided. This is accepted, noting the 1.6 metre level change.
- 5.9.27 The applicant has set out how each of the 16 points for Lifetime Homes would be met and has confirmed that 15 (10%) of units would be provided as wheelchair adaptable, spread across a range of unit sizes. Typical flat layouts are shown, with details of how relevant standards would be met. Details should be provided confirming the location of these units, and that they cover both private and affordable housing and are not clustered together. Ideally some would be fitted out as accessible from the outset. These commitments should be secured by way of condition.
- 5.9.28 In terms of parking provision, the scheme proposes three disabled parking bays out of a total of 28, which falls short of the expected one space per wheelchair accessible flat. As such, the parking management plan should include a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced. **NB: This has subsequently been revised so that all wheelchair units have a car parking space.**

Climate change mitigation

- 5.9.29 The applicant has followed the energy hierarchy and is proposing to reduce carbon emissions by 27%, thus exceeding London Plan targets. Savings of 2% would be achieved from energy efficiency measures with 21% savings from a combined heat and power plant, which would provide the lead source of heat for the site wide energy network. The applicant is also proposing to install 133 sq.m. of solar photovoltaic panels on the roof of the building, providing a further 6% savings.
- 5.9.30 The applicant has also provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. This together with a commitment to connect all apartments and non-domestic buildings to a single site wide energy network should be secured by condition or planning obligation.

Climate change adaptation

- 5.9.31 The applicant has submitted a sustainability report, which includes relevant BRE and Code for Sustainable Homes and pre-assessments. The applicant states that it is intended that all homes be designed to meet Code for Sustainable Homes Level 4 and BREEAM 'very good' for the commercial space. The applicant's statement sets out a number of techniques proposed to reduce energy consumption and cut carbon emissions, with high insulation, energy efficient glazing, and heat recovery, making use of orientation for solar gain and shading. Low energy lighting, energy efficient appliances, low water use sanitary-ware and fittings are proposed.
- 5.9.32 Noting the location within Flood Risk Zone 3A, a sustainable urban drainage system is proposed. Of particular note is that green roofs and rain water harvesting are proposed to address surface water management. The drainage strategy involves the majority of surface water discharge to the Creek, in agreement with Thames Water. The applicant's commitments should be secured by way of condition.
- 5.9.33 In light of the location adjacent to the River Thames, policies 7.26 and 7.27, which relate to the Blue Ribbon Network, are also of relevance. Consideration should be given to using water based transport for freight if feasible, particularly during demolition and construction phases. Appropriately worded conditions should be secured.

Transport

- 5.9.34 TfL modelling of the A2 Deptford Bridge/Deptford Broadway/Deptford Church Street junction showed above 100% saturation on some arms with already permitted development flows. Therefore any additional impact from this development would add to the oversaturation i.e. increase queue lengths. As such it is vital that, despite the low car parking provision (25 spaces) and low predicted traffic generation from the site, the mode share for walking, cycling and public transport is maximised.
- 5.9.34 Thus it is expected that section 106 funding would be secured in this respect, for example improving the currently poor pedestrian and cycle environment on Creekside, contributing to planned improvements at the A2 Deptford Bridge/Deptford Broadway/Deptford Church Street junction as part of TfL's 'Better Junctions' programme, and contributing towards information provision and signage to and at the DLR station at Deptford Bridge. Cycle Superhighway 4 is also planned to run along Creek Road, funded through the TfL Business Plan, so it may be appropriate to seek contributions towards improving cycle links/signage to this route. A robust travel plan seeking to minimise peak hour traffic should also be secured, and likewise a delivery and servicing plan and a construction logistics plan.
- 5.9.35 The transport assessment (TA) shows that in future years, queue lengths on Creekside at its junctions with Creek Road and Deptford Church Street become significant as traffic increases due to local developments. It is unlikely that signalisation of the Creek Road/Creekside junction would be supported at a strategic level due to the impact on traffic flow on Creek Road (part of the SRN). Therefore it is suggested that options to 'calm' Creekside to discourage through traffic are considered, with developer funding sought if appropriate. This would also benefit pedestrians and cyclists.

- 5.9.36 Due to the variety of services in the area and the relatively small number of trips produced, it is unlikely that the development would have an impact on public transport capacity.
- 5.9.37 One concern however, is the proximity of the development proposals to the DLR. Although the 5m protection zone is respected, TfL is seeking conditions to ensure that detailed design and construction methodology are agreed with, and approved by, DLR prior to commencement. This is in order to ensure that the proposals do not compromise the safe and effective operation of the DLR network. The development should also incorporate appropriate mitigation against noise, vibration and visual impacts on residents and occupiers arising from DLR operations.
- 5.9.38 As highlighted above, the main access road, Creekside, is a relatively poor quality environment, particularly at the south end – the main route to the DLR station. As such, it is expected that the developer would contribute funds to improvements where possible, noting that major improvements such as footway widening may only be possible following redevelopment of adjacent sites.
- 5.9.39 The development has a relatively low (less than 0.2 spaces per dwelling) car parking provision and this is strongly supported.
- 5.9.40 Provision of blue badge and cycle parking and electric vehicle (EV) charging points for both the commercial and residential units should conform with London Plan standards. Details should be secured by way of condition.

Conclusion

- 5.9.41 The application broadly complies with the London Plan, however, further information and/or confirmation, as detailed below is required to comply fully.
- 5.9.42 Principle of use: A mixed use development within the Deptford Creek/Greenwich Riverside Opportunity Area is acceptable in principle, and whilst a reduction in commercial floor space is proposed, there would be a projected increase in employment numbers. Details of the proposed business space should be secured in the section 106 agreement.
- 5.9.43 Housing: The viability assessment should be independently assessed and its findings shared with the GLA. The acceptability of the housing mix, particularly the number of three-bed affordable units should be confirmed by the Council. Details of the fit out of the children's play area needs to be provided and secured. The density is acceptable and the high standard of housing quality is welcomed.
- 5.9.44 Tall buildings, views and urban design: The scheme is of high architectural quality, and the scheme respects the heritage designations, and would not adversely impact upon strategic views.
- 5.9.45 Inclusive design: The inclusive design provisions are welcomed. The 100% Lifetime Homes and 10% wheelchair accessible flats should be secured by condition. Confirmation regarding the location of the wheelchair accessible flats should be provided and a parking management plan secured.

- 5.9.46 Climate change: The proposed 25% carbon dioxide savings are welcomed. Potential future connection to a heat network, together with commitment to a single site wide energy strategy should be secured. The sustainability measures are in accordance with the Mayor's standards and should be secured by condition.
- 5.9.47 Transport: The scheme is acceptable in principle but the poor quality of the pedestrian and cycle environment needs resolving, together with protection of DLR assets and operations. Prior to Stage 2, the developer and/or Council should therefore clarify how these issues are intended to be addressed.

Transport for London

- 5.10 TThe application is referable to the Mayor and, as such, comments provided at this stage are TfL officer views and do not prejudice the views of the GLA or any subsequent planning decision by the Mayor.
- 5.10.1 Note that the application was considered at Stage 1 by the Mayor before I had reviewed the additional transport information submitted. The Stage 1 report incorporated my initial comments and as such they should be considered alongside my comments set out below.
- 5.10.2 As highlighted in the Stage 1 report, the application involves the redevelopment of a site where a support column for DLR's viaduct is founded. Therefore, any impact on the foundation for this column is of paramount concern to DLRL, the division of TfL responsible for DLR planning and operations. We note that whilst the developer has allowed for DLR's 5 metre protection zone, Building 4 is in close proximity to the column and may impact upon the structure. In order to avoid any danger of impact as a result of the development we request that a condition requiring details of the foundations for this building is applied to the decision.
- 5.10.3 Constructing the buildings in proximity to the DLR would require the use of cranes; these are of particular concern to DLRL given the nature of our passenger operations below, therefore we request a condition is attached requiring details of a Crane Management Plan.
- 5.10.4 Additionally, to protect DLR's operations the conditions to control external lighting, access for emergency vehicles and maintenance are requested.
- 5.10.5 The planning drawings indicate that the access route to the DLR structure is through an area of landscaping, whilst this is an acceptable route, DLRL is concerned about the amount of vegetation that would be cultivated here, obstructing the path of emergency vehicles. Therefore, it is essential that the public realm and landscaping plan is developed in coordination with DLRL. I understand you are keen to agree details of the landscaping prior to determination of the planning application and that you would be forwarding the relevant information in due course for comment by DLRL. However in the event this is not done, we request to be consulted on the landscaping details submitted via condition.
- 5.10.6 The developer should also be reminded that it is their responsibility to ensure that the design, structure and acoustic insulation of the development shall be of such a standard to not adversely impact residential amenity from operational noise or vibration from the DLR.

- 5.10.7 We discussed possible temporary uses may be allowed under the DLR structure. We request that the Council consult DLRL to ensure any proposed temporary uses are compatible with safe operations of the DLR and that you consider if a condition is necessary to this effect.
- 5.10.8 We discussed at length the options for improving walking and cycling access to the site and in the Creekside area as a whole. I have since reviewed the planning permission for the Greenwich Industrial Estate in Norman Road (ref 11/0271/F) and can confirm this would provide a high quality, more direct link from Greenwich DLR station entrance to Norman Road. Therefore it does seem sensible to focus s106 funding on the east-west corridor between Deptford National Rail (NR) station and Greenwich DLR station, alongside the National Rail line and over the Halfpenny Bridge. I walked this route on Friday last week and noted the following issues:
- Crossing Norman Road and signage to the Halfpenny Bridge link (though this is in RB Greenwich) – Norman Road carries a relatively large HGV volume for a small road;
 - Lack of signage to Greenwich DLR/NR station from Creekside;
 - Opening up of the Network Rail railway arches to increase activity (as we discussed);
 - The development would appear to benefit from a new footbridge link between the Halfpenny Bridge and the north east corner of the site, as suggested at the meeting, though we acknowledge potential objections due to shadowing of the Creek bed adjacent to the Creekside Education Centre and security issues;
 - There appears to be a ‘missing link’ between the foot/cycle way and Deptford Church Street eastern footway, through an area of vegetation which, if opened up, would give a direct route between Creekside and Deptford Church Street. However, it is acknowledged that the pedestrian crossings lie to the north and south away from this line;
 - Resolution Way provides a direct route to Deptford NR station/Deptford High Street from Deptford Church Street yet it is not at all clear the status of this route from either end (i.e. private or public).
- 5.10.9 You should consider how some of these could be addressed through s106 funding. Better signage, particularly to Greenwich DLR/NR station and Deptford NR station would be a relatively inexpensive ‘quick win’. Similarly, as discussed, a ‘public transport departures’ screen at the entrance to the development (computer linked to a large TV with real-time departures feed from Greenwich DLR station, requested via the TfL website) would have great benefits at low cost.
- 5.10.10 One further issue is that of the proposed Thames Tideway Tunnel (TTT) worksite at Greenwich Pumping Station¹. This is directly adjacent to the development on the Greenwich side of Deptford Creek and would affect the foot/cycleway from Halfpenny Bridge to Norman Road for a period of around 5 years from 2016 to 2021. Although the path would be diverted, it would run through a construction site and Norman Road would have a larger number of lorries than is usual. This would obviously impact on the attractiveness of the route, but it also offers the

possibility of improving the path on reinstatement. I therefore suggest that, if appropriate, both TfL and LB Lewisham make representations at the planning application stage to this effect. It may also be appropriate to seek some pedestrian/cycle improvements to Creekside, towards Deptford Bridge DLR station, to provide an alternative route to the DLR whilst the TTT works are being carried out.

- 5.10.11 It is understood that the Councils Transport Consultant has raised concern over uncontrolled on street parking on Creekside and perceived lack of on-site parking. As discussed at our meeting, TfL continue to support the level of on-site parking proposed as it complies with the London Plan and is constraint based, which is appropriate in such a location in inner London and the nature of the proposal.
- 5.10.12 The area would benefit from a controlled parking zone (CPZ) but we acknowledge the difficulties of introducing one. Therefore a possible compromise is to secure s106 funding to mark out parking bays/double yellow lines, which would provide a degree of control and could be readily converted to a CPZ should levels of on-street parking become an issue. Securing a car club space and three years free membership for new residents through the s106 agreement would also help reduce on-street parking demand.
- 5.10.13 As discussed, it is for boroughs to monitor travel plans if they so wish as TfL do not have resources to do so. The travel plan submitted with this planning application passes the ATTrBuTE tool (which covers content rather than detailed methodology) so we have no further comment on this and you would be best placed to determine if the monitoring, targets and penalties are appropriate. We do support a site wide travel plan coordinator.
- 5.10.14 London Buses do not consider that the development would have an adverse impact on bus service capacity and, as we discussed, the nearest bus stops on Deptford Church Street are of acceptable quality and TfL no longer routinely request developer funding countdown signs. As such we believe s106 funding would be better focussed on improving walking and cycling routes in the vicinity of the site, signage, on-site public transport information, informal on-street parking control and car club provision.

5.11 Environment Agency

Initial Comments: We have reviewed the submitted plans and, with respect to flood risk management and groundwater protection, we are satisfied that our concerns can be addressed through planning conditions.

- 5.11.1 However, we are disappointed to note that the proposals include minimal measures to enhance the ecological value of the Creek. We would strongly recommend that the plans be revised to increase the extent of the proposed ecological enhancements to the river wall at the site. Engineered river channels are one of the most severe examples of the destruction of ecologically valuable habitat. We seek to restore and enhance watercourses to a more natural channel through new development wherever possible.
- 5.11.2 The National Planning Policy Framework (NPPF) paragraph 109 requires local planning authorities to aim to conserve and enhance biodiversity when determining planning applications by minimising impacts on biodiversity and providing net gains in biodiversity where possible. Paragraph 118 of the NPPF

states that opportunities to incorporate biodiversity in and around developments should be encouraged.

- 5.11.3 In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. The proposal could prevent the recovery of the waterbody to good potential if it does not take the opportunity to ecologically enhance the majority of the concrete Creek wall.
- 5.11.4 This position is supported by Lewisham Council Core Strategy Policy 11 – River and waterways network which seeks to ensure that the biodiversity value of Deptford Creek is preserved and enhanced.
- 5.11.5 We ask that the applicant submit a scheme demonstrating how the watercourse would be enhanced to a more natural state and maintained as such thereafter. The current proposals refer to a project under a Section 106 agreement to enhance a relatively restricted section of the Creek wall. Rather than a separate project we would recommend that the enhancements be included in the development proposals. Consideration should be given to setting back a section of the floodwall to create intertidal habitat. Additionally, the proposed timber fendering to the Creek wall should be increased in extent to include all ecologically poor sections of the Creek wall. We ask that this scheme for the ecological enhancements be submitted with the planning application and be undertaken within the development.
- 5.11.6 We ask to be re-consulted on the information we have requested above. Should we be able to resolve our concerns on that basis then we would recommend the imposition of conditions to be included on any subsequent approval.
- 5.11.7 Flood risk management - We are satisfied with the assessment of flood risk provided and with the proposed mitigation for the residual risk of tidal flooding.
- 5.11.8 The Furness Partnership report on Creek wall failure and repair methods is based on an assessment of existing information and states that details of the river wall construction would need to be confirmed on site. Based on the assumed details in the report, we are satisfied with the methodology put forward demonstrating that the building setback is sufficient to allow future maintenance of flood defences.
- 5.11.9 Surface water drainage - We are pleased that the drainage strategy offers a significant reduction in discharge to the combined sewer, and includes brown roofs. Further benefit could be derived by providing attenuation for the part of the site discharging to the combined sewer, to reduce discharge at times of peak flow. Pumping of surface water is undesirable because of the energy requirement and the introduction of an additional failure mode, which could result in localised flooding. Under normal conditions the part of the site discharging to Deptford Creek would be able to discharge by gravity, so pumping should only be used when levels in the Creek prevent discharge by gravity. It may be feasible to avoid pumping altogether by providing attenuation to store runoff until levels in the Creek have dropped.
- 5.11.10 Whilst the general principles of the Sustainable Urban Drainage System (SUDS) hierarchy is not in question, we cannot at this point approve of the use of infiltration systems at this site due to a lack of information on the ground conditions. The site lies within a sensitive area with regard to groundwater as it falls

within the Source Protection Zone for the Deptford public water supply, has sensitive aquifers beneath and is adjacent to the Deptford Creek. The drainage strategy should be finalised once suitable geotechnical and geo-environmental investigations have been carried out. These would provide the necessary information to demonstrate whether infiltration drainage is suitable or otherwise.

- 5.11.11 There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater. Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system.
- 5.11.12 We have no comments regarding foul water drainage on site as this is proposed to discharge via public sewers.
- 5.11.13 Consideration of these issues, and a detailed design for the drainage system has not been included with the application so, should our concerns with respect to ecology be resolved, we would recommend planning conditions to address surface water drainage.
- 5.11.14 Groundwater protection and contaminated land - We have reviewed the comments regarding contamination in the submitted report 'Geo-environmental Investigation Phase II' (AP Geotechnics Ltd, October 2012). We note the report's conclusions on the risks to the environment, and the recommendations made in the accompanying Environmental Statement to carry out further intrusive investigations to supplement the risk assessment once better access to the whole site is available.
- 5.11.15 Piling - With respect to any proposals for piling through made ground, we would refer you to the Environment Agency guidance and suggest that approval of piling methodology is further discussed with the Environment Agency when the guidance has been utilised to design appropriate piling regimes at the site.
- 5.11.16 Should our concerns with respect to ecology be resolved, we would recommend planning conditions to address the risks to groundwater posed by historic contamination and the use of piling.
- 5.11.17 **Final comments:** We wish to support the proposed ecological enhancement to the Creek wall, although we are disappointed that the scale of the enhancements doesn't match that of the proposed redevelopment of Faircharm Industrial Estate. Overall, however, we recognise the benefit of focussing on improving the hard metal sheet piles, which can't support any habitat of their own, over enhancing the existing habitat on the softer engineered concrete and brick walls, which are likely to need improving for flood defence in the not too distant future. We therefore consider that the proposal would be acceptable provided the recommended conditions are attached to any permission granted.

5.12 Thames Water

A Safeguarding Direction has been issued by the Secretary of State for Communities and Local Government for all tunnel alignments that form part of the

Thames Tideway Tunnel project. The Council has formally consulted Thames Water on application DC/12/82000/X as it falls within the safeguarded zone for the Greenwich connection tunnel, which forms part of the Thames Tideway Tunnel project. Thames Water's response to the application is provided below:

- 5.12.1 The proposed Thames Tideway Tunnel is the final and most challenging piece of Thames Water's overall plan to tackle sewage discharges into the River Thames in London. The proposed development at Greenwich Pumping Station would intercept the Greenwich Storm Relief Combined Sewer Overflow. The Greenwich connection tunnel would also be driven from Greenwich Pumping Station to Chambers Wharf in the London Borough of Southwark, where it would connect to the main tunnel.
- 5.12.2 Given the applicant proposes a seven storey development in close proximity to the proposed Greenwich connection tunnel, Thames Water requests that a condition be placed on any planning permission requiring details of the design and depth of foundations as part of the proposed piling methodology, to be submitted to and agreed by the local planning authority in consultation with Thames Water, prior to the commencement of development.
- 5.12.3 Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. An Informative is recommended.
- 5.12.4 Piling – a condition is recommended.
- 5.12.5 Water – an Informative is recommended.
- 5.12.6 The proposed development is located within Source Protection Zone 2 of a groundwater abstraction source. These zones are used for potable water sources for public supply for which Thames Water has a statutory duty to protect. Consequently, a condition is recommended.

English Heritage

- 5.13 **Archaeology:** I do not consider that any archaeological fieldwork need be undertaken *prior* to determination of this planning application but that the archaeological position should be reserved by attaching the two recommended conditions to any consent granted under this application.
- 5.13.1 **Heritage:** The Conservation Area Appraisal by Lewisham Council provides a detailed and accurate assessment of the significance of the conservation area. Deptford Creekside is principally significant for its historic development and the 19th century river-related industrial townscape. The area also benefits from its adoption as a local hub for the creative community, historically associated with the art and music scene generated by the Crossfield Estate sub area. Although principally utilitarian in appearance, the juxtaposition of river and railway infrastructure add visual drama to the predominantly functional industrial architecture. However, the APT studios, Dandridge building, Birds Nest PH, and grade II listed railway viaduct demonstrate individual architectural merit. The proposed development site also falls within LVMF View 6.1A from Blackheath Point to St Paul's Cathedral.

- 5.13.2 The building proposed for demolition (Building B) is not considered to make a positive contribution to the character and appearance of the conservation and as such we have no objections to the principle of demolition.
- 5.13.3 In general we would consider the stated design and material approach appropriate. However, in our view the density and scale raises a number of issues which would benefit from further design consideration. These issues are the relationship of the new residential block to Building C, and the appropriate height and configuration of the tall building element and its impact on the setting of designated heritage assets and character and appearance of the conservation.
- 5.13.4 LVMF view 6A.1 identifies both St Paul's Deptford and the rich treescape as adding interest to the view from Blackheath Point. The Visual Management Framework states that there is scope for new development if sympathetic to the character and view. Although developed to avoid directly impinging on the protected vista or directly on St Paul's Deptford, church tower, the proposed development nevertheless significantly erodes the treescape setting within the view. The greater visual separation of St Paul's Deptford to listed buildings on the east side of the Creek and juxtaposition with the 12 storey tower also detract from the historic quality of the view.
- 5.13.5 The conservation area statement identifies the predominant character of the industrial buildings as 2/3 storeys, and the area is not identified as appropriate for tall buildings as set out in Lewisham Core Policy 18. In our view greater height can be accommodated within the site, however the combination of 6 storey and higher elements, is contrary to policy and must be considered to cause harm to the significance of the conservation area and setting of the designated heritage assets. In our view, the proposal must be measured against Policy 134 of the National Planning Policy Framework, which states: Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 5.13.6 The character of the Deptford Creek Conservation Area is finely balanced and the need to ensure a viable future for the site, whilst retaining both the industrial character and wider social benefits of retaining creative industries is complex. We would therefore recommend that the council must be satisfied that any proposed development is the minimum necessary to achieve the above aims, and deliver demonstrable public benefits which outweigh the harm to significance. In establishing the level of appropriate development the opportunity to reduce the impact on the immediate and wider character of the conservation area should be fully explored and the prominence of the tower element reduced.
- 5.13.7 We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request.

NB: The application was revised by way of alterations to the roof of Building 3 and further details provided to show the relationship of the new build to building C following these comments.

- 5.14 Whilst we do not object to the application we wish to see our concern addressed. We have concerns that Japanese rose (*Rosa rugosa*) has been chosen as a proposed species to be planted along the Creek edge as suggested in the Landscape and Public Realm Statement. This species is known to be invasive and as a result has been placed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) to indicate its invasive nature and to ensure that it is an offence to allow the species to occur in the wild. We therefore suggest that it is not planted and replaced with some other shrub species such as a native rose like burnet rose or sweet briar (*Rosa spinosissima* or *R. rubiginosa*). In addition, red valerian (*Centranthus ruber*) can be invasive under certain conditions and although this species is common along Deptford Creek it is discouraged that additional planting of this species should be undertaken (see wildflower planting recommendations below).
- 5.14.1 The Trust promotes the use of green infrastructure where possible and we recognise that there are going to be a number of brown roofs (with natural colonisation) and additional greenspace improvements including bird and bat boxes and a planted wildflower area. Having reviewed the Landscape and Public Realm Statement and Design and Access Statement we note the possibility for the installation of green walls in some locations. Well designed green walls supporting an appropriate mix of plants can attract a wide variety of invertebrates and can also provide breeding locations for bird species such as wren and blackbird thus can increase significantly the biodiversity value of a given development area with limited ground level space.
- 5.14.2 The Trust also believes that the proposed planting for the wildflower area is somewhat limited and would like to see a more diverse mix of species included than those given in the Landscape and Public Realm Statement although we welcome the proposed addition of species typically considered as 'weeds' such as the hawkweed oxtongue to be included in the mix. Other species we would suggest are common toadflax (*Linaria vulgaris*), rough hawkbit (*Leontodon hispidus*), common knapweed (*Centaurea nigra*), and white campion (*Silene alba*).
- 5.14.3 Although not derived from Deptford due to an erroneous identification, the Deptford pink (*Dianthus armeria*) may be a good addition to the wildflower area because it has become associated with the area. If this was to be introduced a small interpretation board explaining its relationship with Deptford would be a good feature.
- 5.14.4 Based on the above information, London Wildlife Trust would like to see Lewisham Council encourage the developers to address our concern and in addition look at further enhancing their proposed green infrastructure.

Secure by Design

- 5.15 The proposed site location and mix of uses mean that a site management plan would be recommended. It would be suitable for Secured by Design accreditation. CCTV in conjunction with good lighting would be recommended.

Port of London Authority

- 5.16 **Pre application comments:** The location of the navigational channel means that the PLA would not wish to see permanently moored vessels along a large section

of the application site boundary. The only location that would be acceptable from a navigational perspective would be between the existing rail bridge and the DLR.

- 5.16.1 However, any permanently moored vessels in this area would appear to be challenging given the constraints in this part of the Creek. The riverbed dries and at low tide there is between 3-5m of foreshore. A level, stable bed would need to be created for any vessels to moor on and this could potentially involve levelling, dredging or the use of timber grids. The environmental impacts of all of these options would need to be investigated and appropriate mitigation provided.
- 5.16.2 Any vessels would need to be moored close to the flood defence wall (out of the navigable channel) with a safely constructed and maintained gangway or similar. The moorings and access should be capable of withstanding the hydrodynamics associated with the Creek emptying over the tidal cycle. Discussion would need to be had with the EA concerning any access over or through the river wall.
- 5.16.3 Appropriate services/utilities would need to be provided to the vessels. This would need to include water and electricity provisions. Arrangements would also need to be in place to dispose of any waste to shore.
- 5.16.4 It is understood that the Creekside Centre use an access point adjacent to the site to access the foreshore. Careful consideration would need to be given to the implications of locating vessels in this area.
- 5.16.5 **Initial comments:** The PLA has no objection to the proposed development. It is noted that an Environmental Management Plan is to be produced. Given the proximity of the development to the Creek and to the Thames the EMP should give specific consideration to the use of the river for the transport of construction materials to and waste materials from the application site. The use of the river is a sustainable method of transport that has policy support from national level downwards. Given the location of the development details of all external lighting should be required to be submitted by condition. The lighting should be designed to minimise light overspill to the Thames.
- 5.16.6 **Final comments:** Thank you for consulting the PLA about the proposed installation of ecological fenders to the existing steel sheet piles at Faircharm Trading Estate. The PLA has no objection to the proposed development. It is recommended that there is a management regime for the maintenance of the fenders. The applicant is advised that they would need a River Works Licence from the PLA for the proposed fenders.

Greenwich Council

- 5.17 Greenwich Council express concern on the excessive height of the proposed development and the detrimental impact it would have on the protected vista from Blackheath Point.
- 5.17.1 St Paul's Cathedral and the towers of St Paul's are integral to the viewer's ability to recognise and appreciate the landmark, and the viewing corridor of the protected vista from Blackheath Point incorporates these features.

The proposal is therefore contrary to Policies D25 and D26 of the Greenwich adopted Unitary Development Plan 2006, and the Revised Supplementary Planning Guidance, London View Management Framework (March 2013). It is

further considered that the views of English Heritage and the Mayor of London should be sought

Strategic Housing

- 5.18 The proposed mix is generally okay and the layout of the units is acceptable. The affordable units form only 14% of the scheme. An assessment of the viability documentation would be required. Is there an RP on board? If not, we need to see the rents assumed in the viability assessment.

Public Realm and CCTV Manager

- 5.19 This development would have NO impact on the boroughs CCTV microwave transmission system. Therefore no objection raised.

Sustainability Manager

- 5.20 **Initial comments:** The proposals aren't fully compliant with adopted policies. The offices are only proposing to meet BREEAM 'Very Good' whereas our policy requires BREEAM 'Excellent'. In relation to the energy centre, it's hard to see what has been done to protect it against future flood risk.
- 5.20.3 **Final comments:** If the EA are happy with the flood risk stuff then that's fine. The rationale for not meeting the BREEAM standard seems insubstantial.

Highways and Transportation

- 5.21 Following the additional information presented on parking demand, the overall standard of assessment is good. The Councils Highway Consult has identified one or two minor issues of potential bias within their report, but adequately accounts for this in the accompanying narrative.

All of the key issues have been addressed, the proposal is considered to be acceptable and we support the inclusion of the conditions including those relating to:-

- A contribution to cycle/pedestrian routes;
- Restricted hours for construction traffic;
- Provision of a travel plan;
- Cycle parking;
- Highway repairs; and
- Contribution to CPZ (including restricted access to future permit scheme).

- 5.21.1 The outstanding issue of concern is the potential shortfall in parking capacity. This is due to an accumulation of factors, not just the redevelopment of this site and therefore it would not be reasonable to refuse planning permission for this reason.

Environmental Health

- 5.22 **Air Quality Officer:** The application is acceptable from an air quality perspective. My only comment would be in relation to the use of Creekside by HGVs during the construction phase. I think this is more of a transport and road safety issue but Creekside is a cycle route and think that the additional risk of HGVs and cyclists meeting on this narrow road needs to be addressed. I'm not sure if there could be a requirement for all HGVs accessing the site to be fitted with appropriate sensors? The other thing on this is to secure ease of access/egress from the development site to Creekside for cyclists on completion.
- 5.22.1 **Pollution Officer:** The report provided for the assessment of noise is very good. Conditions are recommended.
- 5.22.2 **Land Contamination Officer:** I would request that the standard contamination condition is attached to any permission, and that the EA are fully consulted.

Ecological Regeneration Manager

- 5.23 **Initial comments:** There is a need to carry out an appropriate ecological survey of the Creek as part of the Environmental Statement so that the Local Authority can have an up to date and relevant assessment of the ecological quality and biological sensitivity. The Creek is a receptor and there is a risk of contamination resulting from foundation piling and removal of hard standing. An up to date survey of invertebrate species and microorganisms, from appropriate & identified positions in the Creek should be a fundamental requirement. This study should include an assessment of quality and species abundance that can provide an agreed base line.
- 5.23.1 From an ecological standpoint this EIA is not fit for purpose as it has not sufficiently looked to build a site specific and solid evidence base that would enable a picture and understanding of the ecological context to the site to be made. **NB: In response to this initial view of the ES an Addendum was submitted.**
- 5.23.2 The 'Landscape and Ecology Advice for the Proposed New Landscape at the Faircharm Creative Quarter by Creekside Education Trust Ltd October 2012' is a balanced and useful document. I am encouraged by the objectives and approach which marries careful considered/informed management with education and engagement. This document contains some very good ecological proposals and if carried out fully would help to compliment the wider landscape and ecology of the Creek. For this proposed mitigation to work the careful considered/informed management has to be married to appropriate post development monitoring. An ecological management plan should be secured that sets out a process and methodology for monitoring the development of wildlife habitats post development. This plan needs to ensure that an annual monitoring report is produced that formally reviews the management, identifies success but also problems/issues and how to address these. The monitoring report should detail new species that have colonised, developments in management technique, events, and future ideas. It should be designed so that people can be informed by it and so that it can become a learning tool and help inform about what is happening and how residents and workers can engage with the process.
- 5.23.3 Regarding the planning application to attach fenders to the existing steel sheet piles, in principle, I am encouraged by the commitment to carry out an ecological

enhancement on the Creek walls but I would not want the inclusion of this to compromise the quality of the terrestrial landscape mitigation. This is because Creek wall enhancements would take many years to mature and develop ecological value. They are therefore a long term augmentation, the terrestrial landscape mitigation would be more immediate and therefore, of greater impact and value for wildlife/residents/workers. I believe that there is a design fault in the current proposed fender specification and suggest/recommend that the applicant consult with the Creekside Education Trust who are able to advise on the latest guidance and what would work in that specific location. **NB: In response to this initial view of the design of the fenders a revised design was submitted.**

- 5.23.4 **Final comments:** I can confirm that in the addendum the applicant has updated the Baseline Section of Chapter: 14 Ecology of the 2012 ES. They have included a more detailed botanical species list for the Creek. They have also provided records for bird fauna, such as kingfisher, starling, herring gull, hedge accentor, common linnet and house sparrow. They have mentioned that the habitats provided by Deptford Creek would also be of value to invertebrates within the Creek and that this provides foraging opportunities to bird species, and refer to, 'a range of invertebrates such as tubifex worms' within the exposed mud that provide foraging opportunities to bird species.
- 5.23.5 Although, the ES has mentioned invertebrates and this associated food web, which is good, I am disappointed that a more detailed invertebrate and micro-organism species list has not been referenced that can act as an agreed baseline, especially as these organisms support the Creek's function as a nursery area for fish. This would be the ideal in terms of understanding the context of the development and would have better informed the assessment of the level of risk/impact should a pollution pathways be opened or accident occur that the Construction Environmental Management Plan or Foundation Works Risk Assessment fail to adequately address.
- 5.23.6 Pragmatically the critical factor is to protect the ecological integrity of the Creek; to understand the likely risk and to have robust management arrangements in place so that these risks are minimal and shown to be negligible. The Construction Environmental Management Plan and Foundation Works Risk Assessment is promoted and promised as the mechanisms in which this can be achieved.
- 5.23.7 Although I consider the omission of invertebrate/micro-organism information is unfortunate in terms of the ES. This is because (all be it remotely) there is a possibility of pollution derived from the development might enter the food chain via invertebrates/microorganisms and that this in turn might have a cumulative effect the ecology of Deptford Creek a designated SINC of Metropolitan Interest (SMI). I do appreciate that the applicant can demonstrate that they have done an assessment of the ecology of the Creek, as legally required and that they do acknowledge its ecological importance in the ES. Although the ES has achieved the legal minimum it could have been more robust and thorough by including this information. In terms of protecting the ecological integrity of the Creek they have proposed that the Construction Environmental Management Plan and Foundation Work Risk Assessment can be used to achieve this.

As part of the formation of these documents and procedures we need to ensure that they take account of the ecological sensitivity of the Creek and require them

by way of Condition to demonstrate a greater understanding of the relationship that the invertebrate fauna, and other micro- organisms present have in supporting the wider ecology such as the fish nursery and birds. These documents need to show this level of understanding in order to make an informed and effective assessment and for them to be able to present a reasonable response to all the potential impacts and risks.

Lewisham Design Panel

- 5.24 The proposal is now at application stage and as this was the third time coming to the panel, the architect's presentation focused on the design development that has occurred since the last review.
- 5.24.1 In general, the panel are more positive about the proposal and feel that through the most recent work by the architects, much of the previous concerns have or are in the process of being addressed. In particular, the panel welcomes the widening of the St Paul's viewing corridor, the more sophisticated approach to the roof design and the detail design development that is focusing on retaining the area's industrial character. However, the panel still has concerns that hopefully can be addressed as part of the ongoing application process – namely regarding phasing and use, as well as design details and landscaping.
- 5.24.2 At previous reviews, the panel's main concerns focused on the character of place that was being created – especially in regards to the new build elements. Since the previous sessions, much work has been done by the architects to develop the detail of the architectural design. Because of this work, the proposal is much more successful in achieving the gritty, post-industrial character that the architects desire. While the panel appreciate this approach, we raise caution that a careful balance must be struck. Not only should the area retain and in fact celebrate its industrial atmosphere, but it also needs to be an optimistically designed development that lifts the social aspirations of the area.
- 5.24.3 In more specifics, the panel are interested in the idea to involve an artist in order to further bring out the quality of place. While this idea has merit, it is important that the artist does not become too literal and that the project work is fully integrated in the architecture. The artistic element or signage should be understated and sophisticated and not just another unneeded layer. For instance, looking at the precedent images provided, the panel are more impressed when elegantly sculpted staircases were utilized for "signage" purposes, rather than just graphic art.
- 5.24.4 The Panel also considers that the character of Creekside is as much about its culture and people as its buildings. Phasing and decant arrangements to enable existing tenants to keep working and remain at Faircharm is therefore important. In addition to Workspace's ideas to take up unused space at next door Cockpit Arts, the Panel suggests renting a nearby building as temporary decant space.
- 5.24.5 Since the first review, the panel has welcomed the retention of the existing building A and building C and we were happy to finally see some of the detail design for these structures. Although the Panel is generally supportive of the approach being taken to the retained buildings, we have reservations about the ground floor front elevation to building C.

- 5.24.6 While the new entrance block to building A is felt to be a delightful new addition, whose treatment, rhythm and structural details create a sophisticated contrast between old and new, the retained wall with new punched windows on building C appears to be a left over mistake. The panel accepts that the altered ground floor elevation represents the evolution of the building, and the associated logic of retaining it with new windows, yet it is still thought to be a negative element. This is a very important frontage and it is thus felt that another think about this elevation is needed. Therefore the Panel urges that alternative options that remove this wall and create a new frontage along this edge should be considered.
- 5.24.7 As in previous reviews, the Panel feels very strongly that the development should not be gated and that maximum accessibility to the river is one of the most positive attributes of the proposal. Thus, we are heartened to hear the new security strategy that moves away from plans for a gated development and instead uses the layout to maximise surveillance. This security strategy needs to be enshrined in any approved application.
- 5.24.8 The panel welcomed much of the detail design work that is being undertaken, as well as the proposed materials. The Panel is pleased that the design of the application would be secured at stage D+. However, we remain concerned that the proposal could become quite expensive scheme and wonder what measures would ensure that such design is it is not value engineered at a later date. The panel understand that the architects are being retained through the S106 agreement – this is a welcomed approach and hopefully it would achieve the success that is needed.
- 5.24.9 Of all the information provided, the Panel are least impressed with the landscape proposals and feels that more work and information is needed – especially in regards to the soft edge treatment along the Creek. Extending the planting palette adopted for the Creekside Education Centre is not considered convincing; the two sites might be neighbours but the context of each was thought different. Not only might this space be too soft for the proposal, yet it is also unclear on how would this space actually be used and appreciated. Essentially, how would it not become a left over space filled with crisp packets?
- 5.24.10 Some ideas in the landscape strategy are thoroughly welcomed – in particular – the opportunity to re-use some of the saved elements, such as the creation of a viewing platform made from an existing staircase and the retained water tower. Yet more information is needed on how these structures would be maintained. Likewise, the Panel appreciated the continuous space along the Creek edge. Yet it is thought that this flow of space could be improved by moving the two parking spaces in the south east corner.
- 5.24.11 Finally, the panel did not understand the proposal's plan for the public realm on Creekside – this area would greatly define the entrance to the area and thus needs more thorough investigation.

6 Policy Context

Introduction

- 6.22 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

6.23 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.

6.24 The development plan for Lewisham comprises the Core Strategy, Development Plan Document (DPD) (adopted in June 2011), those saved policies in the adopted Lewisham UDP (July 2004) that have not been replaced by the Core Strategy and policies in the London Plan (July 2011). The National Planning Policy Framework does not change the legal status of the development plan.

National Planning Policy Framework (NPPF)

6.25 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14 a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary this states that (paragraph 211), policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. In summary, this states, that for a period of 12 months from publication of the NPPF decision takers can give full weight to policies adopted since 2004 even if there is limited conflict with the NPPF. Following this period weight should be given to existing policies according to their consistency with the NPPF.

6.26 Officers have reviewed the Core Strategy and saved UDP policies for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraphs 211, 214 and 215 of the NPPF.

Ministerial Statement: Planning for Growth (23 March 2011)

6.27 The Statement sets out that the planning system has a key role to play in rebuilding Britain's economy by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible. The Government's expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy.

Other National Guidance

6.28 The other relevant national guidance is:

Planning and Access for Disabled People: A Good Practice Guide (ODPM, March 2003)

Safer Places: The Planning System and Crime Prevention (ODPM, April 2004)

Guidance on Tall Buildings (English Heritage/CABE, July 2007)

Code for Sustainable Homes Technical Guide (DCLG/BRE, November 2010)

London Plan (July 2011)

6.29 The London Plan policies relevant to this application are:

- Policy 1.1 Delivering the strategic vision and objectives for London
- Policy 2.1 London in its global, European and United Kingdom context
- Policy 2.2 London and the wider metropolitan area
- Policy 2.3 Growth areas and coordination corridors
- Policy 2.5 Sub-regions
- Policy 2.9 Inner London
- Policy 2.13 Opportunity areas and intensification areas
- Policy 2.14 Areas for regeneration
- Policy 2.18 Green infrastructure: the network of open and green spaces
- Policy 3.1 Ensuring equal life chances for all
- Policy 3.2 Improving health and addressing health inequalities
- Policy 3.3 Increasing housing supply
- Policy 3.4 Optimising housing potential
- Policy 3.5 Quality and design of housing developments
- Policy 3.6 Children and young people's play and informal recreation facilities
- Policy 3.8 Housing choice
- Policy 3.9 Mixed and balanced communities
- Policy 3.10 Definition of affordable housing
- Policy 3.11 Affordable housing targets
- Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 Affordable housing thresholds
- Policy 3.15 Co-ordination of housing development and investment
- Policy 3.16 Protection and enhancement of social infrastructure
- Policy 4.1 Developing London's economy
- Policy 4.2 Offices
- Policy 4.3 Mixed use development and offices
- Policy 4.4 Managing industrial land and premises
- Policy 4.10 New and emerging economic sectors
- Policy 4.11 Encouraging a connected economy
- Policy 4.12 Improving opportunities for all
- Policy 5.1 Climate change mitigation
- Policy 5.2 Minimising carbon dioxide emissions
- Policy 5.3 Sustainable design and construction
- Policy 5.4 Retrofitting
- Policy 5.5 Decentralised energy networks
- Policy 5.6 Decentralised energy in development proposals
- Policy 5.7 Renewable energy
- Policy 5.8 Innovative energy technologies
- Policy 5.9 Overheating and cooling
- Policy 5.10 Urban greening
- Policy 5.11 Green roofs and development site environs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.14 Water quality and wastewater Infrastructure
- Policy 5.15 Water use and supplies
- Policy 5.16 Waste self-sufficiency
- Policy 5.17 Waste capacity
- Policy 5.18 Construction, excavation and demolition waste

Policy 5.21 Contaminated land
Policy 6.1 Strategic approach
Policy 6.2 Providing public transport capacity and safeguarding land for transport
Policy 6.3 Assessing effects of development on transport capacity
Policy 6.4 Enhancing London's transport connectivity
Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
Policy 6.7 Better streets and surface transport
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.11 Smoothing traffic flow and tackling congestion
Policy 6.13 Parking
Policy 7.1 Building London's neighbourhoods and communities
Policy 7.2 An inclusive environment
Policy 7.3 Designing out crime
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.7 Location and design of tall and large buildings
Policy 7.8 Heritage assets and archaeology
Policy 7.9 Heritage-led regeneration
Policy 7.11 London View Management Framework
Policy 7.12 Implementing the London View Management Framework
Policy 7.13 Safety, security and resilience to emergency
Policy 7.14 Improving air quality
Policy 7.15 Reducing noise and enhancing soundscapes
Policy 7.18 Protecting local open space and addressing local deficiency
Policy 7.19 Biodiversity and access to nature
Policy 7.22 Land for food
Policy 7.24 Blue Ribbon Network
Policy 7.26 Increasing the use of the Blue Ribbon Network for freight transport
Policy 7.27 Blue Ribbon Network: supporting infrastructure and recreational use
Policy 7.28 Restoration of the Blue Ribbon Network
Policy 7.30 London's canals and other rivers and waterspaces
Policy 8.1 Implementation
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy
Policy 8.4 Monitoring and review for London

London Plan Supplementary Planning Guidance (SPG)

- 6.30 The London Plan SPG's relevant to this application are:
Accessible London: Achieving an Inclusive Environment (2004)
Industrial Capacity (2008)
Housing (2012)
Sustainable Design and Construction (2006)
Planning for Equality and Diversity in London (2007)
Shaping Neighbourhoods: Play and Informal Recreation (2012)

London Plan Best Practice Guidance

- 6.31 The London Plan Best Practice Guidance's relevant to this application are:

Development Plan Policies for Biodiversity (2005)

Control of dust and emissions from construction and demolition (2006)

Core Strategy

- 6.32 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together with the London Plan and the saved policies of the Unitary Development Plan, is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Objective 1 Physical and socio-economic benefits

Objective 2 Housing provision and distribution

Objective 3 Local housing need

Objective 4 Economic activity and local businesses

Objective 5 Climate change

Objective 6 Flood risk reduction and water management

Objective 7 Open spaces and environmental assets

Objective 8 Waste management

Objective 9 Transport and accessibility

Objective 10 Protect and enhance Lewisham's character

Objective 11 Community and well being

Spatial Policy 1 Lewisham Spatial Strategy

Spatial Policy 2 Regeneration and Growth Areas

Core Strategy Policy 1 Housing provision, mix and affordability

Core Strategy Policy 3 Strategic Industrial Locations and Local Employment Locations

Core Strategy Policy 7 Climate change and adapting to the effects

Core Strategy Policy 8 Sustainable design and construction and energy efficiency

Core Strategy Policy 9 Improving local air quality

Core Strategy Policy 10 Managing and reducing the risk of flooding

Core Strategy Policy 11 River and waterways network

Core Strategy Policy 12 Open space and environmental assets

Core Strategy Policy 13 Addressing Lewisham's waste management requirements

Core Strategy Policy 14 Sustainable movement and transport

Core Strategy Policy 15 High quality design for Lewisham

Core Strategy Policy 16 Conservation areas, heritage assets and the historic environment

Core Strategy Policy 17 The protected vistas, the London panorama and local views, landmarks and panoramas

Core Strategy Policy 18 The location and design of tall buildings

Core Strategy Policy 21 Planning obligations

Site Allocations

- 6.33 The Site Allocations Document identifies the Creekside Local Employment Location (LEL) under allocation SA13.
- 6.33.1 Site SA13 lies on both sides of Creekside and includes quite a dense group of 19th and 20th century buildings, including some open yards. The area has recently been designated as a Conservation Area. Most of the major buildings provide space occupied by small businesses, mainly in the arts and creative industries,

while SA13 also includes Creekside Discovery Centre, an important environmental resource for schoolchildren and others, centred on the study of Deptford Creek.

- 6.33.2 The buildings at the Faircharm Estate, within site SA13, are said to date from the 1950s and evidence shows that their age and condition are such that some costly works of reconfiguration and refurbishment would be required to sustain their long-term attraction as workspaces.
- 6.33.3 The LEL designation derives from Core Strategy Policy 3. Core Strategy (para 7.27) describes LEL sites as the most significant centres of employment space outside the defined Strategic Industrial Locations. LELs consist mainly of better-quality purpose-built industrial/workshop units for which the Employment Land Study identified continuing demand. They therefore offer valuable space for businesses providing local goods and services.
- 6.33.4 Lower Creekside is identified as an LEL in CS para 7.30 and is there described as a significant cluster of creative businesses, albeit in premises that require renovation and renewal.
- 6.33.5 The Site Allocations DPD has been examined in public. The Inspector accepted the allocation for Faircharm as part of the Local Employment Location and concluded that the Lewisham Site Allocations Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework. Consequently full weight should be given to this document in the decision making process.

Unitary Development Plan (2004)

- 6.34 The saved policies of the UDP relevant to this application are:

STR URB 1 The Built Environment
URB 1 Development Sites and Key Development Sites
URB 3 Urban Design
URB 12 Landscape and Development
URB 13 Trees
URB 14 Street Furniture and Paving
URB 16 New Development, Changes of Use and Alterations to Buildings in Conservation Areas
ENV.PRO 9 Potentially Polluting Uses
ENV.PRO 10 Contaminated Land
ENV.PRO 11 Noise Generating Development
ENV.PRO 12 Light Generating Development
ENV PRO 17 Management of the Water Supply
HSG 4 Residential Amenity
HSG 5 Layout and Design of New Residential Development
HSG 7 Gardens
TRN 28 Motorcycle Parking

Residential Standards Supplementary Planning Document (August 2006 updated May 2012)

- 6.35 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, 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.

Planning Obligations Supplementary Planning Document (January 2011)

- 6.36 This document sets out guidance and standards relating to the provision of affordable housing within the Borough and provides detailed guidance on the likely type and quantum of financial obligations necessary to mitigate the impacts of different types of development.

Deptford Creekside Conservation Area Appraisal (2012)

- 6.37 The Deptford Creekside Conservation Area was designated in May 2012 and comprises the area of industrial Creekside south of the railways and the Crossfield Estate.
- 6.37.1 Deptford is one of the oldest settlements in Lewisham. Its location at the Thames and Creek riverside made it naturally the focus of early settlement and industry, with royal associations since Henry VIII. Here, on the banks of the Creek and Thames foreshore lie the beginnings of settlement, industry and urban growth of the borough.
- 6.37.2 Creekside has its origins in the 16th century as a small lane leading to the King's Slaughterhouse on the site of Harold's Wharf (today the APT Studios). The medieval origins of Creekside are still evident in the narrowness of the street and the small urban grain of the wharves at its southern end. Today, the southern part of Creekside is the only remaining historic river-related industrial quarter of significant coherence within Deptford and along the Creek itself. Over recent years, the southern end of Creekside has established itself as a hub for the creative industries. The surviving warehouses located here have proven to be crucial for providing low-cost starter units and accommodating the needs of new businesses, innovation and creative industries which were pushed out by high rentals from the inner-city areas. Creative industries are now concentrated on all the larger premises, of which Faircharm is clearly the dominant provider.
- 6.37.3 The area's layout, buildings, yards and wharves provide evidence of Creekside's historic development pattern and land use, and combine with the spatial qualities of the Creek to create a clear and locally distinct identity.
- 6.37.4 The special interest of the Deptford Creekside Conservation Area lies primarily in its historic interest based on its evidential, historical and communal value.
- 6.37.5 The Deptford Conservation Area Appraisal document describes the character and significance of the conservation area, identifying important street pattern and townscape, open spaces and the importance of the Creek. The document describes buildings of significance and important architectural features and materials and also identifies areas for enhancement.

Draft Tall Buildings Study: An Evidence Based Assessment (2010)

- 6.38 This study is one of the evidence based documents to support Local Development Framework (LDF) policy on tall buildings in Lewisham supporting the Core Strategy. Using the methodology developed by the Commission for Architecture and the Built Environment (CABE) and English Heritage, its purpose is to assess whether particular locations (notably the LDF Lewisham Core Strategy strategic development site allocations, and the Lewisham and Catford town centres) are suitable locations for tall buildings as part of higher density, mixed use regeneration programmes within Lewisham's regeneration and growth corridor areas.

Emerging Plans

- 6.39 According to paragraph 216 of the NPPF decision makers can also give weight to relevant policies in emerging plans according to:
- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
 - The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - The degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given).
- 6.40 The following emerging plans are relevant to this application.

Development Management Plan

- 6.41 The Development Management Local Plan – Further Options Report, is a material planning consideration but is at an early stage of preparation. Public consultation took place during December and January 2013. Therefore, in accordance with the NPPF, the weight decision makers should accord the Further Options Report should reflect the advice in the NPPF paragraph 216.

The following policies are considered to be relevant to this application:

1. Presumption in favour of sustainable development
6. Affordable rent
9. Local employment locations
21. Sustainable design and construction
22. Air quality
23. Open space and biodiversity
24. Landscaping and trees
25. Noise and vibration
26. Lighting
27. Contaminated land
28. Car parking
29. Urban design and local character
30. Alterations and extensions to existing buildings including residential extensions
31. Housing design, layout and space standards
33. Thames Policy Area and Deptford Creekside
34. Public realm and street furniture
35. Designated heritage assets

36. Demolition or substantial harm to designated and non-designated heritage assets

7 Planning Considerations

7.1 The main issues to be considered in respect of this application are:

- a) Environmental Impact
- b) Principle of the Reduction in Employment Floorspace and Provision of Enabling Development
- c) Demolition in the Conservation Area
- d) Proposed Residential Development
- e) Urban Design
- f) Open Space
- g) Highways
- h) Sustainability and Energy
- i) Ecology
- j) Neighbouring Amenity
- k) Planning Obligations
- L) Viability and Deliverability

Environmental Impact

7.2 The application subject of this report falls within Schedule 2, Category 10b (urban development project) of the EIA Regulations. Consequently it has been determined that the submission of an Environmental Statement is a necessary requirement for the full and proper consideration of the environmental impact of the proposed development (as amended).

7.2.1 The Council cannot grant planning permission for any development which is required to be subject to EIA unless it has first taken the environmental information into consideration. The environmental information means the original ES, the ES Addendum, 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 subsequently submitted ES Addendum is considered below and responses to consultations and other representations are also considered elsewhere in this report.

7.2.2 The Council appointed consultants Capita Symonds to advise it on EIA issues and to help Officers scrutinise technical material prepared by the applicant.

Scoping

7.2.3 A formal Scoping Opinion was issued pursuant to Regulation 13 in December 2011.

7.2.4 At the scoping stage it was agreed that delivering redevelopment of the Faircharm Estate could have significant adverse effects for existing neighbouring residents, and for users of (1) adjacent commercial buildings and (2) the Creekside Centre. These effects could include changes to noise levels and to levels of air pollution, as well as changes to views, the general townscape and the newly-designated Deptford Creekside Conservation Area.

- 7.2.5 With the introduction of appreciably taller buildings within the site, it was clear that changes to the local microclimate (via changes to patterns of wind, and changes to the very local availability of daylight and sunlight) could also occur. The construction of deep foundations in previously contaminated soil could also affect the quality of the water environment, including Deptford Creek and its associated ecosystem.
- 7.2.6 The same factors that might affect neighbours would also affect the environment to be experienced by future residents and users of the commercial element of the site. The reduction in commercial space (due mainly to the demolition of one of the existing buildings, and parts of others) combined with an intensification of use of the remaining commercial space, and the introduction of about 246 new residents, could also be expected to be reflected in changes in employment, and in demand for social infrastructure, including school places and health care.
- 7.2.7 All of these factors, together with consideration of changes to flood risk and effects on local patterns of transport, were identified at the EIA scoping stage as requiring assessment. In framing its EIA scoping opinion, LB Lewisham asked that when on-site effects were being considered, greater weight should be given to the absolute suitability of on-site conditions for new residents than to the magnitude of change from current conditions.
- 7.2.8 As originally submitted the ES was not considered to properly assess the environmental effects of the development as required by the scoping opinion. Consequently an Addendum was submitted on 21st March 2013 (by email, hard copy submitted 2nd April 2013).
- 7.2.9 In accordance with the EIA Regulations the additional material received (ES Addendum) was advertised in the local press on 3rd April 2013.

Environmental Impact Assessment

- 7.2.10 Overall the ES and subsequent Addendum is considered to be appropriate and correct. The Council's consultant (Capita Symonds) has confirmed that greater clarity or additional information would not change the overall conclusions of the ES and therefore the document is fit for purpose and can be used to properly assess the environmental impact of the development.
- 7.2.11 The ES and subsequent Addendum has addressed all of the topics that would be expected to be considered when undertaking an EIA of the type of development proposed and adequately assesses the likely significant effects. All sections include information on mitigation measures where appropriate. The one topic where the ES could helpfully have provided greater detail is ecology. Although an assessment which acknowledges the importance of Deptford Creek to local ecological quality has been made, the ES relies for its conclusions on the adoption and use of a Construction Environmental Management Plan (CEMP) which would require some further ecological assessment before it can be completed and approved, which would be secured via a pre-commencement planning condition.
- 7.2.12 The ES comprises the following documents:
- Non-technical Summary Addendum
 - Environmental Statement and technical appendices
 - Environmental Statement Addendum and technical appendices

7.2.13 The ES and subsequent Addendum contains the following chapters:

- Introduction
- Assessment Methodology
- Existing Land Use and Activities
- Alternative and Design Evolution
- Proposed Development
- Development Programme, Demolition and Construction
- Socio-economics
- Transport and Access
- Air Quality
- Noise and Vibration
- Ground Conditions and Contamination
- Townscape and Visual
- Archaeology and Built Heritage
- Water Resources and Flood Risk
- Ecology
- Wind
- Daylight, Sunlight and Overshadowing
- Cumulative Effects
- Summary of Residual Effects

7.2.14 In line with statutory requirements the ES provides a description of the main alternatives to the proposed development considered by the applicant. These include a 'do-nothing' scenario as well as various design alternatives.

Development Programme, Demolition and Construction

7.2.15 The ES states that it is estimated that the development would be built over 3 years including demolition, other enabling works and construction. It is anticipated that development would commence in 2014. In order to manage the potential environmental effects typically associated with demolition and construction, a site specific Construction and Environmental Management Plan (CEMP) would be developed and implemented throughout the duration of the works. This would specify a range of measures to manage the environmental effects that could arise and would provide details of controls for dust, noise and vibration, waste management, dealing with hazardous materials and archaeological resources.

7.2.16 It is considered that the environmental effects of demolition and construction can be adequately addressed through a CEMP and controlled working hours for construction. This would be controlled by condition.

Socio-economics

7.2.17 The ES states that development would be likely to generate a number of employment opportunities. With jobs created both during the demolition and construction phase and once the development is complete. The new workspace would be expected to accommodate 331 jobs, an increase of 192 jobs. Additional spending by those working and living within the development would further benefit the local economy.

- 7.2.18 The ES states that the development would provide 148 new residential units, a proportion of which would be affordable. This number of units is likely to accommodate 246 new residents which would be expected to generate an increased demand for local health and educational facilities. The ES suggests that secondary schools and community facilities have sufficient capacity to accommodate the likely new demand for these services.
- 7.2.19 The ES states that there is no public open space within the site. The development would create new public open space and residents would have access to a variety of amenity space, both communal and private.
- 7.2.20 It is considered that the socio economic effects have been properly assessed. The redevelopment of the Faircharm Trading Estate would involve both a loss of employment floor space and a significant intensification in the way in which the remaining space would be used in future, in part by providing more natural light to the remaining space. The ES provides a report of current employment levels and an estimate for the number of future jobs that may be created. Current employment amounts to 1 job per 66m² (after some leases had already been terminated) whereas future employment is estimated on the basis of 1 job per 10m². It would be prudent to assume that the net gain in employment could be less than is suggested in the ES but a significant increase in employment is likely and s106 obligations would be used to secure a package of employment benefits as part of the proposal.
- 7.2.21 The effects associated with displacement of existing businesses would be mitigated through the provision of a Business Continuity Strategy, the details of which would be discussed in later sections of this report. The BCS would be secured via the s106 agreement.
- 7.2.22 The residential units are likely to deliver a population of close to the 246 estimated in the ES, and the demand for school places and play space has been assessed. The impact of the development on education, health and other infrastructure requirements would be mitigated via necessary and appropriate s106 obligations as set out in the s106 Head of Terms in later sections of this report.
- 7.2.23 The effects of reducing the number of on-site parking spaces by 53% (from 60 to 28) while boosting employment and introducing new residents are considered within the Transport Assessment.

Transportation and Access

- 7.2.24 The ES and Transport Assessment contains a detailed study of the development on local roads, public transport, pedestrians and cyclists. It is stated that construction vehicles would be likely to average approximately 90 (one way) trips per day which accounts for only 55 percent of the total daily vehicle trips estimated for the development once fully operational. The implementation of a Construction Environmental Management Plan and Logistics Plan would minimise the effect of construction traffic. It is stated that the effect on the highway network would be negligible.
- 7.2.25 The ES states that the completed development and immediate area surrounding the site would include an enhanced pedestrian environment. An assessment of the effects of the additional trips generated by the development concluded that the

DLR, train and bus networks, together with the local highway network would have adequate capacity to deal with the relatively insignificant increase in demand.

- 7.2.26 It is considered that the transport effects have been properly assessed. The traffic figures in the ES, for current baseline conditions, future no-scheme baseline conditions, and future Faircharm-plus-cumulative-schemes traffic, are consistent with those in the Transport Assessment. The ES provides an assessment of the current Public Transport Accessibility Level score ('good') and Pedestrian Environmental Review System score ('well maintained and of a good quality').
- 7.2.27 The biggest changes from current conditions (including very substantial increases in traffic levels and peak hour vehicle queues on Creekside) are attributed to other development schemes, not to the Creekside Creative Quarter development. Nevertheless, the Creekside scheme would increase by about 246 persons the number of residents who would be exposed (as pedestrians, cyclists and occasionally drivers) to the acknowledged future local congestion, as would users of and visitors to the employment units.
- 7.2.28 When the assessment was done, it was not known that the Thames Tideway project would propose two nearby work sites, on Deptford Church Street (south of St Paul's church) and at Greenwich Pumping Station (on the other side of Deptford Creek), which could also generate significant construction traffic at much the same time that Faircharm could be being re-developed. The planning applications for those work sites were submitted after the application for Faircharm, and have not yet been considered for approval. However, the cumulative impact of any traffic resulting from the tunnel project can be addressed as part of the construction logistics plans for Faircharm, when more details regarding timing of implementation are known.
- 7.2.29 Mitigation measures stated in the ES such as a Construction Logistics Plan, Travel Plans, Delivery and Servicing Plan, Car Park Management Plan and necessary and appropriate contributions towards transport and public realm to mitigate the impact of the development would be secured by conditions and the s106 agreement.

Air Quality

- 7.2.30 The ES states that an air quality assessment has been undertaken to assess the likely effects of development on local air quality.
- 7.2.31 The ES considers that the main effect during demolition and construction on local air quality relates to dust which would be most likely to be generated from demolition activities and enabling works. It is stated that a range of best practice environmental controls would be implemented to minimise dust emissions thereby reducing the potential for nuisance. These measures would form part of the CEMP. However, even with mitigation in place to minimise effects it is difficult to completely eliminate such effects. Consequently the overall effect of dust upon nearby receptors is considered to be minor to major in the very worst case. However, these effects would be temporary and would depend on the type of work being undertaken.

- 7.2.32 The ES states that the effects of vehicle emissions during construction would be minor adverse during peak construction phases but negligible at all other times.
- 7.2.33 It is considered that the air quality effects have been properly assessed. The ES considers the potential effects of dust from construction, and emissions from traffic and heating plant. The site itself lies within an Air Quality Management Area (AQMA), but air quality conditions on Creekside are better than those on major roads in the area. This point was confirmed by monitoring carried out as part of the EIA process. Nevertheless, the monitoring established that close to the site access point, annual mean values for nitrogen dioxide are currently close to the 'objective' value set for the AQMA.
- 7.2.34 Substantial protection from construction dust would be provided to existing residents on the western side of Creekside by the retention of existing buildings within the Faircharm Trading Estate. The buildings to the immediate north and south of the site are not residential, and the site on the other side of Deptford Creek may become a Thames Tideway work site. It is unlikely that any new residents would move into the Faircharm Creative Quarter while significant earthworks or similar dust-generating activities are going on elsewhere on site. Further protection would be provided by the existence and operation of a site-specific CEMP, which should include provisions for dust monitoring and reporting, as well as procedures for dealing with any complaints.
- 7.2.35 There is expected to be an energy centre on the ground floor of the tallest of the new buildings, which would allow the emissions to be discharged at a high level, achieving good dispersion over a wide area.
- 7.2.36 The ES does not consider that any air quality effects would be significant, and Waterman confirmed at a meeting with LB Lewisham that full account was taken in the ES of the future traffic conditions on Creekside, most of which would not be attributable to Faircharm itself, but which would affect Faircharm residents and workers as well as existing residents of adjacent housing which fronts onto Creekside.

Noise and Vibration

- 7.2.37 The ES states that an assessment of the potential noise and vibration effects of the development was undertaken. The assessment included a monitoring survey at the site to measure the existing noise and vibration levels and an assessment of the suitability of noise condition for new residents. The assessment also considered any potential increase in noise or vibration resulting from the development on local existing and future sensitive receptors.
- 7.2.38 The ES considers the most sensitive existing receptors to be the residential properties to the south and west as well as future residents of the new development. The existing sources of noise at the site include road traffic on the surrounding roads and railway noise from the DLR.
- 7.2.39 Demolition and construction activities would inevitably give rise to some noise and vibration effects to the receptors closest to the site. However, steps would be taken to minimise any vibration through the CEMP, this would include careful selections of modern and quiet plant and machinery, set working hours, traffic management measures and monitoring of noise and vibration levels.

- 7.2.40 The ES concludes that given the existing noise sources surrounding the site, an appropriate choice of materials and design to facades and windows and ventilation for the residential apartments within the proposed development would be required to meet guidance. However, with these design measures internal noise would be sufficiently reduced such that residents would be unlikely to be affected by traffic and railway noise.
- 7.2.41 The ES concludes that the development would generate a negligible amount of additional road traffic noise off-site owing to the low levels of traffic generated by the development. Appropriate design would ensure that the residential accommodation within the development would not be adversely affected by noise from servicing, building plant or noise from commercial use.
- 7.2.42 It is considered that the noise and vibration effects have been properly assessed. As with air quality (see above) considerable protection from the effects of early site works (including demolition and earthworks) would be afforded to nearby residents by the retention of existing buildings which act as a barrier between Creekside and the eastern half of the Faircharm site. Further protection would be provided by the existence and operation of a site-specific CEMP, which should include provisions for noise and vibration monitoring and reporting, as well as procedures for dealing with any complaints.
- 7.2.43 An area of uncertainty concerns the technique(s) to be used for piling. As well as noise and vibration effects, these would have to take account of the potential for spreading pre-existing soil pollution. This can be controlled by condition.
- 7.2.44 Some of the new residential units would be affected by existing road and rail noise (there being raised railway lines to the north and south east of the site), and by deliveries to the employment units (e.g. reversing alarms). The ES assumes that good quality noise attenuation measures (e.g. double glazing and balcony balustrades, as well as good design and operation of heating plant and plant rooms) would be provided in order to deliver an acceptable indoor noise climate. These design features are therefore considered as intrinsic to the scheme's design. Although it is not explicitly assessed, it is clear that noise levels in outdoor areas of the Faircharm Creative Quarter would be appreciable, at least some of the time. Prospective residents would be aware of that, and those who seek a particularly tranquil environment would be unlikely to choose to live at Faircharm.
- 7.2.45 Noise levels associated with building services and plant can be controlled by condition, as can delivery times to the employment units.

Ground Conditions and Contamination

- 7.2.46 The ES states that a ground conditions and contamination assessment was undertaken. The assessment was based on a range of information sources including a desk based Preliminary Environmental Risk Assessment, historical maps, geological maps and results of site walkovers.
- 7.2.47 The ES states that there is potential for contamination to be present on parts of the site owing to current and historical activities most notably from former railway sidings and various industrial works at the site. At present the majority of the site is covered with buildings and hard standing. As such any contamination beneath the site would be largely contained and presents a low risk to present site users.

- 7.2.48 Demolition and construction work would be subject to a range of mandatory legislative health and safety controls. This would prevent construction workers coming into direct contact with ground and sub-surface soils. Such controls would form part of the CEMP, which would also include protective and preventative measures to ensure that contamination risks to underlying soils, ground water and nearby surface water resources would be reduced to a negligible level.
- 7.2.49 Intrusive environmental ground investigation prior to construction of the development would be undertaken. The results of the site investigation would be used to determine more definitively the presence, location and concentration of soil and/or groundwater contamination. The result should be used to determine the precise source of remediation work in addition to appropriate disposal of waste.
- 7.2.50 The ES concludes that on completion of the development, the risk posed to contamination to future occupants would be negligible owing to the implementation of gas protection measures and the fact that significant areas of hard standing within the development would serve to act as a barrier between the contamination source and the potential receptor. In areas where soft landscape or porous landscape finishes are proposed, the sub base below would be tanked to prevent contamination run-off into the Creek.
- 7.2.51 It is considered that the ground conditions and contamination effects have been properly assessed. There is acknowledged to be some pre-existing contamination in the made ground and soil beneath the site, but it is not currently expected to be found to be unusual when further ground investigations are carried out.
- 7.2.52 Chapter 11 of the ES (para 11.61) states that "... based on available information, it is anticipated that groundwater would be influenced by the Deptford Creek and tidal River Thames ...". This is what would be expected, and it means that the groundwater beneath the site is acknowledged to be in continuity with the water in the Creek. Para 11.85 says that "... a direct pollution pathway already currently exists between the Made Ground and underlying aquifers beneath the Site". Given that piling is known to be necessary, these statements appear to be inconsistent with the assertion in para 11.73 that "... no other ecological effects would be likely to arise from the possible presence of contaminated soil or groundwater within the site". However, para 11.87 states (in relation to piling) that "... if properly carried out to high standards of workmanship, there would be no significant disturbance of the surrounding soil. Provided that the pile is formed or placed in intimate contact with the surrounding soil there would be no formation of preferential pathways". This emphasises the importance of a pre-commencement condition covering a comprehensive CEMP, including a Foundation Works Risk Assessment (FWRA).
- 7.2.53 This same point applies to para 11.92, which acknowledges that there would be risks associated with on-site fuel spillages and similar. These could occur at a time when the hard standing has been removed and piling is in process, and avoidance and control measures to address such risks should be built into the site-specific CEMP.
- 7.2.54 It is in this context that the absence of a fuller assessment within the ES of the overall ecosystem of Deptford Creek is regrettable. As a consequence, further work on this subject would be required as part of the FWRA (see above) in order

to understand better which species are of particular value within the wider Creek ecosystem, and therefore in need of strongest protection.

- 7.2.55 The submission of a further, intrusive land contamination assessment would be controlled by condition.

Townscape and Visual Impact

- 7.2.56 The ES states that short term townscape and visual effects arising during demolition and construction are likely to be moderate. Mitigation measures have been identified to minimise any potential adverse effects, the short term effects are of a temporary nature only and are inevitable with any similar form of redevelopment.
- 7.2.57 The ES states the significance of long term townscape and visual effects ranges from not significant to moderate and, where they are noticeable, the effects are generally beneficial. Only one minor adverse effect was identified that being of moderate significance on the townscape quality of the APT building adjacent to the development.
- 7.2.58 The ES states that the development would have minor to moderate beneficial effects on the Lower Creekside industrial character area, the Crossfield Estate character area and the Greenwich Creekside character area, and also on the Deptford Creekside Conservation Area. It would not have any significant effect on any other conservation areas in the vicinity. Its effect on listed buildings is limited to a moderate neutral to beneficial effect on the Deptford Pumping Station and the Victorian Railway Viaduct, a minor neutral effect on the setting of St Pauls Church, and a moderate neutral effect on Mumford's Mill.
- 7.2.59 The ES states that the development would have moderate neutral visual effect on the Strategic View from Blackheath Point to St Pauls Cathedral. It would have no significant effect from UDP Local View Blythe Hill Fields. It would be unnoticeable and have no significant effect on 2 of the 13 other local views identified for assessment. It would have a minor substantial beneficial effect on 8 of the 13 views in which it is noticeable. In one view west across Norman Road of Deptford Pump Station, the development would have a moderate neutral visual effect, whilst in the view from St Pauls Churchyard towards Creekside the effect would be minor neutral. In the view north up Creekside the development would have a minor adverse visual effect because of its poor relationship with the neighbouring APT building, but this can be mitigated.
- 7.2.60 The ES concludes that overall and subject to the proposed mitigation, the townscape and visual effect of the development is considered to be beneficial or neutral. The development would introduce high quality new element of townscape alongside Deptford Creek that is highly appropriate in a mixed use urban area experiencing some significant redevelopment and regeneration.
- 7.2.61 It is considered that the townscape and visual effects have been properly assessed. The original November 2012 townscape and visual assessment was carried out as part of the EIA process but reported in a separate volume of the ES. However, the conclusions were carried forward into the overall ES conclusions, and it clearly formed part of the coordinated assessment. Three further views were then assessed at LB Lewisham's request, and the outcome of that process is reported in the March 2013 ES Addendum.

7.2.62 There are grounds for considering that the substantial changes that would occur to views from (for example) (1) inside and beside the Creekside Centre and (2) east-facing flats on the upper storeys of the Crossfield Estate (on the other side of Creekside, high enough to have longer views over the existing Faircharm buildings) may be regarded by some people as both significant and adverse rather than the beneficial changes suggested in the ES. This is because different people respond differently to architecture, and some may not consider that even well designed buildings enhance a view that is changed so much. It would therefore be more prudent to consider that the proposed development would have some significant visual effects which may be beneficial, neutral or adverse, according to taste.

Archaeology and Built Heritage

7.2.63 The ES states that the potential effect of the development on archaeological remains and built heritage resources within the site and in the immediate surrounding area was assessed. This involved a review of various historical information sources including historical maps and archaeological literature and documentary sources held by the Greater London Site and Monuments Record, specifically for records of previously identified archaeological sites, monuments and finds. Additional information regarding listed buildings, conservation areas and other designations was obtained from the London Borough of Lewisham and English Heritage.

7.2.64 The site is within an Archaeological Priority Area and as such there is potential for buried evidence of interest. The ES states that the existing buildings on site are noted as heritage assets but their heritage value is at the lowest level. The sites main heritage value relates to the palaeoenvironmental deposits that are likely to be buried within the site. These would have been disturbed by 19th and 20th century development of the site but can be expected to be present at depth across the site.

7.2.65 The ES states that there would be potential for the development to affect remains beneath the site where present. However, these effects would be mitigated by implementing a programme of archaeological investigation and preservation by record of any remains that may be discovered, as agreed with the Greater London Archaeological Advisory Service.

7.2.66 The site lies within the Deptford Creekside Conservation Area and listed structures and buildings are present within the vicinity of the site. The ES concludes that effects on these assets range from minor adverse to moderate beneficial; however once mitigation is provided these effects would become negligible.

7.2.67 It is considered that the archaeological and built heritage effects have been properly assessed. The site has not been subject to archaeological or geo-archaeological investigations, but it has been extensively disturbed over the years (not least by a major Victorian brick-built sewer which crosses beneath the site from west to east). The existing industrial buildings are themselves of heritage value, being representative of the qualities which prompted the designation of the Deptford Creekside Conservation Area. However, the ES concludes that the loss of one of the three buildings and the proposed changes to the others are not significant in EIA terms.

7.2.68 The most important historical asset which could be adversely affected (and the most significant potential adverse heritage effect identified in the ES) is the Victorian sewer. It is known where this is, and there are many other reasons why it should be protected from (for example) piling disturbance, so damage should not be expected.

7.2.69 Details of piling and archaeological investigation would be secured by condition.

Water Resource and Flood Risk

7.2.70 The ES states that the likely effects of the development on surface water, drainage and flood risk have been assessed by virtue of a site visit and review of various information sources, including those made available by the Environment Agency and Thames Water. A Flood Risk Assessment was undertaken that assessed the risk of rapid inundation of the site by flood water as a consequence of overtopping or breach of the River Thames flood defences.

7.2.71 The ES states that the CEMP would set out measures to ensure that surface water pollution would be prevented as far as practically possible during demolition and construction. For example liquids and solids would be stored in line with Environment Agency requirements and discharges to the drainage system would pass through settlement tanks and/or oil interceptors prior to release.

7.2.72 Deptford Creek is located immediately to adjacent to the site whilst the River Thames is located approximately 600m to the north of the site. The Environment Agency's indicative flood plane map shows that, without protection, the site lies in an area at potential risk from flooding. However, the site is protected from flooding by flood defences and the Thames Barrier.

7.2.73 The ES states that whilst the site is protected by flood defences there remains a very small risk of the defences being breached. However, all proposed residential units would be sited above the maximum flood depth and occupants would therefore remain safe in the worse-case event of a breach of the flood defences, nevertheless a Flood Response Plan would be developed for the site to reduce potential adverse effects to public safety. The plan would include measures to ensure that the commercial uses on the ground floor would be evacuated promptly on receipt of a severe flood warning.

7.2.74 The ES states that the inclusion of biodiverse roofs, permeable surfaces and storage tanks would ensure that surface water drainage would be restricted in line with Environment Agency guidance and would not affect the capacity of the existing sewers. In addition water efficient fixtures and fittings would be installed within the development and rainwater harvesting would be used to irrigate living roofs and soft landscaped areas.

7.2.75 The ES concludes that the effect of the proposed development on water demand, surface water, drainage and flood risk would be negligible.

7.2.76 It is considered that the effects of the development on water resources and flood risk have been properly assessed. Whereas almost all of the surface water from the Faircharm Trading Estate currently drains into a sewer beneath Creekside, the Environment Agency has requested that in future surface water drainage from 74% of the surface area be discharged into Deptford Creek instead, via a dedicated discharge point with a flap to prevent back-flooding during exceptionally high tide events.

- 7.2.77 The effect of this change on flood risk has been assessed, but no explicit assessment of the effect on the Creek's ecology has been carried out (though the water concerned should be relatively clean). Soakaways are not favoured because of the pre-existing contamination in the sub-surface layers. The consequences of any exceptional flooding would be dealt with in part by ensuring that no bedrooms are located on ground floors.
- 7.2.78 The use of brown roofs is proposed in order to slow rates of run-off, as is some rainwater harvesting to provide water for use in irrigation.
- 7.2.79 Conditions would be attached to control drainage which should include SUDs, surface water and to ensure that residential units meet Level 4 Code for Sustainable Homes which would help to reduce water consumption.

Ecology

- 7.2.80 The ES identifies and describes the ecological significance of statutory designated conservation sites within 2km of the site (Sue Godfrey Nature Park, Brookmill Road, Mudchute Farm, the River Thames, Deptford Creek, Ecology Centre, River Ravensbourne, St Pauls Churchyard, Crossfield Street Open Space, Twinkle Park). Notable species of flora and fauna are recorded.
- 7.2.81 The ES states that the ecological effects resulting from the proposed development comprised a review of data for species found on and within the vicinity of the site and a field survey to assess the habitats and species present. There are no nature conservation sites within the development site and the Phase 1 Habitat Survey found that habitats present on site were of no value for ecology.
- 7.2.82 The ES states that during demolition and construction, lighting, noise and dust would be controlled through the CEMP to minimise effects on any species present on site. This would result in an overall negligible to minor beneficial effect on ecology during the demolition and construction.
- 7.2.83 The ES states once completed, careful control of lighting, the addition of new habitats and landscape management would ensure minor beneficial effects on ecology at the development.
- 7.2.84 Chapter 3 of the original November 2012 ES (Table 3.1, page 7) identifies Deptford Creek as a potentially significant receptor for both the water environment and ecology. However, Chapter 14 of the original ES places limited emphasis on Deptford Creek on the grounds that it is outside the site, and that no work is proposed (e.g. to the river wall) which should affect it. At the request of LB Lewisham, more information on the Creek was provided in the March 2013 ES Addendum, though this concentrates mainly on the vegetation surrounding the Creek, and on sightings of birds that are not primarily associated with open water. It acknowledges the importance in the Creek mud of invertebrates, such as tubifex worms, on which other species feed, but does not consider the Creek's function as a nursery area for fish.
- 7.2.85 Nevertheless, LB Lewisham's own knowledge of the ecological value of Deptford Creek combined with the requirement to consider risks to the Creek further as part of the FWRA, means that any decision to grant permission for the redevelopment of the Faircharm Trading Estate, and any subsequent decision to approve the required CEMP, would not be taken in a state of ignorance. Consequently while a

more detailed ecological survey would have been beneficial the ecology has been properly assessed for the purpose of EIA.

- 7.2.86 As part of the assessment of the application a number of measures to enhance biodiversity and ecology onsite would be secured as discussed in relevant sections of this report.

Wind

- 7.2.87 The ES states that the potential effects of the development on local wind conditions were assessed with regard to pedestrian comfort and safety. The assessment used 3 dimensional modelling for the development which was subjected to simulated prevailing wind and weather conditions of the site in a wind tunnel. The cumulative schemes located within 360m radius of the development were included in the tunnel testing. Melaine Klein House and Binnie Court were included in the cumulative wind tunnel test; also Kent and Sun Wharfs were assessed using professional judgement.
- 7.2.88 The ES states that to allow for a worse-case assessment of the potential effects of the development to be undertaken the scenarios described above were tested without any existing or proposed landscaping. The assessment predicted wind conditions within the proposed development to be equivalent to, or better than, those required for the desired pedestrian activities for the site.
- 7.2.89 It is considered that the wind effects have been properly assessed. The proposed development includes one building which would be substantially taller than others in the area. Tall buildings in particular can create 'downwash' which affects conditions for pedestrians at ground level. A physical model was tested in a wind tunnel not least to inform the design process, and although some aspects of the assessment are not particularly clearly explained in Chapter 15 of the original November 2012 ES, it is clear that it did not raise any matters of concern as far as suitability for proposed uses are concerned.

Sunlight, Daylight and Overshadowing

- 7.2.90 The ES acknowledges that changes in the massing, layout and height of buildings can result in changes to the daylight and sunlight availability to buildings surrounding the site and can cause overshadowing of open space. The ES includes an assessment of the likely effect of the development on the amount of daylight and sunlight experienced by residential buildings close to the site and also the residential accommodation proposed within the development itself. The assessment also considered whether the new buildings would overshadow amenity spaces within and around the development.
- 7.2.91 The ES states that there would be no specific construction related effects on sunlight, daylight or overshadowing. As construction work proceeds the level of daylight and sunlight received by adjacent properties would decrease, while the effect of overshadowing would increase as the development progresses to completion, as would be expected.
- 7.2.92 An accurate 3 dimensional model was developed as part of the ES to identify the effect. The assessment was based on guidance published by the BRE.

- 7.2.93 The ES states that owing to the site currently consisting of relatively undeveloped, low rise industrial units, the urban nature of the surroundings and the scale of the development, there would be some unavoidable adverse effects on the amount of daylight and sunlight experienced at some of the surrounding residential properties. As per the BRE guidance, the resultant daylight and sunlight levels would be consistent with other inner city developments.
- 7.2.94 The ES assessment considers the level of daylight and sunlight within the proposed residential rooms of the new buildings, the results indicate that 85.48% of the rooms tested would be compliant with daylight levels suggested by the BRE.
- 7.2.95 The ES concludes that the level of permanent overshadowing within existing and proposed amenity spaces would be well within the level assessed as being acceptable by the BRE guidance.
- 7.2.96 It is considered that the ES has properly assessed the effects of the development on daylight, sunlight and overshadowing for the purposes of EIA. The main scope for adverse conditions (i.e. those where the BRE criteria cannot be fully met) arise within the proposed development rather than outside its boundaries (which would be of greater concern, because that might represent a scheme-driven deterioration in existing conditions affecting a third party). Prospective residents of Faircharm Creative Quarter would be able to take a view prior to moving in whether sunlight and daylight conditions meet their personal needs.
- 7.2.97 The third party property likely to be most directly and extensively affected is the Creekside Education Trust building, which would be shaded from a higher proportion of sunlight from the south than at present. As a non-residential building it is inherently less sensitive than a dwelling in the same location would have been, and the effects are assessed in the ES as negligible.
- 7.2.98 The ES draws attention to the fact that features such as balconies tend to cast shadows on windows below, thereby reducing the amount of direct sunlight that those windows receive. This effect already applies to the dwellings on the Crossfield Estate, to the west of Creekside, and would apply to most of the new dwellings.
- 7.2.99 Any light pollution effects from the proposed development would be typical of the area, and not significant.
- 7.2.100 For the purposes of EIA the assessment is acceptable. A full discussion of the impact of the development on neighbouring properties would be set out in relevant sections below.

Cumulative Effects

- 7.2.101 The ES states that two types of cumulative effects were assessed in relation to the development:
- The combination of individual effects arising from the development, for example the combination of noise, dust and visual effects; and
 - The effects resulting from the development in combination with other development projects in the surrounding area.

- 7.2.102 The ES States that during demolition and construction works of the development there would be some temporary combined effects, predominantly associated with townscape and visual effects, dust, noise and vibration and traffic. The CEMP would provide the mechanism by which temporary demolition and construction effects on surrounding receptors would be minimised.
- 7.2.103 The cumulative effects of the development in conjunction with the construction of a number of other reasonable foreseeable schemes, were generally found to be minimal. The 'cumulative schemes' considered were agreed with LBL and LBG, the nearest of which being the Kent and Sun Wharfs to the north of the site. Kent Wharf being vacant but Sun Wharf having an active business.
- 7.2.104 The ES states that adverse effects could arise in terms of demolition and construction waste, noise and air emissions from construction traffic, and noise and dust from additional demolition and construction activities in the vicinity of the cumulative scheme sites. However it is assumed that the other cumulative schemes considered within the assessment would also be subject of site specific CEMP, which would serve to minimise any such adverse cumulative effects.
- 7.2.105 The ES concludes that beneficial cumulative socio-economic effects would be possible through job creation during the demolition and construction phase, job creation on completion of the development and the other cumulative schemes (approximately 12,800 full time jobs) and increased housing provision (approximately 12,200 new homes). In addition if the cumulative schemes implement Sustainable Drainage System measures similar to the proposed development, the cumulative effects on surface water run off and flood risk have the potential to result in long term, minor beneficial effects.

Conclusion

- 7.2.2.106 In conclusion the Environmental Assessment complies with the EIA Regulations (2011) and it is not considered that the proposed development would cause unacceptable harm that cannot be sufficiently mitigated. Given the assumptions built into the ES, conditions should be imposed to secure the stated mitigation measures.

Principle of Development

- 7.3 The planning system plays a fundamental role in securing economic growth. At national level, the NPPF requires Local Planning Authorities to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth. The planning system should support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Local Planning Authorities should identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.
- 7.3.1 London plan policy 2.13 identifies Deptford Creek as an opportunity area where development proposals should seek to optimise residential and non residential development to sustain growth. Core Strategy Spatial Policy 2 reinforces this approach by designating Deptford Creekside as a Regeneration and Growth Area.

This area would support the creation of a more sustainable Borough by being the prime location for new development. The policy identifies Lower Creekside as an Local Employment Location (LEL) with the aim of protecting local employment opportunities particularly the concentration of creative industries.

- 7.3.2 London Plan Policy 4.4 Managing Industrial Land and Premises sets out the need to (a) identify and protect locally significant industrial sites where justified by evidence of demand and (d) accommodate demand for workspace for small and medium sized enterprises and for new and emerging industrial sectors. Core Strategy Policy 3 states that the Council would protect LELs for a range of uses within the B Use Class to support the functioning of the local economy. This approach is carried forward into Policy 9 of the Development Management Plan which is currently going through the consultation process.
- 7.3.3 The Site Allocations Development Plan Document identifies the Faircharm Estate as part of the Lower Creekside LEL. Consequently as a protected employment location the Planning Authority must assess whether a mixed use redevelopment of the Faircharm Site is an appropriate form of development which should be granted as an 'exception' to adopted planning policies.
- 7.3.4 The Council recognise the important role that Workspace play in this part of Creekside and have been in touch with Workspace over a number of years to try to retain and promote this site for employment purposes. While Workspace have sought re-designation of their site to mixed used, they have also supported the Charrette and have remained open to exploring ways to promote/enhance the area. Officers have always advised that the planning authority are reluctant to change the designation of the site but have continued to remain open to ongoing discussions with Workspace, taking account of Workspace role in London as an important provider of floorspace for SME business.
- 7.3.5 The Core Strategy allowed for re-designation of large tracts of industrial land to mixed use in order to manage competing demands in the Borough and to address housing need, but release of this site was not deemed to be appropriate on the basis that it was a thriving employment site. The Lewisham Employment Land Study (2008) identified Creekside as a well established industrial area. The study states *"Creekside appears to be emerging as a significant cluster for creative businesses. Faircharm anchors the area and is clearly the dominant use. The area has the potential to underpin local job creation, but this would be dependant upon new investment to replace the other parts of the DEA, most notably to the south, which would require refurbishment and/or redevelopment in the not too distant future. It would therefore be important to protect the area if this upgrading work is not to result in its loss to residential"*.
- 7.3.6 The Council has a long standing commitment to retaining employment use at Faircharm and recognises the importance of seeking to retain the small businesses that it houses. The site accommodates a numbers of small businesses, employing local people, many of whom live on the Crossfields Estate and in other locations in Deptford. The Council understands the importance of local connections in the Borough and wishes to support the growth of small and medium sized business in order to ensure that the creative hub that exists at present can be retained and built upon in the future. The existing uses within the Faircharm estate and surrounding buildings are an important part of the character

of the area. This was part of the rationale for adopting the Deptford Creekside Conservation Area.

- 7.3.7 It is in this context that Officers have continued to discuss options with Workspace to explore a way forward but it is important to recognise the limitation of the planning system, in that policy supports uses not users, so if a scheme provides the right amount and mix of uses, it would be difficult for the Council to resist.
- 7.3.8 It is also important to recognise that the Workspace model involves short periods of tenure, with high turnover. Occupiers move within the Workspace portfolio and sometimes out of the portfolio depending on how their businesses grow and contract. The Council has no control over the Workspace business model and this can cause conflict with policy objectives.
- 7.3.9 Officers have been engaged in extensive discussions with the applicant regarding redevelopment opportunities for the site. It has always been a priority for the Council to retain this site as an employment location for small and medium sized businesses with the intention of retaining and expanding the cluster of creative industries that exist at Creekside, both within the Faircharm Estate and neighbouring sites. In seeking to protect long term employment use it is important to recognise both the benefits and problems at the site.
- 7.3.10 The existing buildings at the Faircharm Estate, date from the 1950s and evidence shows that their age and condition are such that some costly works of reconfiguration and refurbishment would be required to sustain their long-term attraction as workspaces. At the present time there are large areas of the buildings that are not occupied due to poor layout and substandard conditions with deep floor plates and poor levels of natural light and ventilation. The site suffers from low levels of activity in the evenings, a poor street frontage and poor relationship with the Creek.
- 7.3.11 The buildings are currently separated in to 68 small businesses ranging from storage, IT and transport firms to creative art studios, music and film production and charitable organisations. The current level of employment is approximately 139 full time employees. The current buildings have an estimated Gross External Area of approximately 12,000 sqm However, the applicant states that the net useable space is circa 30% less due to lack of natural light. Whilst the existing buildings are structurally sound, roofs and windows are coming to the end of their natural life and the buildings perform poorly in sustainability terms. It is further stated that whilst existing occupiers benefit from low rental fees that reflect the standard of the accommodation, service charges are high due to ongoing maintenance requirements.
- 7.3.12 The applicant has submitted a survey of the existing buildings to assess their capability of meeting the needs of existing tenants. The survey looks at the condition of each building, its environmental performance, what works would be required to refurbish the existing buildings and the costs associated with this.
- 7.3.13 The applicant contends that continued use of the site as it exists today without significant investment is not sustainable.
- 7.3.14 A number of regeneration options have been developed and viability-tested as part of pre-planning application discussions about the feasibility of either retaining the site wholly in employment use or, alternatively, carrying out a mixed use

redevelopment incorporating other uses including residential. The viability exercise showed that it is not economically viable to refurbish and retain the existing buildings at current rent levels. In order for the existing buildings to become viable a rent increase of 500% would be required. This is not desirable or sustainable.

- 7.3.15 Other options ranging from partial to complete demolition and rebuild were tested with the conclusion that none of the options would be viable if a policy compliant scheme (in terms of 35% affordable housing) were sought. The viability exercise showed that a policy compliant scheme for complete demolition and rebuild was not a viable option but suggested that a blend of old and new development could be viable on this site, at the expense of the affordable housing.
- 7.3.16 The viability modelling undertaken is based on a series of assumptions at a particular point in time. The modelling is based on an assumption that development is supported by anticipated residential values. It is not the only way of doing it, but given Workspace own the site and are vastly experienced in the field, it would be difficult to contradict the findings. Furthermore, given the direction of Government policy, a counter argument would be very difficult to sustain on appeal. Officers therefore believe it would be better to work with Workspace to explore options than to adopt a 'do-nothing' approach which could result in the site becoming vacant.
- 7.3.17 The Workspace approach has been tested and challenged and the conclusions of their approach are fair and reasonable. Continued discussions with the applicant took place on the basis of the viability exercise undertaken at early stages of the pre application process.
- 7.3.18 Officers consider a robust case has been demonstrated that redevelopment of the site is necessary and appropriate to ensure longevity of employment use and enabling residential development is necessary in order to make redevelopment viable at this time. Consequently it is considered that the principle of the proposal is acceptable as an exception to Core Strategy Policy 3, Core Strategy Spatial Policy 2 and the Site Allocations Development Plan Document.
- 7.3.19 The viability of the current proposal has been tested by way of a submission of a Viability Assessment which has been assessed by the Councils Consultant. The outcome of that assessment and its impact on affordable housing provision is discussed in later sections of this report.
- 7.3.20 Whilst Officers accept that continued use of the site as existing cannot be sustained and therefore it is necessary and reasonable to consider redevelopment opportunities, they have always expressed serious reservations about the displacement of existing businesses within Faircharm and the impact of this upon those existing business and surrounding facilities. Retention of some of the existing buildings was considered essential in the interests of good place making and retaining the industrial character and feel of the site as part of the redevelopment.
- 7.3.21 In order to address these concerns (and in response to the conservation area designation) the redevelopment proposes retention and refurbishment of Buildings A and C with new build development to the rear of the site. Officers welcome this approach in principle and strongly support retention and refurbishment of the existing buildings to bring them up to a modern standard that can maximise

employment use. However, it is important to recognise that this approach does result in a significant reduction in the amount of employment floorspace that can be accommodated within the existing buildings and has financial implications on the build cost of the redevelopment. Therefore a balance must be struck between the benefits of retaining the existing buildings and enhancing the quality of employment space within those buildings, against the consequential overall reduction in the amount of employment floorspace to be provided.

- 7.3.22 The applicant has demonstrated that the level of residential development proposed is the minimum necessary to enable redevelopment of the site and it is considered that the amount of residential development and how this is positioned within the site is appropriate in urban design terms. With this in mind and taking account of the design rationale for the layout, height and massing of the new development it is not possible to provide a higher quantum of employment space as part of the redevelopment whilst accommodating the required enabling residential units. Any further increase in employment floorspace would generate a need for additional residential development in order to make the proposal viable and this would have unacceptable urban design implications.
- 7.3.23 Consequently the proposed redevelopment would result in a significant reduction in employment floorspace (from 9,500 NIA sqm (7,350 NIA sqm naturally lit space) to 3,373 NIA sqm. Existing GEA is circa 12,000 sqm, proposed GEA would be 5,089 sqm). However, on balance the benefit of providing higher quality employment floorspace that can be sustained in the long term is considered to outweigh the loss of employment floorspace overall, provided the redevelopment remains genuinely employment led with high quality commercial space being provided and impact on existing businesses being properly mitigated.
- 7.3.24 Officers have been engaged in extensive discussions with the applicant regarding the needs of small and medium sized businesses. The layout of the site is based on these discussions. It is intended that commercial uses occupy a large proportion of the site at ground floor level not just the front section. The commercial spaces have been designed to be flexible in terms of size. The plans submitted show a range in unit sizes but all units can be extended/contracted to suit specific requirements through the use of easy to erect/demolish internal walls. The units would be fitted with up-to-date services and broadband. The refurbished spaces have been designed to retain the gritty/industrial character that exists at present. The refurbished units have a robust finish to them as opposed to polished office style refurb to reflect the industrial character of the development but would benefit from natural light, independent entrances and would be more comfortable in terms of temperature control. Courtyards within Buildings A and C would provide invaluable communal space for networking and exhibitions.
- 7.3.25 The new buildings at the rear of the site have well proportioned fit for purpose commercial units on the ground floor that benefit from double height, accessible and attractive space which would offer high quality workspaces with the ability to utilise external space for exhibitions.
- 7.3.26 It is considered that the standard of commercial space to be provided would be high quality responding to the needs of a range of light industrial uses. The amount of commercial space on the site is sufficient to ensure that the site retains its character and feel as a genuine mixed use locality with a strong emphasis upon a place of work as opposed to a residential site with a tokenistic commercial

element. Whilst representing a reduction in the amount of floorspace the enhanced floorspace would be capable of supporting circa 330 full time employees which is a net increase of nearly 200 jobs. This would be a substantial contribution to the employment market in the Borough.

- 7.3.27 A large proportion of the commercial floorspace would be open B1 Use Class. This Use Class allows for offices, research and development of products and process and light industry that can take place in residential areas without giving rise to unacceptable pollution. A number of third party objections have been received regarding the loss of the B2 Use Class (general industry) on the site. Whilst this site was historically used for general industry the nature of industrial sites has changed significantly in recent years and there is less demand for general industry on a national and local scale. It is appropriate that employment sites adapt to respond to economic need. The Councils evidence base identifies a need for B1 commercial floorspace. There is a misconception that B1 only allows for office development, this is incorrect as B1 allows for a range of light industrial businesses which encompasses many creative industries. The applicant has confirmed that the majority of existing businesses within Faircharm operate within a B1 Use Class designation and furthermore most of the premises within Workspace portfolio operate within a B1 Use Class, this includes a wide variety of businesses uses including a varied creative sector.
- 7.3.28 Notwithstanding the above, in response to the concerns raised the applicant has amended the scheme to incorporate an element of B2 Use should it be required. The plans identify an area of 397sqm (GEA) within Building A that can be used for B2 purposes without requiring further alteration to the building or other mitigation measures.
- 7.3.29 In order to address Officer concerns regarding the displacement of existing businesses and the short/medium impact on employment in the Borough while redevelopment is taking place, the applicant has put forward a comprehensive package of mitigation measures that can be secured through the s106 agreement. This includes undertaking a referencing survey to understand businesses accommodation needs for existing tenants, developing a property database identifying relocation opportunities for tenants either in other Workspace premises or in the local area and providing a Business Continuity Fund to support tenants with temporary or permanent relocation costs (up to £6000 for each business).
- 7.3.30 There is also a commitment to relocating Creekside Artists within alternative Workspace premises on a favourable rate and subsidising the return of Creekside Artists and London Youth Support Trust within the new development for an agreed period of time.
- 7.3.31 The London Youth Support Trust (LYST) is dedicated to supporting young disadvantaged entrepreneurs who aspire to set up a business. LYST provide clients with subsidised business space for a three year period, together with intensive business advice and personal support. LYST has business incubation centres located in Haringey, Deptford, Lambeth, Southwark and Hackney. LYST assist previously unemployed or under-employed clients helping them to test their business ideas, write their business plans and secure funding. Clients have their own workshop space and are provided with timely, relevant and on-site advice provided by LYST Centre Managers and volunteers.

- 7.3.32 LYST play an important role in creating employment opportunities in the Borough. The Council wish to support this type of organisation and to take all practical measures to retain organisations such as this in the Borough, and therefore it is appropriate to secure measures that would mitigate the impact of the development in this respect. Workspace has confirmed that they do not have alternative premises within Lewisham that LYST could occupy. LYST would like to remain in Lewisham Borough. The Council are committed to assisting LYST in finding alternative premises within the Borough whilst redevelopment of Faircharm is taking place and then securing a package that would enable LYST to return to the completed development should they wish to do so.
- 7.3.33 Creekside Artists is an artist-led co-operative established in 2000 to provide affordable studio space for artists & designers. They occupy space within the Faircharm site which is divided into 12 units, each housing 1 or 2 artists. The set-up is open plan to encourage artist interaction and to foster an informal & sociably creative atmosphere. Creekside Artists promote artists to the public through thrice-yearly Open Studio weekends & exhibitions. These events provide valuable exposure & education for both artist & public alike. Such events benefit Creekside Artists and other small and medium sized businesses in the area.
- 7.3.34 It is considered that Creekside Artists make a valuable contribution to the creative industry sector. Organisations such as this help the creative industry to grow and play an important role in developing the creative hub that exists within Creekside. The temporary relocation of Creekside Artists in alternative Workspace accommodation and an attractive package to encourage them to return to the completed development is considered to be an important part of the current proposal.
- 7.3.35 In addition to the above a contribution of £100,000 to be paid to the Council would be secured through the s106. This sum would be used to cover a variety of projects coordinated by Lewisham Council. Identified projects could include:
- Assisting tenants to relocate in the Borough, focusing in, Deptford, New Cross and other parts in the north of the Borough and on industrial sites or buildings which could accommodate light industrial and creative businesses.
 - Short listing properties matching requirements of businesses in Faircharm, prioritising larger premises which could accommodate a cluster of businesses.
 - Developing Opportunities for Meanwhile use. Identifying space and refurbishment and/or temporary fit-out.
 - Offering relocation advice and advocacy support service for existing tenants (which is independent from Workspace). This would provide a one to one advice and advocacy support from a business advisor. The support would help businesses in Faircharm to establish long term needs, plan for the future and the effects of moving, support with finding premises in Lewisham (or temporary premises outside) and undertaking negotiation with landlords, providing advice on leases and legal advice
 - Supporting Growth in Digital Media Starts Ups and Micro Businesses. A Survey of digital media business in Lewisham in December 2011 identified

over 640 of these businesses, nearly all were micro businesses with one or two employees. Research into these businesses in other areas (such as Tech City) has shown that these businesses benefit greatly from clustering although this is underdeveloped in the borough. Faircharm would be a good location for developing such a cluster. During the two years when Faircharm would be empty a programme of support would be developed to help develop a cluster of these businesses in Deptford which would provide a pipe line of new digital media businesses which could move into the new Faircharm. The support would include local business networking and support for starting up, growth and innovation.

- Maintaining and developing the profile of Creekside as a centre for creative and cultural activity. During the two years when the Faircharm site is empty, the neighbouring businesses, venues and public events have expressed concern that the public audience and spend would be reduced. A programme of profile building for the creative and cultural cluster would be developed to help reduce the fragility of the cluster's ecosystem and supply chains around Faircharm and also enhance the profile of the area so the new development would attract a high level of interest when it launches.

7.3.36 A contribution of £50,454 would also be paid to the Council towards employment and training initiatives in the Borough. The s106 would also include an obligation to use local labour during construction.

7.3.37 The mitigation measures set out above are considered to be necessary to make the development acceptable and fairly and reasonably related to the scale of the development proposed. The measures would adequately address the short and medium term harm caused to existing businesses and employment in the Borough whilst redevelopment is taking place. In the long term it is considered that the redevelopment of the site would make a positive contribution to sustainable employment space in this area contributing to the longevity of Creekside as a hub for creative industries.

7.3.38 The applicant has explored the possibility of phasing the construction programme so that some businesses could be retained on site during redevelopment. However, this would give rise to a significantly longer period of construction which would have adverse impacts on neighbouring residents and is also difficult to achieve due to the noise and disruption that existing businesses would face if they stayed on site. An extended construction programme would mean that businesses wishing to temporarily relocate and return to the site once complete would have to sustain their temporary arrangements for a longer period. Finally the applicant has not been able to secure the necessary insurance cover required to facilitate this. Consequently phasing is not proposed and the development would be constructed as one phase. However, the applicant has confirmed that Building A would be refurbished and made available for occupation prior to any of the residential units being occupied. This would be controlled via the s106 agreement.

7.3.39 Third party concerns have been raised regarding the compatibility of commercial and residential uses and whether onerous restrictions that might be imposed on the commercial uses to protect residential amenity would inhibit successful operation of the businesses that occupy the site in the future. As this is a mixed use development where the primary consideration is to ensure that a significant

amount of fully functioning commercial space is provided it is not considered necessary to attach stringent controls on the operation of the commercial uses.

- 7.3.40 Future occupiers of the residential development cannot expect the same type of amenity that would be afforded in a residential development in a suburban area. A degree of noise and disturbance is to be anticipated and evening activity would be welcome in the interests of good place making. Consequently it is not intended to attach conditions to control hours of operation or deliveries once the development is complete. The residential units have been designed to reflect their surroundings, appropriate mitigation has been incorporated into the design to address noise from surrounding commercial use and the DLR. Design and plant noise conditions to enhance the protection of residential units would be attached to the permission.
- 7.3.41 Overall the proposal is considered to represent a sustainable development option that would make a valuable contribution to economic growth in the Borough in accordance with the objectives of the NPPF. As such approval is recommended contrary to Core Strategy Policy 3: Local Employment Locations, Spatial Policy 2: Regeneration and Growth Areas and the Site Allocations DPD.

Demolition in the Conservation Area

- 7.4 The Planning (Listed Building and Conservation Areas) Act 1990 confirms that local authorities should pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. Conservation Area Consent is required for the partial demolition of Buildings A and C to create the courtyards and complete demolition of Building B and the rear section of Building A (known as Building D) to facilitate the redevelopment of this site.
- 7.4.1 For new development within conservation areas, the NPPF advises that, local planning authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 7.4.2 The proposal involves the introduction of residential development to a considerable scale and density that is uncharacteristic and historically without precedent within the conservation area. It involves the demolition of one building that positively contributes to the present character and the change of use and the nature of the proposed scale and density of the new development can be said to affect the integrity of the industrial quarter.
- 7.4.3 There are elements within the scheme that serve to sustain the area's industrial character, notably in the sympathetic and in places innovative approach that has been taken towards the remodelling and refurbishment of the retained industrial buildings. On balance however, while there are elements of enhancement, the proposal cannot be considered 'to better reveal the significance' of this heritage asset due to the harm caused by the introduction of high-density residential element.
- 7.4.4 There are a number of aspects of the application that can be considered to cause a degree of harm to the significance of the Deptford Creekside Conservation Area. The demolition of the rear part of Building A (Building D) to create the courtyard and enable the erection of Building 02 would have an adverse impact in

conservation terms. This part of Building A/D has been identified in the Deptford Creekside Conservation Area appraisal as a building making a positive contribution to the character and appearance of the conservation area.

- 7.4.5 Other issues are the proposed density of the new build elements, the reduction in commercial floorspace and the resulting loss albeit temporary of (creative) industries on site. Furthermore the extent of soft landscaping proposed is not sympathetic to the historic industrial landscape of the area. These elements have been discussed elsewhere in this report and for the reasons set out in relevant sections of the report the benefits of the proposal are considered to outweigh the harm caused to the conservation area.
- 7.4.6 With regard to the demolition of Building D (rear of Building A) the NPPF advises that, not all elements of a Conservation Area would necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.
- 7.4.7 Building D is a later extension to Building A. Within the wider context of the conservation area it is considered that its demolition amounts to less than substantial harm to the character and appearance to the conservation area. In this case the NPPF advises that, where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 7.4.8 The PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide which is still in place and supplementing the NPPF advises that, it is important that any use is viable, not just for the owner but also for the future conservation of the asset. Viable uses would fund future maintenance. It is obviously desirable to avoid successive harmful changes carried out in the interests of successive speculative and failed uses. If there are a range of alternative ways in which an asset could viably be used, the optimum use is the one that causes the least harm to the significance of the asset, not just through necessary initial changes but also as a result of subsequent wear and tear and likely future changes. The optimum viable use is not necessarily the most profitable one. It might be the original use, but that may no longer be economically viable (...), and...harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, provided that the harm is minimised.
- 7.4.9 There are a number of public benefits deriving from the proposal, notably the refurbishment, alteration and upgrading of Building A and C which would ensure the continued long-term future and use by the creative industries on this site, the addition of an attractive pavilion facing Creekside, the environmental improvements to the site generally and open access for the public to the Creek's edge. Much thought has been given to the design and choice of materials to achieve a high quality development that takes references from its historic context and with time has the potential to add to the local distinctiveness of the area as much as the surviving industrial buildings and structures do.

- 7.4.10 These benefits must be weighed against the harm caused by the loss of Building D and the proposed change of use and density of the new build. Officers are satisfied that the proposed density and scale are in terms of financial viability necessary and justified to make this a viable scheme, and are the minimum necessary to achieve the conservation and regeneration objectives for the site and the area. The proposal demonstrates a high quality design that would make a valuable contribution in place making terms as well as securing long term employment use on the site and retention of the two most significant existing buildings. Consequently it is considered that the harm caused by the proposal is outweighed by the public benefits of the development.
- 7.4.11 In the interest of the repair, refurbishment and long-term industrial use of the retained buildings and structures it is desirable from the conservation point of view that the employment area designation is handled flexibly so as to allow the residential elements to enable the future conservation of the industrial part and features of the site.
- 7.4.12 The benefits deriving from the scheme should include the full repair and a maintenance plan for any historic features surviving on site which include the redundant water tower, the historic brick boundary wall to the north (Creekside Centre) including the surviving footing of the tanks located here, and the brick section of the Creek wall. Conditions would be attached in order to ensure the long-term survival of these features.
- 7.4.13 In respect of demolition of Building B, the NPPF advises that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal, and ...not all elements of a (...) Conservation Area would necessarily contribute to its significance.
- 7.4.14 The building is described in the conservation area appraisal as *“Building B occupies the north-eastern part of the site and was the last building to be added to the site in the late 1950s or early 60s. By virtue of its location and scale, it exerts a great presence towards the Creek. Built in the modern functional style of its period, it is in massing and height a notable deviation from the other industrial buildings in the area. Although it reflects the traditional palette of materials, due to its large footprint and boxy appearance the building lacks the townscape interest created by the more traditional conjoined warehouses on the site and elsewhere in the area”*.
- 7.4.15 On the townscape appraisal map Building B is described as a ‘neutral’ building meaning that it is not considered to be of any architectural or historic merit adding to the significance of the area. It has made a contribution to the area though by its use, providing workspace for the creative industry. However, as long as these uses can be retained and provided elsewhere as much as possible there are from the conservation point no objections to the replacement of the building in principle.
- 7.4.16 In conclusion from a conservation perspective the proposed demolition is considered to be justified and the benefits of the proposal outweigh the harm to the conservation area.

- 7.4.17 The impact of the proposal on the conservation area from a design perspective is discussed in paragraphs 7.6 below.

Proposed Residential Development

- 7.5 At national level, the NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. Local Planning Authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. As discussed in paragraphs 7.4 it is considered that the case has been made that this site is suitable for a mixed use redevelopment and therefore it is necessary to assess the acceptability of the residential element of the proposal.
- 7.5.1 At regional level, the 2011 London Plan seeks mixed and balanced communities (Policy 3.9). Communities should be mixed and balanced by tenure and household income, supported by effective and attractive design, adequate infrastructure and an enhanced environment. Policy 3.11 of the plan confirms that Boroughs should maximise affordable housing provision. Though the Plan does not set percentage targets for provision at Borough Level, it sets a strategic target of 13,200 more affordable homes per year across London as a whole and confirms that Boroughs should set their own targets according to the Strategy of the London Plan. The policy also refers to a strong and diverse intermediate sector, where 60% of provision should be for social rent and 40% should be for intermediate rent or sale and priority should be accorded to the provision of affordable family housing.
- 7.5.2 Spatial Policy 2 of the 2011 Core Strategy requires that the Deptford, Deptford Creekside, New Cross/New Cross Gate area accommodates up to 2,300 additional new homes by 2016 and a further additional 8,325 new homes by 2026. Though the Core Strategy envisages that the majority would be met by the Strategic Sites, this application would make a significant contribution to housing supply in the area.
- 7.5.3 Core Strategy Policy 1 confirms that the maximum level of affordable housing would be sought by the Council, with a strategic target of 50%, as a starting point for negotiations and subject to an assessment of viability. The policy also seeks provision at 70% social rented and 30% intermediate housing and family housing (three+ bedrooms) in development of more than 10 units and where existing areas have a high concentration of social rented housing, different proportions of affordable housing would be sought. Different proportions are supported by the Lewisham Housing Market Assessment 2007-8 (HMA), published in December 2009 which states (paragraph 37) that affordable housing provision in Lewisham should comprise 85% social rented housing, and 15% intermediate housing, in order to meet the identified need.
- 7.5.4 The HMA states (at paragraph 35) that a net 6,777 dwellings should be provided over the current 5-year period to meet current identified need. This is equivalent to the provision of 1,345 dwellings per annum. Table 3A.1 of the London Plan sets out a target of 11,050 additional homes to be built in Lewisham in the 10 years from 2011 - 2021, which is reflected in a monitoring target of 1,105 additional homes per year.

As part of the overall need for housing in Lewisham, there is a specific need for affordable housing. The HMA states (paragraph 36) that over 80% of all new housing built would need to be affordable in order to meet identified need.

7.5.5 Core Strategy Policy 1 indicates that where a site falls within an area which has existing high concentrations of social rented housing, the Council would seek an 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.

7.5.6 In these circumstances the provision of housing is a relevant consideration in the determination of this application, as is the on-going need for affordable housing in the Borough. However, as discussed in paragraphs 7.4 above the Councils priority for the site is the retention of affordable employment floorspace with a focus upon long terms benefits for small and medium sized businesses in the creative sector together with a Business Continuity Strategy to mitigate the impact of the redevelopment in the short and medium term.

a) Size and Tenure of Residential Accommodation

7.5.7 The proposed development would provide 148 residential units including 21 affordable units (30% intermediate and 70% affordable rent) The unit sizes and tenure breakdown of the proposed development are summarised in the table below.

Table 1: Residential Tenure and Size Mix*

	1 Bed	2 Bed	3 Bed	4 Bed +	Total
Private	56 (5)	55 (6)	16 (2)	0	127
Social Rent	0	0	0	0	0
Affordable Rent/Shared Ownership	7 (1)	13 (1)	1 (0)	0	21
Total	63	68	17	0	148 (15)

*Wheelchair accessible units shown in ()

7.5.8 Based on this mix, the development would comprise 14% affordable units (by habitable room and unit) of which 70% would be affordable rent and 30% intermediate. The remaining 86% would be private units (85% by habitable room).

7.5.9 The percentage of affordable housing to be provided falls significantly short of the affordable housing figure referred to in Core Strategy Policy 1 and the extent to which it meets the strategic target of 13,200 units per year across London in Policy 3.11 of the London Plan is limited. However, this site is a designated employment site and therefore any residential development should be treated as “windfall” development. In policy terms, officers consider the priority to be re-provision of appropriate employment floorspace and in conservation terms to secure appropriate retention of the two buildings of significance. Both of these issues add significant costs to the redevelopment and therefore the level of affordable housing provision that can be secured at this time is limited.

- 7.5.10 The Applicant has submitted a confidential financial appraisal for the scheme that 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 in section 9 of this report. However, in summary, the financial appraisal demonstrates that, when taken with other policy requirements and the conservation and regeneration benefits of the scheme, such as retention and refurbishment of the existing buildings and provision of a extensive Business Continuity Strategy, the proposed development provides the maximum viable amount of affordable housing at this time.
- 7.5.11 It is also important to consider the sizeable package of s106 obligations secured which includes a significant contribution towards transport and public realm enhancements in the vicinity of the site. Such mitigation has an impact on viability.
- 7.5.12 While it is accepted by Officers that the provision of a larger proportion of affordable housing is not possible at this time, given the shortfall in affordable housing provision relative to the levels set out in planning policies, it is appropriate that the level of provision be kept under review. To this end a mechanism would be incorporated as part of the Section 106 to consider securing a financial contribution towards affordable housing provision off-site, should values increase to a level where this would be financially viable.
- 7.5.13 It is also relevant to note that the provision of the 21 affordable units does not meet the 70% social rented / 30% intermediate split for housing set out in Core Strategy and the 60/40% split in London Plan Policy 3.11. However, in this case a balance has been struck between the mix of uses on the site, affordable housing size and tenure mix. For the reasons set out previously and in more detail in paragraphs 9, the proposals have been shown to include the maximum amount of affordable housing viable in a particular tenure and it is therefore recommended that this tenure mix is accepted.
- 7.5.14 The proposed size mix includes 17 units (11%) as family-sized accommodation (3 + bed), 68 units (46%) as 2-bed and 63 (43%) as 1-bed units. Though the mix includes some family sized units in accordance with Core Strategy Policy 1 a larger proportion of 2 bed units in this location is considered appropriate given the mixed use of the site with significant emphasis on employment provision and taking account of the location of the site in a predominantly commercial setting. Furthermore it is important to recognise that all units within the development meet GLA minimum sizes and the majority of units offer extremely generous accommodation far exceeding the GLA minimum standards.

b) Standard of Residential Accommodation

- 7.5.15 The Councils Adopted Residential Standards SPD (2006) sets out criteria for new residential units but this document is largely superseded by Core Strategy and London Plan requirements and the recently adopted Mayors Housing SPG. The Housing SPG sets out guidance to supplement London Plan policies, Part 2 of the SPG deals with the quality of residential accommodation setting out baseline and good practice standards for dwelling size, room layouts and circulation space, storage facilities, floor to ceiling heights, outlook, daylight and sunlight, external amenity space including cycle storage facilities as well as core and access arrangements.

- 7.5.16 Table 3.3 of the London Plan and Standard 4.1.1 of the SPG sets out minimum space standards for new development. The standards require the largest 1-bed to be a minimum 50 sqm, largest 2-bed 70 sqm and largest 3-bed 95 sqm. The Applicant has shown that all of the units comfortably meet the minimum sizes and the majority of the units exceed the minimum unit size. From a total of 148 units just 4 of these units (all 1-beds) fall just short of the minimum bedroom space standard requirements. The bedrooms in these 4 units are 10m² (1m² short) although the overall flat area at 52m² is still quite generous for a 1-bed. These are the worst-case scenarios – most other units far-exceed the baseline and best practice standards. The internal layout of the units allow for a high standard of amenity.
- 7.5.17 The majority of the units are dual aspect including all of the family sized units and none of the single aspect units are north facing. All habitable rooms receive good levels of natural light, ventilation and outlook. In order to address concerns raised by Officers with regard to the amount of daylight that would be received in some of the units the applicant has amended the design to provide better internal layouts and creation of large studio style one bed units. There are still a small percentage of rooms that don't meet the BRE guidance for daylight (15%) but overall this is considered to be acceptable given the quality of the accommodation being provided in terms of internal layout, space standards and private amenity space.
- 7.5.18 The layout of the development is such that habitable rooms are provided with an adequate level of privacy and units have been stacked so as to reduce noise pollution. There are no more than 8 units on each floor with two lifts provided for each floor.
- 7.5.19 Standard 4.10.1 of the Housing SPG sets out the baseline requirements for private open space. The standard requires a minimum of 5sqm to be provided for 1-2 person dwellings and an extra 1sqm for each additional occupant. The minimum depth for all external space is 1500mm. All units within this development would have private amenity space in the form of balconies which meet the aforementioned standard. A number of the units have multiple balconies.
- 7.5.20 All units benefit from cycle, refuse and recycling storage facilities that are secure, covered and well located in relation to the dwelling.
- 7.5.21 As well as private amenity space and facilities the site provides high quality communal space and there are a range of public open space facilities within walking distance of the site as discussed in paragraphs 7.7 below.
- 7.5.22 It is recognised that the proposed residential units would be located in close proximity to commercial uses within the Faircham site and on adjacent sites. Given the mixed use location future occupiers could not expect to enjoy the same level of amenity that you would experience in a predominantly residential location. It is to be anticipated by anyone choosing to live within this mixed use, commercially led development that there would be commercial activity taking place day and night and a certain level of noise associated with the commercial uses must be accepted. As stated above it is not considered to be necessary or appropriate in this mixed use location to control the hours of operation for the commercial uses but the design and layout of the proposal is such that future occupiers would benefit from good levels of privacy and adequate level of protection from excessive noise.

- 7.5.23** The Applicant has assessed the extent to which the site is suitable for residential development, taking account of the DLR, surrounding commercial uses and the proposed commercial uses. The report concludes that future occupiers would not suffer from excessive noise pollution. The Councils Environmental Health Officer (noise) supports the Applicant's approach and conditions can be included on a planning permission to control the level of noise within the units, the noise from external plant and transmitted noise
- 7.5.24 The properties have been designed with appropriate glazing to protect future residents from excessive noise pollution generated by adjacent commercial uses and the DLR.
- 7.5.25 Overall future occupiers of both the private and affordable units would benefit from high quality accommodation with a good standard of amenity.
- 7.5.26 Retained Policy HSG 5 of the UDP states that the Council would only permit new residential development that provides physical accessibility for all members of the community including people with disabilities. Where appropriate, the Council would seek the provision of new homes designed, or capable of adaptation, to housing for long term needs. London Plan Policy 3.8 and Core Strategy Policy 1 require all new homes to be built to Joseph Rowntree Foundation's Lifetime Homes Standards and 10% of all dwellings to be wheelchair accessible. The Councils Planning Obligations SPD specifically refers to the SELHP wheelchair accessibility standard.
- 7.5.27 The practical application of the Lifetime Homes Standard is to apply the criteria where relevant as many sites would not lend themselves to all of the criteria and some flexibility in their application is required. The accommodation schedule confirms that all residential units have been designed to Lifetime Homes standards, where the 16 criteria of the standard are applicable. In this case, criteria 1a (on plot car parking) is not applicable to any of the units and save for the maisonettes criteria 9 (potential for entrance level bedspace), 12a (potential for stair lift installation) and 12b (potential for through the floor lift) would not apply. There are a small number of units which only have access to one side and the foot or two sides (not the foot) of the bed for bed making space although the rooms still offer a good level of accessibility. It is clear from the application submission that the general approach to Lifetime Homes is acceptable and a condition is capable of inclusion on a planning permission to ensure the standard is met as far as practically possible.
- 7.5.28 In accordance with policy requirements the development would include 15 units (10%) as wheelchair accessible/adaptable in full compliance with SELHP 2012 standards. Two of the units would be provided within the affordable accommodation, the remaining 13 units would be private dwellings. Plans have been submitted to demonstrate full compliance with SELHP standards. A disabled car parking space has also been identified for each unit. The provision of the units (including marketing details for the private units) would be secured through the s106 agreement.

Urban Design

- 7.6 Urban design is a key consideration in the planning process. The NPPF makes it clear that national government place great importance on the design of the built

environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

- 7.6.1 The NPPF requires Local Planning Authorities to undertake a design critique of planning proposals to ensure that developments would function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Proposals must establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Developments are required to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. New development must create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.
- 7.6.2 Access to high quality open space and public realm is an important urban design consideration that plays a fundamental role in enhancing the health and well being of communities.
- 7.6.3 London Plan and Core Strategy design policies further reinforce the principles of the NPPF setting out a clear rationale for high quality urban design.
- 7.6.4 The proposal has gone through an extensive pre-application process which included several design workshops and discussion at Design Review Panel to embed quality in the scheme and to ensure that its delivered. Through this process the Applicants Design Team have addressed many of the original concerns for the scheme and thus the application is largely viewed favourably in both urban design and architectural terms. The application has been developed in liaison with the Councils Urban Design and Conservation Officers. The Councils Design Team are now largely satisfied with the proposal subject to detailed elements being secured by the conditions recommended in this report.
- 7.6.5 The layout, massing, height, scale and architectural appearance of the proposal has been described in section 4 of this report.

Layout

- 7.6.6 The general approach to the site layout is appreciated. The retention of the more architecturally significant buildings along Creekside is welcomed. Likewise, the alterations to these buildings, such as the introduction of courtyards and the new café, is felt to provide further design interest.
- 7.6.7 The location of the new build elements is understood in regards to desired routes and appears to make the best use of a site heavily restricted by view corridors and environmental river access conditions. In this respect, locating the tallest element to the south as much as possible to reduce the impact on St Pauls Cathedral and

St Pauls Church makes sense – however in this location it has the potential to create overshadowing issues for the other buildings on site.

- 7.6.8 The open access to the river is greatly appreciated and felt to be a positive contribution to the surrounding area. This route needs to remain as a public benefit and thus site accessibility should be enshrined in the planning permission and secured by way of a Public Access Management Plan via the s106 agreement.
- 7.6.9 The proposed site layout would significantly enhance legibility and permeability through the site and would introduce an active street frontage to this part of Creekside. The internal shared street, courtyards and spaces seek to create an interesting and varied landscape to encourage pedestrians to explore spaces within the site and the Creek edge.
- 7.6.10 The retention of Buildings A and C at the front of the site reinforces the character and feel of Faircharm as an employment led location, the existing buildings have a strong presence in the street and play an important role in defining the streetscape of Creekside. The new ground floor commercial units have been located in three of the new buildings in order to ensure a genuine mixed use and character throughout the site, where residents and business tenants would interact and share space, as opposed to creating a clear separation within the site between commercial use at the front and residential use to the rear. The mixed use and character would be further reinforced by members of the public having access to the landscaped space adjacent to the Creek.
- 7.6.11 In order to provide an appropriate level of privacy and some defensible space to the ground floor residential units these units have been positioned within Buildings 02 and 03.
- 7.6.12 The units in Building 02 would face onto the ‘residential street’ used for vehicles exiting the site. This route is wide enough to accommodate vehicles leaving the site on a one-way system as well as parallel parking on both sides of the street. It is not intended that this route would act as a busy pedestrian route as it doesn’t lead to a destination for the public. Landscaping would be used to soften the appearance of this street and to provide defensible space to the dwellings. The units have been designed with recessed entrances and small front terraces which adds a further layer of protection.
- 7.6.13 The units in Building 03 that would face onto the ‘residential street’ would experience the same level of privacy as those in Building 02. The maisonette in the northeast corner of the block would face onto the northeast corner of the site which would be landscaped but would not be a public space so this unit would be afforded a good level of privacy. There are two units that would be sited on the southern side of the block facing onto the shared communal/public space in fairly close proximity to the commercial units. However, the angle of the building is such that the residential units are set back from the commercial studios and it is considered that subject to detailed landscaping sufficient defensible space can be achieved.
- 7.6.14 Overall the amount and layout of commercial and residential space within the site is considered to be appropriate in place making terms.

- 7.6.15 A gated community would not be acceptable to the area and instead the security strategy should continue to focus on the layout, which maximises active surveillance. Site security is discussed in more detail below.
- 7.6.16 The amount of parking incorporated in the layout is acceptable from an urban design perspective. However, it is felt to be the most that the site can positively contain.

Height and Mass

- 7.6.17 The new buildings are larger than those of the surrounding area – in both height and massing terms, including a 12 storey block that meets the definition of a taller buildings in an area that is not identified as a tall building location in the Councils Tall Building Guidance.
- 7.6.18 In close range views the proposed massing is largely deemed acceptable in urban design terms. The lower new buildings (01, 02 and 03) would not dominate the existing buildings when viewed from Creekside and there are ample sized areas of open space between the buildings on site. However from long range views, including protected vistas, these lower buildings can be said to negatively impact upon the views to St Pauls Church, Deptford.
- 7.6.19 The view from Blackheath Point shows St. Paul's Church, Deptford within a setting of mature trees framed by the tops of the Crossfield Estate buildings. Due to the consistent scale of the Crossfield Estate (5-storeys) St. Paul's Church is clearly the defining landmark in the area. Historic maps and aerial views show that historically, its landmark status was never challenged and large scale buildings, such as the mills on the southern end of the Creek or the Deptford Power Station at the Creek's mouth, were located in some distance.
- 7.6.20 The impact of the proposed development is shown on page 15 of the Townscape & Visual Impact Assessment (Vol. 3 of ES) and can be described as significant. Building 3 creates a solid 'wall' in front of the church which, albeit not being directly obscured, can no longer be appreciated within the soft green setting created by the mature trees of its surrounding churchyard. The taller building encroaches from the south, dwarfing in mass and bulk the church tower and spire. By the nature of its scale and bulk the proposed development is considered to have a negative effect on the significance of St. Paul's Church, Deptford as a local landmark south of the river in the views towards St. Paul's Cathedral, although the impact on the latter, due to its location further north, is comparably low.
- 7.6.21 The negative impact on the view of St Pauls Deptford must be weighed up against the positive benefits of the development. It has been demonstrated that the amount of housing proposed for the site is the minimum required to make the scheme viable and in particular to pay for the refurbishment of the existing buildings and the retention of the site's creative uses. Thus on balance, the adverse massing issue is considered to be outweighed by the benefits of the scheme. It is important to note that the detailed design of the buildings has been developed to reduce the adverse effect on St Pauls Church as much as possible by way of the pop-up roof elements with certain set backs and careful architectural treatment to these elements. This is considered to help address the massing issue to some extent.

- 7.6.22 On balance, it is not considered that the proposal harms the view of St Pauls Deptford to a significant extent so as to justify refusal of planning permission.
- 7.6.23 The taller building (04) would be seen from Creekside, however it has the smallest footprint and would not negatively impact much of the surrounding area in terms of overshadowing and views. Although its height is not in accordance with the Council's Building Strategy, it is deemed to be acceptable in principle due to the numerous other tall buildings in the wider vicinity, most of which are across the Creek in Greenwich. It is useful to note that the tower's height is comparable to the nearby Mumford Mill building in Greenwich. Given the building's prominence, its success lies in its architecture and how the elevations would be treated to ensure that the building's appearance is not overbearing and that it creates a welcomed new addition to the area's skyline (more details below).
- 7.6.24 On balance the height, scale and massing is considered to be acceptable taking into account the context of the site surroundings and the design quality demonstrated in the proposal.

Architecture

- 7.6.25 It is considered that through the extensive design discussions, a high level of architectural quality has been achieved for the proposal. The design team have demonstrated their commitment to providing exceptional design by including detailed sections and elevations as part of the application. In addition, to ensure that the commitment to design quality is continued throughout the build-out process, the applicant has agreed to a s106 obligation to secure the architects' continued involvement in the delivery of the scheme.
- 7.6.26 The architectural proposals attempt to reflect the gritty industrial character of the area while still providing some warmth more appropriate for residential accommodation. Through basic, but elegant design details and a simplified palette of brick, concrete, metal and wood, such a desire is largely achieved. However it is felt that this local character could be further emphasised. Thus, it is suggested that an urban artist is employed throughout the continued design work and build phases. Such an artist should not be employed to construct a built piece or add an unnecessary layer to the proposed design. But rather, the artist should work with the architecture to help further its place identity. Suggested locations for this work include the entrance lobbies, the external stairwells and walkways, and the courtyard spaces. The applicant has agreed to this approach which would be secured by the s106 agreement,
- 7.6.27 The architectural quality of the proposal is most importantly seen in the tall building. Due to its prominence, its appearance is of paramount importance. In particular, for this building the architecture should be used to help break down the scale. The proposed building successfully achieves this need without resorting to an excessive and arbitrary material palette. Through the building's angled cut back (which is modelled to not impact views), its organised rhythm, its generous window proportions, and its use of quality brickwork, the design creates an aesthetically pleasing building that would not appear bulky and/or inconsistent in the area.

- 7.6.28 The contemporary design and architectural treatment for the café pavilion is welcome. It is considered that the café would be read as a high quality addition to Building A. The design and materials palette would contrast well with the traditional form and appearance of Building A. This addition would make a positive contribution to the streetscene and in many ways will have a greater impact on the streetscene and character of the area than the taller buildings proposed for the rear of the site.
- 7.6.29 In relation to the architectural quality, discussions have already occurred in regards to materials. It is felt that the design team's general principles for the proposed materials to be used are acceptable. However the exact specifications have not been provided and therefore a materials condition would be attached to the permission.
- 7.6.30 The approach to the proposed refurbishment of the existing buildings has been discussed in detail with the Conservation Officer. The light-touch approach to retain the architectural integrity and character of the buildings is welcome as is the proposed strategy for repairing, replacing and inserting new fenestration. The inclusion of a modern bridge between Buildings A and C is strongly supported. There are detailed elements such as roof covering, windows, doors and treatment to the brick that need further discussion. Consequently these elements would be controlled by conditions.
- 7.6.31 The retention, repair and restoration of the water tower is a key aspect of the development from a conservation perspective. Future use of the tower should also be explored. This would be secured as part of the s106 agreement.
- 7.6.32 Overall the proposal is considered to represent a high quality design in architectural terms.

Landscaping

- 7.6.33 Throughout the pre application process and assessment of this application Officers have been engaged in extensive discussions with the applicant regarding appropriate landscaping for the site. Landscaping is an integral part of the development and is fundamental to ensuring high quality public realm, appropriate to the character of the site and surrounding area.
- 7.6.34 The applicant has sought to engage with the Creekside Centre when developing detailed landscaping proposals and has submitted detailed plans and 'landscape and ecology advice' from the Creekside Centre as part of the application. The CET document seeks to influence the landscape proposals in terms of maximising ecological benefit. The document includes a botanical survey of the site and then goes on to suggest appropriate landscape treatment, species and management.
- 7.6.35 The concept is to provide a hard surface through the centre of the site (AxoGold) which would define the extent of the street and vehicular access, a change in hard surface materials (granite stones) would be used for the courtyards, entrance lobbies and public spaces. Concrete and timber would be used for furniture and planters and natural playspace for 0-5 years olds would be created within part of the communal open space adjacent to the Creek. Interaction with the Creek would be encouraged by way of a raised seating wall/viewing platform around the

Creek edge boundary and it is proposed to utilise an existing metal staircase within the site as a raised viewing platform to provide views across the Creek.

- 7.6.36 In terms of soft landscaping it is proposed to introduce planting in the courtyard of Building A, trees along the residential street and fairly large areas of planting within the eastern section of the site, adjacent to the Creek. An extensive area of rubble and crushed aggregate colonised by native Creek species and sown with a native wildflower mix is proposed for the eastern section of open space.
- 7.6.37 Whilst the ecological approach to landscaping is understood and the rationale for this approach appreciated, it is felt that the proposed landscaping does not best reflect the industrial character of the area. The proposed approach to hard landscaping for the shared street, courtyards and residential street together with the proposals for providing interaction with the Creek and the provision and location of playspace is strongly supported. However, the overall landscaping proposal is not acceptable.
- 7.6.38 Specifically, the treatment is too soft along the Creek edge to both the east and the south. These concerns have also been raised by the Councils Design Review Panel, Urban Design and Conservation Officers. The undesired softness is a result of the quantity of the planting and not the specific species. Therefore, it is suggested that the planting along the southern edge (to the south of the tall building not the area near Building A) should be removed completely. Likewise the amount of planting on the south east corner should be reduced. It is felt that more planting could actually occur along the northern edge, to help with biodiversity. Reducing the planting as described above could also have the benefit of providing more spill out space for the commercial unit on the ground floor of the tower.
- 7.6.39 There is a fine balance to be struck with the landscaping of this site between ecological benefits, providing high quality public realm and reflecting the industrial character of the site. As currently presented the detailed landscaping proposal cannot be agreed and therefore the documents submitted with this application would not be approved, but have been useful as background information to demonstrate a general concept and to guide appropriate plant species for the areas which are acceptable as soft landscaped. Conditions would be attached to ensure that detailed landscaping is further explored. As landscaping is fundamental to the success of this site it is considered appropriate to deal with this as a pre commencement condition.
- 7.6.40 It is not considered that a reduction in soft landscaping would adversely affect ecology or the opportunities to enhance biodiversity on site as areas of soft landscaping would comprise appropriate species and there are other opportunities to address ecology and biodiversity as discussed in later in this report.

Response to the Creek

- 7.6.41 As this site is located immediately adjacent to the Creek and shares much of its boundary with the Creek it is important for the development to respond to its setting as part of the Blue Ribbon Network. London Plan policies recognise the Blue Ribbon Network as a strategically important series of linked spaces. Policies require development proposals to increase the use of London's water bodies for appropriate use whether that be for transport, recreation, amenity or ecology.

Core Stagy Policy 11 reinforces the need for development adjacent to rivers and the waterway network to contribute to their special character. It is in this context that the applicant was asked to explore an appropriate response to the Creek whether that be transport use, additional moorings or an ecological response together with the urban design rationale for the relationship of buildings/open space to the Creek.

- 7.6.42 The applicant explored the possibility of additional moorings with the Port of London Authority. As a result of those discussions it was ascertained that there would only be a small area that could accommodate additional moorings in principle. The PLA response is set out in full in paragraphs 5.16 of this report.
- 7.6.43 In order to accommodate additional moorings in the area identified by the PLA it would be necessary to undertake some fairly extensive works within the Creek to support the moorings. Discussions with the Environment Agency revealed that this would be objectionable. The applicant concluded that it would not be appropriate to include additional moorings as part of the proposal.
- 7.6.44 Instead the applicant is seeking to respond to the Creek in terms of amenity and ecology. It is proposed to install ecological fenders on part of the Creek wall. This would be discussed in more detail under the ecology heading later in this report.
- 7.6.45 The applicant has confirmed that they would also explore the possibility of using the Creek for the transportation of construction materials and demolition waste.
- 7.6.46 In terms of amenity it is proposed to maximise public access to the Creek, although people would not be able to enter the Creek as this would harm ecology if uncontrolled, the design of the development is such that public open space would be located adjacent to the Creek and facilities provided to give access to raised viewing platforms.
- 7.6.47 Third parties have raised concerns that the amenity space adjacent to the Creek would be overshadowed. Whilst there would be a degree of overshadowing from the new buildings at certain times of the day, the daylight/sunlight assessment confirms that this space would still meet BRE guidance. A minimum of 50% of the space would receive at least 2 hours of sunlight each day. Despite the level of overshadowing that would occur at some intervals it is considered that this space is of appropriate size to offer a real public benefit. The opportunity to open up access to the Creek for members of the public is welcome. Detailed landscaping would be controlled to ensure that high quality public realm is delivered.
- 7.6.48 Concerns have been raised regarding the viewing platforms in terms of creating opportunities for people to drop litter into the Creek. It is considered that the opportunity to provide this level of interaction with the Creek is a positive benefit of the scheme. There would of course be management issues but this is for the applicant to resolve and control.
- 7.6.49 On balance, the response to the Creek is considered to be appropriate given the constraints of the site and its surroundings and the scale of the development proposed.

Residential Density

- 7.6.50 Policy 3.4 of the London Plan seeks to ensure that development proposals achieve the maximum intensity of use compatible with local context, design principles and with public transport capacity. Table 3.2 in the London Plan 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).
- 7.6.51 The site is in an 'urban' setting and has a PTAL rating of 4 giving a London Plan indicative density range of 70-260 units per hectare, or, 200 to 700 habitable rooms per hectare (dependent on the unit size mix). The proposal is for 539 habitable rooms per hectare. This is in line with the density range of the Plan and acknowledges the area for intensification and an opportunity area within the London Plan and Core Strategy Policy 2 which confirms that Deptford would provide key regeneration and development opportunities.

Site Security

- 7.6.52 Secure by Design principles have been considered as part of the design process and the Designing Out Crime Officer has been consulted.
- 7.6.53 The layout and position of buildings within the site and mix of uses has been designed to maximise activity and natural surveillance within the site as well as introducing surveillance to surrounding areas which are currently not overlooked (Mechanics Path and Ha'Penny Hatch Bridge). The café and new windows in the ground floor front façade of Buildings C would introduce activity to Creekside which is welcome at this point where the street currently lacks any animation.
- 7.6.54 The site would be publically accessible during the day with high levels of activity. A site centre manager would be present to oversee the commercial units. The commercial units would also be active during the evening but a night security guard would be present to control access to the development. The vehicle exit point to the north of the Creekside boundary would be gated and controlled via a fob access. A Public Access and Site Security Management Plan would be secured by the s106 agreement.
- 7.6.55 The site is not easily accessible from the Creek. The existing wire mesh fencing would be removed and replaced with a new lower balustrade. The northern boundary with the Creekside Centre would be maintained at the request of the Creekside Centre.
- 7.6.56 The main east-west and north-south routes in the site aid legibility and are designed to ensure they are visually open, direct and well used. Changes in road surface and landscaping would help define defensible space.
- 7.6.57 All residential areas are designed to be well lit and visible from other areas of the site. Cycle stores have been designed to be secure.
- 7.6.58 Well integrated lighting and CCTV would be installed throughout the site. This will form part of the Site Security Management Plan.

Open space and Play Facilities

- 7.7 It is proposed to provide a fairly generous communal space within the eastern section of the site, adjacent to the Creek which would be open to members of the public as well as for use by commercial and residential occupiers of the site. This space can be used for informal recreation, it could accommodate temporary exhibitions for the commercial uses and would provide play space for children and a chance for the public to interact with the Creek.
- 7.7.1 This site is located within close proximity of a range of public open space and dedicated and multi-functional play spaces. There are two play areas for 0-5yrs within 100m of the site (Crossfields Estate Play Areas), Ferranti Park which has facilities for 5-11yrs located within 400m of the site and seven play spaces for 11+ yrs within 800m of the site (Margaret McMillian Park, Deptford Adventure Playground, Evelyn Green, Broadway Fields, Brookmill Park, Claremont Street and Bardsley Lane). Whilst these facilities are in close proximity of the site it is recognised that pedestrian and cycle routes to these facilities are in need of environmental enhancement to ensure direct, safe, legible and attractive access to the facilities from the site can be achieved. There is also opportunities to enhance some of the play facilities within this area as well as other public open spaces.
- 7.7.2 Based on the Mayor's playspace SPG, 28 children are predicted to live in the development of which 17 would be under the age of 5. This gives rise to a total child playspace requirement of 280 sq.m. of which 170 sq.m. should be on-site and designed for under 5s. This application proposes the provision of 170sqm of natural play facilities on site which is acceptable.
- 7.7.3 It is not proposed to provide dedicated facilities for over 5's on site. Whilst there are facilities within adequate proximity of the site as discussed above there is a need to enhance facilities and routes to them. There is also a requirement to address the impact of the proposal on other forms of open space. Consequently the impact of the development in this respect would be mitigated by virtue of a financial contribution towards open space, transport and public realm as set out in the s106 Heads of Terms later in this report.

Highways and Traffic Issues

- 7.8 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 7.8.1 London Plan and Core Strategy Policies encourage sustainable transport modes whilst recognising the need for operational parking for commercial uses and disabled parking facilities. Car parking standards within the London Plan should

be used as a basis for assessment. Priority should be given to enhancing pedestrian and cycle routes and promoting use of sustainable transport modes through a Travel Plan.

Transport Assessment

- 7.8.2 This planning application is accompanied by a Transport Assessment to assess the impacts of the Development on the local highway and transport network, including during the construction period as well as the operation of the development.
- 7.8.3 The report outlines the relevant policies at the national, regional and local level and then sets out the baseline conditions for the site, in terms of the local highway network, public transport and the existing usage of the site. The report notes that the site is currently occupied by office/light industrial units and studios leased on a temporary basis totalling approximately 9,300sqm Net Internal Area with approximately 60 on-site parking spaces.
- 7.8.4 Traffic surveys were undertaken to establish the vehicle movements generated by the existing site which recorded 20 two-way movements in the AM peak hour, 30 two-way movements in the PM peak hour and 291 two-way daily movements.
- 7.8.5 Details of the proposed development were provided within the Transport Assessment including a development schedule which described the development as 5,089sqm GEA (3,373 sqm NIA) of B1 Workspace and 148 residential units. Additional information submitted clarified that this would consist of 46 units made up of micro, small and medium business enterprises in units of varied size. The total proposed car parking provision is:-
- 20 car parking spaces for the residential units (15 of which would be DDA spaces for the wheelchair units);
 - 7 car parking space for the commercial use (1 of which would be a DDA space)
 - 1 car club parking space.
- 7.8.6 It is stated that parking would be provided at ground level across the site and would be strictly controlled within the development through a Parking Management Plan for both the commercial and residential uses. The Plan would establish which of the parking spaces would be sold to residents, leased by residents and commercial tenants and flexibly allocated. It is proposed that regular monitoring surveys of the site and on Creekside to ensure the development is not having an impact on informal parking pressure with possible mitigation including the extension of a Controlled Parking Zone or implementation of periods of control. No analysis of proposed parking demand and impact on surrounding highway network was included within the Transport Assessment. [The parking demand and on-street parking capacity assessment was provided in additional information submitted].
- 7.8.7 It is noted that the development would provide 210 cycle parking spaces (34 commercial and 176 residential) and 5 motorcycle parking spaces. The cycle parking provision exceeds the London Plan minimum standards.
- 7.8.8 Refuse would be stored on the ground floor of the development with collections being made on-site via the internal access road.

A Delivery and Servicing Plan has been produced for the proposed development to provide a management framework to improve safety, efficiency and reliability of deliveries and servicing. Access into the site would be managed and controlled by a management company. It is proposed to provide a safeguarded access routes through the site for Environment Agency and DLR maintenance vehicles.

- 7.8.9 Future trips for the development have been predicted using the TRAVL database. The TRAVL database has also been used to establish the predicted modal split with adjustments made to take account of the locations and accessibility of the site and the proposed level of car parking. The Transport Assessment notes that there would be a slight net increase in vehicle trips of 15 two-way trips in the AM peak hour, 3 two-way trips in the PM peak hour and 35 two-way daily trips as a result of the proposed development. The impact on the highway and public transport network is assessed and it is concluded that the proposed development would have a minimal impact upon the operation of the highway network in the vicinity of the site and would have no material impact on the public transport network accessible from the site.
- 7.8.10 An assessment of the effects of construction activity on the local road network was included within the Transport Assessment based on the assumption that all materials would be moved by road. It is noted that on average there would be 90 (one-way) construction vehicle trips per day which equates to 9 one-way trips per hour based on a 10 hour day (08:00 – 18:00), or one vehicle trip every 6.5 minutes. It is argued that the level of daily and peak construction vehicle movements are less than the existing vehicle trips currently accessing the site. [This figure excludes vehicle trips associated with construction workers and staff and also includes for traffic movements during the network peak hour which would normally be restricted thus reducing the working day compared to that assessed]. It is proposed that construction workers would be prohibited from parking on-street which would be monitored and enforced by the construction contractor. The Transport Assessment includes a Construction Logistics Plan.
- 7.8.11 Separate Framework and Residential Travel Plans accompany the Transport Assessment. They set out various targets to reduce the number of trips to and from the land uses by car and increase trips by sustainable modes such as walking, cycling and public transport. The Framework Travel Plan targets include a reduction in single occupancy car trips from 25% to 15% in five years, whilst the residential Travel Plan single occupancy car driver modal share target reduction is 4% in five years from 17% to 13%.
- 7.8.12 Key measures of both Travel Plans include the appointment of a Site-wide Travel Plan Coordinator, raising awareness of sustainable modes of travel through site-wide marketing strategy, promotion of travel options for accessing the site, internet connection for each residential units, promotion of smarter working practices, promoting cycle training and a bicycle user group and the monitoring of on-site and on-street car parking. The implementation of the measures would be managed by an appointed Travel Plan Coordinator who would be appointed prior to occupation. The monitoring of both Travel Plans would take place within 6 months of opening or at 75% occupancy and then at years 3 and 5 of operation. The Travel Plans include an Action Plan as well as details about its on-going funding.

7.8.13 Following requests for more accurate highways information, the applicant has submitted documents that update the Transport Assessment in terms of the trip assessment, highway capacity analysis, predicted parking demand and on-street parking capacity and has also submitted a Draft Car Park Management Plan to provide additional information as to how the predicted car parking demand would be managed, monitored and negative impacts on the surrounding highway network mitigated.

a) Access

7.8.14 The site is located to the east of Creekside which is not served directly by public transport but is within a reasonable walking distance of Greenwich DLR and National Rail station, Deptford Bridge DLR station and Deptford National Rail station, whilst the nearest bus stops are located on Deptford Church Street to the west. It has a Public transport Accessibility Level (PTAL) 4, where '1' is rated as Poor and '6' is rated as Excellent. The Council score Strategy Policy 15 'High Quality Design for London' and London Plan Policy 2.13 'Opportunity Areas and Intensification Areas' encourage relatively dense development to be located in areas such as Lewisham where the PTAL is Good or Excellent.

7.8.15 A Pedestrian Environment Review System (PERS) assessment of the surrounding area was undertaken by the applicant which concluded that overall the pedestrian environment within the vicinity of the proposed development is generally positive, well maintained and of good quality. The PERS assessment did not identify the east-west route to the site through Crossfields as it doesn't formally exist.

7.8.16 The applicant sought to build upon the PERS assessment with a detailed analysis of the quality of pedestrian and cycle links to the site. The Design and Access Statement identifies key pedestrian routes to the site as being Creekside and the east-west route from Deptford Church Street to Creekside via Crossfields and then from Creekside to Greenwich via the Ha'Penny Hatch Bridge. It is recognised that this east-west route (Mechanics Path) is the missing link in the network and there are a number of environmental improvements required to make this route direct, legible, safe and attractive. The applicant has identified measures required to enhance this east-west route from the site and Creekside as a priority for providing access to a range of local amenities and public transport options.

7.8.17 Lewisham Council has a long standing commitment to improving the pedestrian and cycle networks in the Borough. The North Lewisham Links Strategy (2007) identifies options for improving pedestrian and cycle routes in the Deptford and New Cross Area and has formed the basis for successful bids for government funding as well as informing the approach taken to improving a number of pedestrian links and enhancement to public spaces in recent years. A review of this work has been commissioned to look at progress to date, update the context in which existing or new projects would come forward and to identify future priorities and funding bids.

7.8.18 The draft update covers the area within the vicinity of the Faircharm site. The document reflects on other important studies such as 'Deptford Creekside Charette' (2009) and 'Creekside Tie-In Deptford'(2009). The document identifies improvements required to Deptford Church Street crossings as well as the east-west route from Deptford Church Street to Creekside. This work has informed the discussions regarding necessary environmental improvements to mitigate the impact of the development at Faircharm.

- 7.8.19 It is clear from the work undertaken by the applicant and Lewisham Council together with the views of TfL that significant environmental enhancements are required to pedestrian and cycle routes within the vicinity of the site to enable direct, safe, legible and attractive routes from the site to local amenities and public transport facilities. An appropriate contribution has been negotiated with the applicant and would be secured via the s106 agreement as set out in the Heads of Terms in this report.
- 7.8.20 Pedestrians (and cyclists) would be able to access the site from Creekside. It is proposed to improve the eastern Creekside footway adjacent to the site with a minimum width of 2m. Signage and way finding would be provided within the development providing directions and distances to local amenities and transport connections.
- 7.8.21 Vehicular access into the site would be from Creekside. It is proposed that the development would operate a one-way circulation with vehicle entry positioned centrally on the site frontage and a vehicle exit to the north of the site. Vehicular access into the proposed development would be monitored and controlled through the implementation of the Car Park Management Plan as part of the overall management of the site.
- 7.8.17 It is recommended that a Framework Travel Plan for the commercial element of the proposed development and a Residential Travel Plan is secured by way of a conditions prior to first occupation of either element of the development. The Travel Plans are to include suitable monitoring mechanisms, including the monitoring of on-site and on-street parking, and the requirement to appoint a Travel Plan Coordinator.
- 7.8.18 Within the site level access would be provided by way of the shared surfaces with no delineation between pavement and road. This level access extends into all of the buildings except Building A where there is a requirement for ramped and stepped access to deal with the 1.6m level change.

b) Servicing

- 7.8.19 All servicing and delivery activity would be undertaken at ground level with service and delivery vehicles using the site entrances on Creekside and the one-way internal road to access the site. The proposed development also provides a safeguarded access route within the site to safely accommodate Environment and DLR maintenance vehicles. The swept path analysis submitted with the Transport Assessment clearly demonstrates that arrangements could safely and adequately facilitate access for all types of vehicles anticipated to require entry into the site.
- 7.8.20 It is not proposed to physically restrict vehicular access into the development however servicing and deliveries at the site would be strictly managed and monitored as set out in the submitted Delivery and Servicing Plan, whose implementation would form part of the overall management of the site. A condition is recommended which requires the implementation of the DSP prior to the occupation of the site and to ensure that suitable mechanisms to monitor and improve the plan are put in place.

c) Cycle Parking

- 7.8.21 As stated above, the total proposed level of cycle parking exceeds the London Plan minimum standards for this development and thus is considered acceptable. The location of the spaces in relation to the units they would serve accords with current best practice and the cycle parking would be covered and secure. Suitable conditions are recommended to ensure that the cycle parking proposed is provided prior to occupation

d) Car Parking

- 7.8.22 The development proposals include the provision of 0.14 spaces per residential unit which is below the maximum permissible standard for this development. The low level of car parking for the residential units is considered to be acceptable given the good PTAL of the site and the location of public transport facilities within a reasonable walking distance. Subject to the future occupiers of the residential units being restricted from applying for parking permits in future Controlled Parking Zones (CPZs), including extensions or adjacent CPZs, the residential car parking numbers are considered to be acceptable. The level of car parking proposed is supported by TfL
- 7.8.23 The level of accessible spaces accords with London Plan standards and SELHP requirement to provide 1 space per wheelchair unit. One additional accessible space would be provided for the commercial element. The management of all car parking spaces would be included in the Car Park Management Plan and Travel Plan which, as stated above, both include the monitoring of car park usage on-site to ensure that adequate spaces are provided to support occupiers of accessible units and that additional accessible spaces could be incorporated within the site as required.
- 7.8.24 The proposed car parking provision for the commercial element of the development is 7 spaces, including one accessible space which accords with the maximum London Plan standards based on Gross Floor Area for Workspace Office units. This level of parking is supported by TfL.
- 7.8.25 Based on projected employment figures and predicted modal share LBL expressed concerns that the commercial element has the potential to generate the need for on street parking resulting in negative impacts on the surrounding highway network. Sensitivity testing provided by the applicant demonstrated that the commercial element would generate an on-street parking demand of 35 spaces with a 25% modal share and 18 spaces with a 15% modal share. The accompanying parking beat survey recorded a total of 359 unrestricted spaces of which a maximum of 256 cars were parked with a minimum spare car parking availability of 103 spaces. Therefore, the sensitivity testing submitted by the applicant confirmed that there would be sufficient spare on-street parking capacity to accommodate the predicted demand.
- 7.8.26 The analysis was independently checked and a number of discrepancies in the level of available parking were found, most notably that the total unrestricted spaces stated included areas on Creekside where single yellow line restrictions apply and areas of dropped kerbs that provide access to residential car parking on Berthon Street. The applicant has acknowledged that these areas should not be considered as available parking and thus the overall level of parking available on the public highway would be less than that assessed.

7.8.27 The sensitivity test also included the residential parking areas within the Crossfields Residential Estate which are not public highway and are clearly allocated for residents of the housing estate only. Therefore, LBL does not accept that it would be reasonable for these spaces to be available for parking for Faircharm Estate users and as such, the minimum available spaces within the public highway would be 132 spaces. The maximum parked in these spaces during the peak demand period ranges from 115 to 120 and as such, the existing spare capacity is 12 – 17 spaces resulting in a potential shortfall of up to 23 spaces with a 25% car driver modal share and a shortfall of between 1-6 spaces with a 15% car driver modal share.

- 7.8.28 Any shortfall in parking supply is most likely to occur during the peak demand period, which was observed as being the weekday period from 9am – 3pm. This suggests that the fluctuations in peak demand are related to vehicles travelling to the area, rather than residents. It is therefore likely that the impact of any shortfall would affect visiting traffic - any resulting modal transfer to more sustainable modes would be in line with transport policy.
- 7.8.29 The nature and timing of the observed parking patterns may limit the potential impact on local residents, who should retain sufficient kerb-side capacity at key times in late afternoon and evenings. In addition, the areas of private land which offer designated parking for local residents also offers a reasonable degree of insulation from parking demand. However, parking pressure from a variety of sources in the local area would continue to affect local residents and, subject the processes set out in the Council parking Policy, a CPZ would be the most appropriate solution to control cumulative parking pressures on the public highway.
- 7.8.30 As with the residential parking, the commercial car parking would be strictly controlled through the implementation of a Car Park Management Plan, secured through S106 obligations, which would establish which spaces would be leased to commercial tenants and which would be flexibly allocated to ensure that parking is used efficiently to minimise impacts on surrounding roads. This would be supported by the Travel Plan which includes for the undertaking of surveys on surrounding streets once the development is operational. In addition to the measures set out in the Travel Plan, the applicant has agreed a S106 contribution of £35,000 for the undertaking of a consultation on the implementation of a CPZ.
- 7.8.29 Subject to a Car Park Management Plan and associated S106 obligations being agreed, including the restriction of all occupiers of the development from applying for parking permits, it is considered that adequate mitigation can be put in place to address the potential impacts on the on-street parking demand and therefore, the level of on-site car parking provision for the commercial units is considered acceptable.

e) Car Club

- 7.8.30 It is proposed to provide one car club parking space on site for use by residents and commercial tenants as well as the general public. As part of the s106 agreement all residential units (first occupiers only) would receive a period of free membership and £25 driving credit; whilst each business tenant (first occupiers only) would receive a period of free access to a business account.

7.8.31 There are also 6 car club spaces operated by ZipCar in close proximity of the site (10 minute walk) and a further 5 located within a 20 minute walk.

f) Refuse

7.8.32 Refuse storage points are located in specified areas on the ground floor with separate areas for commercial and residential waste to reflect the differing storage and collection requirements. The location of the waste collection points for both land uses accord with current standards in relation to access by the refuse vehicle and pulling distances by waste operatives and as such, it is proposed that refuse vehicles can either access the waste collection point individually or remain in a central location and waste operatives can wheel the bins to the vehicle. There are no outstanding concerns about the size and location of the waste collection points proposed. The refuse arrangements would be secured through the Delivery and Servicing Plan.

g) Blue Ribbon Network

7.8.33 Policy 7.26 of the London Plan states that development proposals close to navigable waterways should maximise water transport for bulk materials, particularly during demolition and construction phases. The use of the river and waterway network for transport purposes is supported by Core Strategy Policy 11. Given the sites location adjacent to the Creek it is considered important to explore the option of transporting construction material and waste from the site via the Creek. This would help to reduce the road borne vehicle trips which would reduce congestion and traffic in Creekside. The applicant has agreed to explore this option as part of the Constructing Logistics Plan for the site. This would be secured by condition.

h) Construction

7.8.34 The Transport Assessment and Environmental Assessment estimated that there would be some 90 one-way construction vehicle movements per day, equating to 9 trips per hour based on a 10-hour working day between 08:00 – 18:00. However, it is considered that the hours of delivery should be restricted to avoid the network peak hours of 08:00 – 09:00 and 16:00 – 18:00 to minimise the delay and impacts of construction vehicle movements on the surrounding highway network. This would result in a more concentrated arrival and departure profile of approximately 13 vehicles per hour. In order to mitigate the potential impacts during the construction phase of the development a Construction Logistics Plan (CLP) would be secured by way of a planning condition, in line with London Plan Policy 6.14 (Freight) as would the provision of a Construction Environmental Management Plan. These plans would control the impact of construction activity on the highway and would also ensure that the construction takes into account the cumulative impact with other development that could be on site at that time, should planning permission be granted.

7.8.35 Creekside is a designated cycle route and thus, there is an increased risk of conflict with cyclists on this narrow road during the construction phase as a result of the increase and intensification of large vehicle movements on this route. Of particular concern are the larger vehicles such as low-loaders carrying construction machinery and large cranes which have a poorer turning circle and larger swept path than the refuse and delivery vehicles currently using Creekside.

Therefore the Construction Logistics Plan should include appropriate mitigation to mitigate the risk of conflicts with cyclists including a swept path analysis of the larger construction vehicles, vehicle routing, traffic management measures and the use of banksmen etc.

Highway Improvements

- 7.8.36 A s278 agreement is required to undertake improvements to the eastern footway of Creekside adjacent to the site to provide a minimum width 2.0m wide footway, as shown on the submitted plans. The works are considered to be a vital part of the high quality environment the development proposals are seeking to create in order to enhance pedestrian accessibility to and from the site. Consequently the s106 should include an obligation to enter into a s278 agreement which should also include an obligation to secure any necessary repair works to the footway and carriageway of Creekside along the specified construction vehicle routes and in front of the development site in the instance that this is damaged during construction. This is considered necessary to safeguard the pedestrian and cycle environment within the vicinity of the Site.

Conclusion

- 7.8.36 Based on the trip generation the Transport Assessment predicts a minimal net increase in vehicular trips and that, due to the nature of the proposed commercial units, a large proportion of these would be undertaken outside of the traditional peak hours. As a result the Transport Assessment concludes that the proposed development would not have a material impact on the surrounding highway and public transport network.
- 7.8.37 As stated previously, the proposed development does have the potential to generate a need for on-street parking demand which exceeds the existing available capacity. Creekside and the surrounding streets are not covered by a Controlled Parking Zone (CPZ) and as such a S106 contribution should be secured for the undertaking of a study into the implementation of a CPZ in the surrounding areas and future occupiers of the development should be restricted from applying for parking permits.
- 7.8.38 With the controls that are proposed to restrict occupiers' right to a parking permit, the submission of Framework and Residential Travel Plans, the low levels of on-site car parking and the implementation of a Delivery and Servicing Plan, it is felt that sufficient controls would be in place, to control the effects of the proposed development.
- 7.8.39 The transport document submitted have been independently assessed and it is considered that the additional information about traffic impacts provided by the applicant is sufficient to demonstrate that the level of trips predicted to be generated by the proposed development would not have a significant impact on the surrounding highway and public transport network in terms of capacity and operation and that potential impacts on on-street parking could be mitigated against.

Impact on Adjoining Properties

- 7.9 Policy HSG4 of the UDP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.
- 7.9.1 This site is adjoined by the APT Studios to the south with residential properties located to the west of the site on the opposite side of Creekside and the Creekside Ecology Centre to the north. The Creek separates the application site from a mix of commercial and residential properties to the east.
- 7.9.2 As well as the impact on adjacent residential properties, an important consideration is the impact of the development on the Creekside Centre to the north of the site, specifically with regard to any loss of light or overshadowing to the external amenity space for the Centre which is used as a education resource as well as supporting ecology and biodiversity.
- 7.9.3 The impact of the development on the APT building to the south, is a consideration but given the use of this building it is not necessary to protect amenity to the same degree as a commercial or educational building.

Daylight/Sunlight/Overshadowing

- 7.9.4 An assessment of daylight and sunlight has been carried out for the development in accordance with the Building Research Establishment's good practice guide "Site Layout planning for daylight and sunlight". This allows the Council to consider the impact of the proposal on the extent of daylight/sunlight received in the windows of adjacent properties serving the rooms used most frequently. This is useful in assessing the extent to which the site layout allows for natural lighting, but is only one factor in considering whether the scheme is well designed and should be considered in the context of the overall approach to the design of the scheme.
- 7.9.5 It is also important to note that the BRE guidance includes a level of flexibility within its application and for instance, developments in urban areas are treated differently to suburban areas because expectations of daylight and sunlight into properties differ in such locations. Consequently, it is often necessary to aim for different 'target values' of daylight and sunlight into rooms according to the location of the development.
- 7.9.6 As originally submitted the daylight/sunlight assessment contained inaccuracies. Consequently a revised assessment was submitted as part of the ES Addendum, in addition overshadowing studies were included within the Design and Access Addendum.
- 7.9.7 The assessment of daylight is based on the calculation of the vertical sky component (VSC) to an affected window in both the existing and proposed condition. The VSC, simply put, is the amount of light received at the centre of a window. There is a further assessment that assesses the distribution of daylight within a room. This is called the average daylight factor (ADF). Whereas VSC assessments are influenced by the size of obstruction,

the ADF is more influenced by the room area, the area of room surfaces, the reflectance of room surfaces and the transmittance of the glazing with the size of the obstruction being a smaller influence. The extent, to which the effect of a proposal on surrounding properties is considered significant, is dependent on the use of the room to which the window relates. The significance of any impact of proposals on non-habitable or less well-used rooms such as bedrooms is therefore reduced. In this case, the relevant tests are essentially whether less than 0.8 times the existing level of daylight and sunlight is retained within a room and whether more than half of any one garden space is over shadowed.

- 7.9.8 The site currently comprises buildings used for flexible workspace and other commercial uses. The buildings are, in general lower than the surrounding buildings, save for the Creekside Centre. As a result the surrounding residential buildings enjoy a level of daylight and sunlight across the site in excess of those found in a typical urban location such as this. For this reason losses of daylight and sunlight as a result of the development would be expected, with the quantum of light retained taking precedence over the percentage reduction.
- 7.9.9 The relevant properties tested are residential and educational buildings with windows that face the site (Wilshaw House, Holden House and the Creekside Centre). The adjacent APT studios was not assessed as it is not a residential or educational building. Only windows in the Creekside Centre were assessed for sunlight as they are the only windows facing 90 degrees due south.
- 7.9.10 The assessment shows that each of the surrounding properties currently enjoys 50% or less compliance with VSC levels. The light levels to both Wilshaw and Holden House are restricted by the deck access walkways which form part of the buildings and restrict the view of the sky to the windows below them. The VSC values of windows within Creekside Centre facing the site suffer restricted sky views due to the design of the building whereby there is a significant eaves projection which obscures the views of the sky for a large proportion of the windows.
- 7.9.11 The daylight levels received within the buildings is typical for these type of properties in such an urban location.
- 7.9.12 The assessment shows that 80% of the windows tested for the Creekside Centre would meet BRE VSC target values. The majority of the windows tested serve rooms with multiple windows. The north facing windows would remain unaffected by the development such that any modification to existing daylight levels would be imperceptible to the occupants. All rooms would maintain BRE compliant levels of sunlight access. Consequently the effect of the development on the use of the centre is stated as negligible.
- 7.9.13 Sunlight results for the Creekside Centre indicate a 62% level of compliance as existing.
- 7.9.14 The overshadowing of the amenity space at the Creekside Centre has been analysed. The assessment shows that there would be an increase in overshadowing of the amenity space as result of the development but the amenity space would still meet the BRE guidance of receiving 2 hours or more of sunlight for at least 50% of the space on 21st March.

- 7.9.15 Permanent overshadowing assessment of the Creek has not been undertaken as the area is, by its nature, difficult to define within a boundary. Consequently an assessment of transient overshadowing of the Creek has been undertaken. The result shows that the majority of the Creek area adjoining the site would be left in full sun for most of the day with an element of transient overshadowing first thing in the morning and last thing in the afternoon.
- 7.9.16 The assessment shows that with the proposed development in place 47 (90%) of the 52 windows tested in Wilshaw House would comply with BRE criteria for VSC. Despite the limiting effects of the decked access to the properties the level of daylight received would still be reasonable and the development would have a minor adverse impact. Sunlight for Wilshaw House has not been tested as the windows do not face 90 degrees due south.
- 7.9.17 The assessment show that with the proposed development in place 50 (100%) of the 50 windows tested in Wilshaw House would comply with BRE criteria for VSC. Despite the limiting effects of the decked access to the properties the level of daylight received would still be reasonable and the development would have a negligible impact. Sunlight for Holden House has not been tested as the windows do not face 90 degrees due south.
- 7.9.18 A shadowing analysis has also been undertaken. Such analysis is useful in considering the impact of the scheme (taking into account block heights and proximity to one another) on sunlight in open spaces, but is more useful as a measure of sunlight in the summer months rather than during winter when spaces could be expected to be in shade for far longer periods. The assessment shows that there would be overshadowing of the amenity space within the site at different times throughout the year, although all of the space would receive a minimum of 2 hours sunlight in accordance with BRE guidance. There would be an increase in overshadowing of the Creekside Centre external space and parts of the Creek in the late afternoon, although BRE guidance would still be met in this respect.
- 7.9.19 There would be no increase in overshadowing of the APT building or its small yard given the existing built form. There would be a slight impact on morning sunlight to the west side of Creekside/Crossfields but this would not be significant.
- 7.9.20 Given the existing built form of surrounding properties and the impact of the existing buildings on site, it is not considered that the proposed development would cause unacceptable harm to neighbouring properties by way of overshadowing or loss of light. Any impact to the rooms within the Creekside Centre would be minimal. It is recognised that there would be an increase in overshadowing of the Creek and the amenity space for the Creekside Centre although BRE guidelines for permanent and transient overshadowing would still be met. Therefore it would difficult to sustain a refusal on this basis.
- 7.9.21 Notwithstanding the above it is recognised that any increase in overshadowing of the amenity space within the Creekside Centre could affect the way in which the site operates as an education facility despite the fact that BRE guidelines are met. An increase in overshadowing could change how the centre use that part of the site, in order to mitigate the impact a contribution has been secured towards community facilities which includes the Creekside Centre as set out in the s106 Heads of Terms later in this report.

- 7.9.22 In light of the above, Officers have concluded that the impact of the proposals on adjoining properties in terms of daylight, sunlight and overshadowing would be acceptable.

Light Pollution

- 7.9.23 The only additional commercial space facing the existing residential properties (Wilshaw and Holden House) proposed as part of the development would be the single storey café at the front of Building A. The existing retained commercial space which fronts onto Creekside and is opposite the residential properties would be refurbished. The refurbishment would introduce some further apertures facing onto Creekside. However, the increase in glazed area of the refurbished units and the café is not significant such that any light spillage would be greatly increased. Furthermore sufficient distance would be retained between the residential properties and the Faircharm site to prevent unacceptable light pollution occurring.
- 7.9.24 The use of exterior lighting within the site would be restricted to that necessary for security and safe movement around the site. All exterior luminaries would be shrouded to ensure that upward spread of light is restricted and lamp outputs would be restricted to levels suitable for their task. Careful consideration would be given to the amount and type of lighting for the Creek edge and the boundary with the Creekside Centre. The detailed lighting strategy would be controlled by condition. Consequently it is not considered that the proposal would cause harm to neighbouring development by way of light pollution.

Outlook

- 7.9.25 Another important consideration is the impact of the development on the outlook from neighbouring properties and whether the development would have an overbearing impact. Views of the development from the Creekside Centre, the APT building and Crossfields Estate have been provided. Whilst it is clear that views of the Faircharm site from the neighbouring buildings would dramatically change it is not considered that there would be an adverse impact in this respect. Sufficient distance would be retained between the neighbouring windows and the new development to prevent any overbearing impact or loss of outlook.

Privacy

- 7.9.26 In terms of privacy it is not considered the proposal would have an adverse impact. There would be direct views onto the Creekside Centre and APT building from within the development but as these properties are not in residential use this is acceptable.
- 7.9.27 The relationship between the site and residential properties in the western side of Creekside would be similar to the existing situation. The retention of the existing Buildings A and C means that the level of overlooking onto properties on the opposite side of Creekside would remain similar to the current situation. Additional apertures would be created and the café would introduce a new relationship but sufficient distance would be retained between the site and residential properties in Holden/Wilshaw House to prevent any unacceptable level of overlooking or loss of privacy.

- 7.9.28 Given the distance that would be retained between the new blocks and residential properties on Creekside any overlooking would be at a sufficient distance to prevent a loss of privacy occurring.

Noise and Disturbance

- 7.9.29 It is recognised that during implementation of the development there would be a significant amount of noise and disturbance from construction related activity including vehicular traffic. Traffic has been discussed in paragraphs 7.8 of this report and the impact has been deemed to be acceptable.
- 7.9.30 Construction related noise and activity cannot be avoided when implementing a development of this nature and scale. This is a relatively short term impact that can be managed as much as practically possible through measures such as a Construction Environmental Management Plan (CEMP) and control of construction hours. The applicant has stated that construction would take approximately 3 years. On balance subject to control of the CEMP via condition it is not considered appropriate or reasonable to raise an objection to the proposal on the grounds of harm to neighbouring amenity from construction related activity.
- 7.9.31 Once operational it is not considered that the proposal would have an unacceptable adverse impact on neighbouring amenity by way of noise and disturbance. This site is currently a commercial site where a range of light industrial uses operate, the site forms part of a cluster of commercial sites that operate without detriment to nearby residential properties. In this context it is not considered that the proposed commercial use would generate any increase in noise and disturbance beyond that already experienced from the existing use. For this reason it would be inappropriate to raise an objection from this perspective.
- 7.9.32 For reasons discussed elsewhere in this report it is not considered appropriate to attach unduly onerous conditions controlling the use of the commercial space.
- 7.9.33 It is not considered that the residential element would give rise to significant harm to neighbouring amenity by way of noise or disturbance.
- 7.9.34 In conclusion for the reasons set out above the proposal is not considered to have a significant adverse impact on neighbouring amenity, this includes all properties surrounding the site as well as occupiers of the nearby motor vessels.

Sustainability and Energy

- 7.10 The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. The NPPF requires planning policies to be consistent with the Government's zero carbon buildings policy and adopt nationally described standards. In determining planning applications, Local Planning Authorities should expect new development to comply with adopted policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption

7.10.1 London Plan and Core Strategy Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions. For major development proposals there are a number of London Plan requirements in respect of energy assessments, reduction of carbon emissions, sustainable design and construction, decentralised and renewable energy. Major developments are expected to prepare an energy strategy based upon the Mayors energy hierarchy adopting lean, clean, green principles. Core Strategy Policies 7 and 8 support the London Plan principles and also require all new residential development to meet a minimum of Level 4 standards in the Code for Sustainable Homes and non-residential development to meet a minimum of BREEAM 'Excellent'.

Energy Strategy

7.10.2 This application was accompanied by a Energy Strategy and Sustainability Statement developed in line with the Mayors energy hierarchy. The development proposes:-

- Regulated CO² emissions are expected to achieve an improvement of 2-3% over the requirements of Part L 2010 through passive design and energy efficient measures;
- Glazing within the residential units would represent 40-45% of the façade area, commercial units would benefit from additional glazing and rooflights (where possible), glazing would be specified as solar control glazing, U-values for the building fabric would exceed Part L requirements, thermal bridging would be checked and quality controlled on site;
- Energy efficient lighting, boilers, white goods, chillers and ventilation systems would be utilised,
- Mechanical ventilation would be provided in the commercial units;
- Whole House Mechanical Ventilation System with heat recovery would be utilised within the residential units;
- The residential units would not have mechanical cooling, this is not required due to the design;
- Residential properties would be fitted with local heating controls and residents would be charged according to their heating consumption instead of a flat rate charge;
- Energy metering would be installed in the commercial and residential buildings;
- A community energy system would be implemented with a single site wide energy centre providing heat to all areas of the development (located in Building 04);
- A gas fired CHP system (1 no.35kWe unit and 1 no. 50kWe unit) would provide domestic hot water, a proportion of space heating to the whole site and electricity for the car parks, communal areas and landlords space within the site. This is expected to deliver a further reduction in CO² emissions of at least 21%;

- 133 sqm of Photovoltaic Panels (20.5kWp) would be installed on the roof of Building 04. This is expected to provide a further reduction of 7% in regulated CO² emissions, after the implementation of passive design, energy efficiency and CHP.

- 7.10.3 A preliminary study to assess the feasibility of connecting into a local district network has been undertaken. The nearest network is SELCHP which extends into central Deptford but is too far away from the site to connect at present. If the SELCHP network were to be extended in the future towards Creekside it may be possible for the site to join up and receive low carbon heat from the network. The internal layout of the energy centre has been designed to allow the CHP units to be replaced with a plate heat exchanger at the end of their expected lifespan (15-20 years), should a district energy network become available in the future to connect into (subject to financial viability and the environmental performance implications of connecting into the district scheme, relative to providing new CHP units). A condition would be attached to ensure that the necessary pipework is installed within the site as part of the redevelopment to enable future connection if possible.
- 7.10.4 A range of renewable energy technologies have been appraised. It is concluded that PV Panels are the most appropriate solution for use with the CHP. The roof of Building 04 would accommodate 133 sqm of panels.
- 7.10.5 After including low and zero carbon technologies, it is expected that the new building part of the development would have CO² emissions that are approximately 29% better than the requirements of Part L 2010 (regulated emissions only). This is therefore expected to exceed indicated Part L 2013 compliance levels, demonstrating very high carbon performance. This targeted improvement also exceeds the required 25% CO² reduction set out in Policy 5.2 of the London Plan.

Code for Sustainable Homes (CfSH) and BREEAM

- 7.10.6 The Energy Strategy and Sustainability Statement confirms that the residential units are aiming to meet CfSH Level 4 in line with policy requirements. The commercial units (refurbished and new) would aim to meet BREEAM 'Very Good'.
- 7.10.7 CfSH and BREEAM Pre Assessments has been undertaken for the proposed development to identify at this early stage in the design process, the maximum number of credits than can be achieved. The BREEAM Pre Assessment score shows the commercial units can only achieve a 'Very Good' rating. The reasons for this are the fact that a light-touch approach is being taken to the refurbishment of the existing buildings in order to retain the architectural character and significance of the buildings and new build units have been designed to have extensive areas of glazing to encourage active street frontage which has an impact on ventilation and heat calculations within the BREAAM assessment. It is also important to consider the financial implications of the some of the measure required to obtain an 'Excellent' rating as this would increase the service charge for the commercial units which is not desirable from the perspective of providing affordable business space.
- 7.10.8 The Pre Assessment shows that the development can achieve a rating 60.52% and the applicant has confirmed that they would endeavour to obtain more credits in the detailed design assessment.

The minimum score rating for 'Very Good' is 55%. BREEAM Assessors recommend that pre assessments must achieve more than 2 points above the minimum score to ensure that the development can meet the required standard in its detailed design (this allows for a margin of error in the pre assessment). The document submitted shows a clear commitment to meeting the 'Very Good' rating.

- 7.10.9 The approach taken to the refurbishment of the existing buildings is welcome from a conservation perspective. On balance it is considered that the heritage considerations outweigh the requirement for the new buildings to meet 'Excellent'. Particularly as the performance of the buildings in terms of energy and water consumption would be vastly improved from the current situation.
- 7.10.10 The fact that the new build units cannot meet 'Excellent' is regrettable. However, on balance it is considered that the proposal represents a sustainable form of development that addresses climate change policies in a variety of ways. The redevelopment would make effect use of this Brownfield site, the new buildings would be far more efferent in terms of energy, water and materials than any of the existing buildings on site, the proposal includes a site wide CHP and the mayors targets for CO2 emission are exceeded. The proposal includes high proportion of living roofs and incorporates sustainable urban drainage.
- 7.10.11 The development would bring a range of social, economic and environmental improvements to the area therefore Officers do not consider that it would be reasonable to refuse planning permission because the proposed commercial units cannot meet BREEAM 'Excellent' rating. It is considered that this would be difficult to justify at an appeal when an Inspector is likely to take a pragmatic approach to approving the application as an exception to Core Strategy Policy 8, giving significant weight to the positive benefits of the proposal, which include compliance with all other climate change polices as well as the commercial buildings meeting BREEAM 'Very Good' rating.
- 7.10.12 For the reasons stated, on balance it is recommended that this application should be approved subject to a condition requiring the residential units to meet CfSH minimum Level 4 and the commercial units to meet BREEAM minimum 'Very Good' as an exception to Core Strategy Policy 8. A condition would be attached requiring the development to achieve a minimum rating of 'Very Good' which allows the opportunity for the Developer to achieve a higher rating if possible at the time of preparing detailed construction drawings. The condition would require the submission of a Design Stage Certificate to confirm that the development is capable of meeting the standard. The Council would not look favourably upon any rating lower than 'Very Good'. Evidence that the constructed buildings do meet this standard would be required by way of submission of a Post Construction Certificate issued by an Accredited BREEAM Assessor.
- 7.10.13 It is important to note that significant weight has been given to the benefits of the proposal and its ability to meet all other climate change mitigation policies, which justifies this approach in this instance, but this should not be regarded as setting a precedent for other developments of this nature not meeting the required BREEAM standard, which would need to be assessed on their merits.

b) Living Roofs

- 7.10.14 Policy 5.11 of the London Plan confirms that development proposals should include 'green' roofs and that Boroughs may wish to develop their own green roof

policies. To this end, Core Strategy Policy 7 specifies a preference for Living Roofs (which includes bio-diverse roofs) which in effect, comprise deeper substrates and a more diverse range of planting than plug-planted sedum roofs, providing greater opportunity for bio-diversity.

7.10.15 The application proposes living roofs on Buildings 01, 02 and 03 as well as the new café pavilion. Details have been submitted to demonstrate that the substrate build up can accommodate biodiverse living roof comprising 'London Wildflower Mix'. The existing pitched roofs on Buildings A and C cannot support a living roof as retention of the traditional pitch is required for heritage reasons and the roofs must incorporate a number of rooflights to add natural light to the commercial units. The proposed type and extent of living roofs complies with Policies 5.11 of the London Plan and CSP7 of the LDF and can be secured by condition.

c) Sustainable Urban Drainage Systems

7.10.16 Policy 5.13 of the London Plan requires development to utilise SUDS, unless there are practical reasons for not doing so though supporting text to the policy also recognises the contribution 'green' roofs can make to SUDS. The hierarchy within that policy is for a preference for developments to store water for later use.

7.10.17 The surface water strategy for the site has been developed in conjunction with the Environment Agency and where possible incorporates SUDs features to reduce the impact on the receiving sewers and watercourses. It is proposed to discharge 74% of surface water to the Creek. Where it is necessary to discharge surface water to the public sewer this has been limited to areas of the site which are physically not possible to drain to the Creek other than through pumping. This is the EA's preferred method.

7.10.18 All discharge to the sewer would be suitability attenuated to cater for storm events up to the 1 in 100 year storm event and include a 30% allowance for climate change. The rate at which surface water is discharged to the public sewer would be restricted to meet green field run-off rates therefore reducing the impact on the receiving sewers from that which previously existed.

7.10.19 The living roofs would assist in attenuating and reducing the amount of run-off actually leaving the site;

7.10.20 Areas of landscaping which require irrigation are to be watered using rainwater collected and stored from the roofs of Buildings A and C.

7.10.21 Unfortunately infiltration could not be considered on this site as the contamination assessment has identified areas of contamination for which the EA have expressed concerns could pose a risk to ground water due to leaching. The EA has advised that infiltration is not a suitable method of surface water disposal for the site.

7.10.22 Overall the proposal is considered to be acceptable when judged against sustainability policies.

Ecology

7.11 The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological

conservation interests and soils; minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF addresses ecology in paragraph 109 which states, the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged. Core Strategy Policy 11 seeks to protect the boroughs rivers and waterway network and Core Strategy Policy 12 seeks to protect open space and environmental assets.

- 7.11.1 This site is a Brownfield site but is located adjacent to Deptford Creek and the Creekside Ecology Centre which are protected Sites of Importance for Nature Conservation. The Creek is graded as a Site of Metropolitan Interest. Consequently it is necessary for the applicant to demonstrate that the impact of the proposal on ecology and biodiversity has been fully considered and appropriate mitigation offered where necessary.
- 7.11.2 The ecology of the site has been considered in detail in chapter 14 of the ES as discussed in earlier sections of this report. The ES as originally submitted was not sufficient to fully address the ecological impact of the development. However, following the advice given by the Councils Environmental Consultant in liaison with the Councils Ecologist, the applicant submitted further information to address ecological impact by way of better baseline surveys. Surveys have been undertaken to assess the ecological value of Deptford Creek in terms of flora and fauna and an assessment has been made of the value of the site for bats, birds and other protected or notable species.
- 7.11.3 The ES contends that there are no opportunities for nesting birds or bats on the site and the development would have a negligible effect on foraging bats or birds or wider ecological effect during construction subject to the implementation of a Construction Environmental Management Plan which would control lighting, noise and vibration and untreated surface water run-off into the Creek.
- 7.11.4 In the unlikely event that bats are identified during the building demolition works all works would cease and the applicant would contact Natural England to agree a suitable way forward. Furthermore, if a significant period of time (more than 2 years) were to pass between the planning permission being granted and development commencing the applicant would undertake updated bat surveys.
- 7.11.5 The ES contends that the completed development would not have a significant adverse impact on ecology. Part of the assessment was to consider the overshadowing impact from the development on the Creek and Creekside Centre.
- 7.11.6 The daylight/sunlight assessment shows that there would be an increase in transient overshadowing of the Creek and Creekside Centre. The transient overshadowing of the Creek would occur between 14:00 – 17:00 when the shadows cast would follow the form of the new buildings. However, the dominant habitat within the Creek is mudflats which are currently heavily used for boat moorings on the eastern side. In addition given the existing buildings on site and the steep drop off in levels from the site, it is considered that the mudflat on the western bank of the Creek is already exposed to overshadowing from 14:00

onwards. As such the proposal would have a negligible impact on the Creek in respect of overshadowing.

- 7.11.7 Officers do consider that the overshadowing of the Creekside Centre should be mitigated as this impact, albeit of minor significance in ecological terms could change the way in which this educational resource is used and as discussed elsewhere in this report a contribution towards the centre has been secured as part of the s106 agreement.
- 7.11.8 Appropriate external lighting within the completed development would be controlled to prevent light spillage onto Creek.
- 7.11.9 The ES is considered to address the ecological impact of the development subject to the proposed mitigation measures which would be controlled by condition.
- 7.11.10 In respect of enhancing ecology and biodiversity on site it is considered that an appropriate package of measures has been included as part of the application.
- 7.11.11 The creation of habitats on site would be achieved through the landscaping proposals. The landscape proposal includes a soft landscaped buffer adjacent to the Creek which would be planted with local species associated with Deptford Creek. The applicant initially proposed an extensive area of soft landscaping on the site as an ecological response. However, as discussed in the landscaping section of this report Officers do not consider extensive soft landscaping to be appropriate as this would conflict with the historic character and industrial setting. Consequently it is proposed to reduce the amount of soft landscaping on the eastern edge of the site but where soft landscaping is appropriate local species would be incorporated and the advice given by the Creekside Ecology Centre would inform the landscaping proposals and management plan. Extensive soft landscaping is appropriate for the northern boundary between the buildings on the Faircharm site and the Ecology Centre and a reduced amount would be incorporated along the eastern edge. Officers consider that the soft landscaping of the site together with extensive living roofs would make a valuable contribution to ecology.
- 7.11.12 In addition to the living roofs and soft landscaping it is proposed to incorporate bird and bat boxes within the development. This would be controlled by condition.
- 7.11.13 An additional ecological response is proposed by way of the installation of ecological fenders on part of the Creek wall. A separate planning application was submitted for this ecological feature (DC/13/82645). The application proposed the installation of 8.5 linear metres of ecological fenders covering approximately 45 sqm of the existing sheet piles. Unfortunately the design of the fenders was not considered to be appropriate. The Creekside Education Trust advised that the design could be better enhanced to take account of lessons learnt elsewhere on the Creek to ensure that the fenders offer genuine enhancement in ecological terms.
- 7.11.14 Alternative designs were submitted but these were still not appropriate. The CET has advised that they would be willing to work with the applicant to secure an appropriate design. This could take some time to resolve but can be achieved. The applicant has agreed to engage in future discussions with the CET to secure an appropriate design that would make a significant positive contribution to the ecology of the Creek. In order to take this forward it is proposed to incorporate a

s106 obligation requiring the applicant to develop an appropriate design, method statement and management plan (in liaison with CET). The s106 would require the design to be approved by the local planning authority prior to commencement of development and the fenders to be installed in accordance with the approved details prior to first occupation of the residential units. The applicant has agreed to this approach.

- 7.11.15 Although not extensive in terms of amount, the fenders would make a valuable contribution towards ecology once they have had time to become established. There is an existing section of the Creek wall which has natural timber structures which support habitats so it would not be appropriate to replace these. A request was made to increase the amount of fenders by installing them on the northern section of the Creek wall but the applicant has concluded that this isn't appropriate as this part of the wall may need to be replaced as part of flood defence enhancements.
- 7.11.16 The Environment Agency supports the installation of the fenders as proposed. The applicant would need to obtain a license to undertake works to the flood defence wall.
- 7.11.17 Overall it is considered that the proposal adequately responds to the policy objectives for ecology and biodiversity.

Other Issues

- 7.11.18 Flooding, air quality and land contamination have been addressed as part of the ES assessment discussed in earlier sections of this report.

Planning Obligations

- 7.12 The National Planning Policy Framework (NPPF) states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It further states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. The NPPF also sets out that planning obligations should only be secured when they meet the following three tests:
- (a) Necessary to make the development acceptable
 - (b) Directly related to the development; and
 - (c) Fairly and reasonably related in scale and kind to the development
- 7.12.1 Paragraph 122 of the Community Infrastructure Levy Regulations (April 2010) puts the above three tests on a statutory basis, making it illegal to secure a planning obligation unless it meets the three tests.
- 7.12.2 The applicant has provided a planning obligations statement outlining the obligations that they consider are necessary to mitigate the impacts of the development.

- 7.12.3 London Plan Policy 8.2 (Planning obligations), and Core Strategy Policy 21 (Planning Obligations) together with the Councils Adopted Planning Obligations SPD sets 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 would 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, and as a result of the assessment of the impacts of the proposed development the agreed Heads of Terms for a Section 106 Agreement are set out below.
- 7.12.4 Given that the applicant proposes works to public highways, an agreement or agreements with LB Lewisham under Section 278 of the Highways Act 1980 would also be necessary.

Heads of Terms

Housing

- 21 Affordable units (all affordable rent). Comprising 7 x one bed, 13 x two bed and 1 x three bed;
- Review mechanism for affordable housing provision;
- Affordable units to be built and transferred to a Registered Provider upon occupation of 50% of the private residential units;
- Provision of 15 wheelchair units of which 2 would be affordable and 13 private. All units to be capable of adaption to SELHP...affordable units to be fitted out and private units to be subject to an agreed marketing strategy and fitted out only in response to demand;
- Not to occupy more than 50% of any residential units until the Energy Centre is complete and operational.

Employment Use

- To make available £400, 000 for the Workspace Business Continuity Fund which would comprise £5000 towards each business professional fees for relocation and £1000 towards practical relocation costs. Fund to be made available on date planning permission is granted;
- Any underspend from the £400,000 WBCF to be used to offer business rate relief to new tenants within the Faircharm development.
- To fully refurbish, fit out and make available for occupation the commercial floorspace in Building A prior to occupation of any residential units;
- To fully construct, fit out and make available for occupation the commercial floorspace within Buildings 01, 03 and 04 prior to occupation of any residential unit within Buildings 01, 03 and 04 (on an individual building basis);
- Creekside Artists to be relocated to the Biscuit Factory (another Workspace premises) on the same rent and service charge that they pay at Faircharm whilst development is taking place and then Creekside Artists would be given the opportunity to return to Faircharm on the same rent and service charge for a period of 3 years from their first occupation;

- London Youth Support Trust to be given the opportunity to return to the new Faircharm development on the same rent and service charge that they pay now for a period of 3 years from their first occupation .

Financial Contributions

- £246,258 contribution towards education (nursery/primary/secondary). To be paid on first occupation of the residential development;
- £192,400 contribution towards health. To be paid on first occupation of the residential development;
- £143,750 towards open space (parks and gardens/playing pitches/Childrens play). To be paid on first occupation of the residential development;
- £9,928 towards allotments. To be paid on first occupation of the residential development.
- £50,454 towards employment and training. To be paid on commencement of any part of the development;
- £46,482 towards community facilities (to include the Creekside Ecology Centre). To be paid on commencement of any part of the development;
- £21,594 towards town centre management. To be paid on first occupation of the residential development;
- £10,000 towards tourism. To be paid on first occupation of the residential development;
- £430,000 towards transport and public realm. To be paid on commencement of any part of the development;
- £35,000 towards the consultation and implementation of a future Controlled Parking Zone. To be paid on commencement of any part of the development. Occupiers of the development would be excluded from obtaining permits for the CPZ.
- £100,000 contribution towards Lewisham Business Continuity Fund Proposals. To be paid on commencement of any part of the development.
- Provision of car club facilities within the site together with a membership package for residential and commercial occupiers.

In-kind/other obligations

- Enter into a s278 agreement to undertake improvements to the highway at the entrance to the site;
- Installation of ecological fenders (8.5 linear metres of ecological fenders covering approximately 45 sqm of the existing sheet piles) as part of the redevelopment in accordance with the details to be submitted and agreed prior to commencement of development. The Fenders must be completed prior to occupation of the private residential units;
- In the event that the applicant cannot obtain the necessary permit/license to carry out the Fenders the applicant will pay a contribution of £25,000 to the Council for other ecological mitigation;
- Local labour obligations e.g. use of local labour during construction, working with the Councils Local Labour and Business Coordinator etc..;
- Provision of a real-time public transport board within the foyer of the development;
- The submission of a feasibility study for the movement of materials associated with demolition and construction via the Creek (prior to commencement);
- Submission of a Parking Management Plan (prior to first occupation);

- Submission of Travel Plans for the commercial and residential elements (prior to first occupation);
- Submission of a Public Access and Site Security Management Plan (prior to first occupation);
- Submission of an Ecological Monitoring Plan (prior to first occupation);
- Submission of a condition survey and methodology statement for the full repair and restoration of the existing water tank by a suitable specialist, including a long-term maintenance plan (covering a minimum of 10 years), that would ensure the future preservation of the fabric of the water tanks (within 3 months of commencement)
- Novation of Architect clause to retain KCA architects on the detailed design and to incorporate a local artist with a clause that failure to retain them would generate the payment of a Design Monitoring Contribution (£100,000);
- Reimbursement of the Councils legal, professional and monitoring costs associated with the drafting, finalising and monitoring the agreement.

7.12.5 Officers consider that the obligations outlined above are appropriate and necessary in order to mitigate the impacts of the development and make the development acceptable in planning terms. Officers are satisfied the proposed obligations meet the three legal tests as set out in the Community Infrastructure Levy Regulations.

8 Local Finance Considerations

- 8.1 Under Section 70(2) of the Town and Country Planning Act 1990 (as amended), a local finance consideration means:
- (a) a grant or other financial assistance that has been, or would or could be, provided to a relevant authority by a Minister of the Crown; or
 - (b) sums that a relevant authority has received, or would or could receive, in payment of Community Infrastructure Levy (CIL).
- 8.1.1 The weight to be attached to a local finance consideration remains a matter for the decision maker.
- 8.1.2 The Mayor of London's CIL is therefore a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

9 Viability and Delivery

Viability

- 9.1 The Applicant has submitted a confidential financial appraisal for the scheme that 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.
- 9.1.2 The financial viability assessment has been independently tested in terms of its methodology for assessment. The content has been found to be robust in terms of development opportunity, and viable against a number of land and profit benchmarks. It has been necessary to consider the value of the site in terms of Workspace owning and operating the site and as an investment opportunity. The scheme assumptions and build costs have been tested and consideration has been given to sensitivity tests, s106 and CIL requirements in seeking to ascertain

whether the development is viable and what level of affordable housing can be provided.

- 9.1.3 With regard to a suitable development return, the Councils Consultant has advised that the GLA Toolkit's default allowance of 17% of Gross Residential Development Value (GDV) (c. 20% on Cost) is a reasonable benchmark on private and commercial elements; with Affordable elements at 6% on cost. This is also reflective of the HCA EAT, which identifies the same profit benchmarks for private residential, affordable and commercial elements. However, the Applicant has used a profit on cost of 6%. It is understood that the Applicant regards this development as an enabling development, with the residential income allowing the delivery of the commercial element. Under these circumstances it is not unreasonable to assume a 6% return as reasonable. However, for the purpose of this review the Councils consultant used a return of 17% on GDV (20% on Cost) and 6% on Cost for the affordable elements, and assessed this residual output against a proposed land value benchmark rather than a 6% return against an investment value. It is important to understand the development land value and investment value to understand why the development is a viable option with a 6% profit. However, it also demonstrates that if sold on the open market the residual value would decrease and the anticipated acceptable profit would increase; in effect whilst the scheme would remain viable, no additional affordable housing could be delivered (over 14%) , unless these benchmarks were exceeded.
- 9.1.4 The financial appraisal demonstrates that, when taken with other policy requirements and the regeneration benefits of the scheme, the proposed development provides the maximum viable amount of affordable housing at this time. This is essentially because of the extensive costs of refurbishing the existing buildings (A and C) and providing an extensive Business Continuity Strategy to mitigate the impact of the development on employment within the Borough particularly creative industries in the short and medium term. There are also a range of transport and public realm improvements that would be undertaken to enhance pedestrian and cycle routes to the site. These parts of the scheme require substantial investment but also offer very significant benefits to the recently adopted Conservation Area and regeneration benefits to Lewisham borough.
- 9.1.5 While it is accepted that the provision of a larger proportion of affordable housing is not possible at this time, given the shortfall in affordable housing provision relative to the levels set out in planning policies, it is appropriate that additional affordable housing be kept under review. To this end, a mechanism is to be incorporated as part of the Section 106 to secure a financial contribution towards affordable housing off-site, should values increase to a level where this would be financially viable.

Delivery

- 9.2 The viability appraisal confirms that the proposed development is viable and could be delivered in accordance with the details submitted with this application, at this point in time. It is proposed to deliver this development as one construction phase over a period of approximately 3.5 years. The existing buildings on site would be refurbished first so that these buildings could be occupied before the residential development comes forward for occupation. As discussed above if there is a

delay in the delivery of the project it remains open for the Council to re-consider the affordable housing provision.

- 9.2.1 There are no known land ownership issues that would prevent delivery of the development. The development can still be accommodated with the proposed Thames Tideway Tunnel project albeit that this is a consideration in the detailed construction for the proposal in terms of foundation design and construction logistics.
- 9.2.2 This development would not prejudice the future development of any adjoining sites.
- 9.2.3 There is a requirement for the applicant to obtain a license to construct the ecological fenders onto the Creek wall but there is no known reason why this could not be obtained once an appropriate design for the fenders has been agreed. In the event that it is not legally possible to obtain the necessary licence/consent to install the fenders a clause has been included in the s106 Heads of Terms requiring a financial contribution to be paid to the Council for other ecological enhancements. This contribution would be equal to the cost of providing this necessary in-kind ecological feature on site.
- 9.2.4 Insofar as public realm is integral to the proposals, the scheme offers the prospect of opening up this section of the Creek to the public. This would be secured as part of the s106 agreement.

10 Conclusion

- 10.1 The proposed development of the Faircharm site raises issues relating to the reduction in employment space and introduction of residential development together with matters associated with the nature and scale of the proposed development and its impact on the local environment. This report has considered those matters in the light of adopted and emerging development plan policies and other material considerations including the information set out in the Revised ES.
- 10.2 As discussed in this report the Faircharm Estate is considered to make a significant positive contribution to the Borough. This site together with other developments within Creekside is home to a variety of small businesses which contribute to the established creative hub. The Council would like to support and grow this creative sector.
- 10.3 Creekside is considered to be a unique location due to its long standing commercial use, existing residential developments, social history and relationship to one of the Borough's important water bodies. Commercial occupiers, residents, boat owners and the Creekside Centre form a distinctive community in this part of Deptford that the Council is keen to retain and enhance. Designating the Deptford Creekside Conservation Area was considered to be an essential part of the strategy that the Council would like to take to protect the special character that exists in this area. To complement designation of the conservation area the Council is also in the process of preparing an area specific SPD and conservation area management plan. The purpose of the SPD would be to provide clear and sound planning guidance on how development aspirations for Creekside can be harnessed to retain the areas unique character and its creative industries whilst securing its sustainable future.

- 10.4 There is a strong community presence in this area which is demonstrated in the interest that has been shown in the redevelopment of the Faircharm Estate. The Council is committed to protecting the interests of the community and the effect of the proposed development on existing residents and businesses has been an important part of the consideration of this application. Third party concerns raised in response to this proposal have been properly considered and amendments to the application have been sought where necessary and appropriate, in order to address some of the concerns raised.
- 10.5 However, it is important to recognise that the planning system does have limitations in how it can influence and control market forces. Whilst the planning system can help set a context it cannot over-regulate or seek to manage matters which go beyond the reasonable scope of the planning framework. The planning authority must respond to land owners as ideas are brought forward and must determine applications on the basis of proposals that are submitted. It is important to recognise that there are constraints to what the planning system can reasonably control.
- 10.6 Officers have engaged in extensive discussions with the applicant regarding redevelopment opportunities for the site in order to try and influence the nature of the development proposals that come forward. It is considered that this approach to influencing development proposals is more successful than adopting a do-nothing approach or insisting on a strict policy compliant scheme which in the current market could be difficult to defend. Failure to consider development options could have significant adverse consequences in terms of employment provision and the special character that exists at present.
- 10.7 In physical terms and in its mix of uses, Officers feel that a high quality proposal has been negotiated, but it is recognised that its success will be dependent on how the proposal is executed, the way in which the existing occupiers can be relocated and how new occupiers integrate in the surroundings. It is felt that as far as reasonably possible, within the parameters of the planning framework, an appropriate package of measures has been secured to try and ensure that the benefits of the scheme are delivered and a high quality development executed.
- 10.8 Officers consider that the site analysis and its context is based on an appropriate understanding of the benefits, problems, constraints and opportunities of this part of the borough and an appropriate response to these considerations has been demonstrated within the proposal. Whilst adopted policies designate this site as an employment site which should be retained for commercial use, on balance Officers are satisfied that the material submitted with the application demonstrates a robust case for allowing a mixed use redevelopment of the site, where an appropriate amount of enabling residential development would be used to ensure longevity of employment use. It is considered that the proposal together with the package of s106 mitigation measures represents a genuine employment led redevelopment of the site.
- 10.9 Other site specific issues include: the height, massing and design of buildings and the impact that the development would have on protected views and townscape; the ability of local transport and social infrastructure to cope with the level of change proposed; the accessibility of the scheme; the impact the development would have on the occupiers of surrounding properties and the wider local environment including ecological impact; and the ability to deliver an

environmentally sustainable development. For the reasons set out in this report it is considered that the proposal adequately responds to the aforementioned issues.

- 10.10 In addition to the principle of developing this site for mixed use, the proposal does not comply with policy in terms of the level of affordable housing due to accepted viability constraints and failure to meet BREEAM 'Excellent' for the new build commercial units. However, the proposed development would provide an opportunity to promote long term employment use on the site including the refurbishment and retention of two existing buildings of historic significance together with the provision of much needed housing and an element of affordable accommodation. The proposal would include a significant package of environmental improvements by way of enhanced public routes to the site and access to the Creek. 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 would provide a good standard of accommodation.
- 10.11 The proposals have attracted a significant number of objections from neighbouring properties and businesses within the Faircharm site and adjoining commercial premises on a wide range of issues. Those material concerns expressed by third parties have been considered and addressed in earlier sections of this report, and in provisions set out in the recommended conditions and Section 106 agreement.
- 10.12 Officers consider that, with the recommended mitigation, planning conditions and obligations in place the proposal represents a high quality development that would bring a range of positive benefits to the Borough. As such the development should be approved as an exception to Core Strategy Policy 3, Core Strategy Spatial Policy 2 and the Site Allocations Development Plan Document.

11 RECOMMENDATIONS

- 11.1 The recommendations to the Committee are set out below.
- 11.2 As the proposed development is not in accordance with the provisions of the relevant development plan in terms of land use (Core Strategy Policy 3, Core Strategy Spatial Policy 2 and the Site Allocations Development Plan Document), there is a requirement to refer the application to the Secretary of State under the Town and Country Planning (Consultation) (England) Direction 2009 (paragraph 5). There is also a requirement to refer the application to the Mayor of London.

RECOMMENDATION (A)

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.

RECOMMENDATION (B)

Subject to no direction being received from the Mayor of London, to refer the application to the Secretary of State at the appropriate government office (National Planning Casework Unit) under the Town and Country Planning (Consultation) (England) Direction 2009 (paragraph 5), as a departure from the

development plan in respect of Core Strategy Policy 3, Core Strategy Spatial Policy 2 and the Site Allocations Development Plan Document.

RECOMMENDATION (C)

Subject to no direction being received from the Secretary of State, authorise officers to negotiate and complete a legal agreement under Section 106 of the 1990 Act (and other appropriate powers) to cover the principal matters set out in section 7 of this report, including such other amendments as considered appropriate to ensure the acceptable implementation of the development:

RECOMMENDATION (D)

Subject to completion of a satisfactory legal agreement, authorise the Head of Planning to **GRANT PLANNING PERMISSION** for the reasons set out below and subject to conditions including those set out in section 12 below and such amendments as considered appropriate to ensure the acceptable implementation of the development.

12 Summary of Reasons for Grant of Planning Permission

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

The application was granted for the following reasons:

- (i) The Local Planning Authority has considered the particular circumstances of the application against relevant planning policy set out in The London Plan (2011), Core Strategy (2011) and saved policies in the adopted Unitary Development Plan (July 2004) as well as the National Planning Policy Framework (2012). 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) and all other material considerations including 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:
- (ii) Subject to the mitigation measures secured within the s106 agreement, the mixed use development of the site would bring significant public benefits to the Borough by way of seeking to ensure longevity of employment use on the site and retention and refurbishment of buildings considered to make a valuable contribution to the conservation area. A robust case has been

demonstrated that mixed use redevelopment as presented in this specific application should be approved as an exception to Core Strategy Policy 3: Local Employment Locations, Spatial Policy 2: Regeneration and Growth Areas (Core Strategy 2011) and The Site Allocations Development Plan Document.

- (iii) 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.
- (iv) The proposed demolition to facilitate the redevelopment has been justified in terms of its impact on the conservation area and the proposal is appropriate in its layout, form, height, scale, mass and detailed design. The development adequately addresses its relationship to the Creek and constraints imposed by the Strategic Viewing Corridor and would make a positive contribution in terms of visual and townscape impact in accordance with London Plan Policies design related policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.11, 7.12, 7.24, 7.27, 7.30 and 7.12, Spatial Policy 1, Core Strategy Policy 11, Core Strategy Policy 12, Core Strategy Policy 15, Core Strategy Policy 16, Core Strategy Policy 17 and Core Strategy Policy 18 and Saved Policies in the Unitary Development Plan URB3, URB12 and URB16.
- (v) The provision, layout and design of the residential units is in accordance with London Plan Policies 3.4 and 3.5 which seek to achieve a range of housing choice, Core Strategy Policy 1 and Saved UDP Policy HSG5, which require all new residential development to be attractive, neighbourly and meet the functional requirements of its future inhabitants.
- (vi) The proposed dwelling mix and provision of affordable housing, which is controlled by planning obligations agreed as part 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 Policies 3.11, 3.12, and 3.13 regarding the provision of affordable housing and Core Strategy Policy 1 regarding housing provision, mix and affordability.
- (vii) The provision of new public realm and access to the Creek, secured through planning obligations, is appropriate and complies with London Plan Policy 7.5 which seeks high quality and accessible public realm and Policy 7.27 which seeks to increase the use of the blue ribbon network, Core Strategy Policy HSG15 which encourages high quality public realm as a key part of urban design and Saved UDP Policy URB 12 which requires the inclusion of landscape proposals for all areas not occupied by buildings. Furthermore the proposal adequately addresses ecology and biodiversity in accordance with London Plan Policy 7.19 and Core Strategy Policy 12.
- (viii) The energy and water demand and wider climate change mitigation measures of the proposed development have been assessed in accordance with London Plan Policies which seek to address climate change 5.1, 5.2, 5.3, 5.5, 5.6, 5.7, 5.10, 5.11, 5.12 and 5.13. Although not in strict accordance with Core Strategy Policy 8 regarding Code for

Sustainable Homes and BREEAM the proposal is considered to represent a sustainable form of development.

- (ix) 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 London Plan Policy 6.3 and Core Strategy Policy 14 and the identified highway impacts and proposed mitigation measures secured by planning conditions and obligations, are considered acceptable in accordance with London Plan transport related Policies 6.4, 6.7, 6.9, 6.10, 6.11 and 6.13 and Core Strategy Policy 14 which requires developments to provide an appropriate amount of parking in line with maximum standards, whilst promoting sustainable transport modes and providing, where necessary improvements to public transport and facilities for cyclists and pedestrians.
- (x) 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.
- (xi) The proposed development would not result in material harm to neighbouring properties and as such is in accordance with Saved Policy HSG4: Residential Amenity in the UDP (2004).
- (xii) Consideration has been given to the objections made to the proposed development as part of the application process. It is considered that none of the material objections outweigh the reasons for granting planning permission.

Conditions to be attached to DC/12/82000

The Planning Conditions referred to in Recommendation D are as follows:

Full Planning Permission Time Limit

- (1). The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

Develop in Accordance with Approved Plans

- (2). The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed in the Schedule overleaf.

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

Pre Commencement Conditions

Archaeology

- (3) No development shall commence on site until the developer has secured the implementation of a programme of archaeological work in accordance

with a written scheme of investigation, which has been submitted to and approved in writing by the local planning authority.

Reason: To ensure adequate access for archaeological investigations in compliance with Policies 15 High quality design for Lewisham and 16 Conservation areas, heritage assets and the historic environment of the Core Strategy (June 2011) and Policy 7.8 of the London Plan (July 2011).

- (4) No development shall take place within the application site until the developer has secured the implementation of a programme of archaeological recording of the standing historic building(s), in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure adequate access for archaeological investigations in compliance with Policies 15 High quality design for Lewisham and 16 Conservation areas, heritage assets and the historic environment of the Core Strategy (June 2011) and Policy 7.8 of the London Plan (July 2011).

Construction Environmental Management Plan

- (5) No development shall commence on site until such time as a Construction Environmental Management Plan has been submitted to and approved in writing by the local planning authority. The CEMP should contain (but not be limited to) information reflecting the content of Appendix 6.1 to the Environmental Statement.
- (i) The CEMP shall incorporate a Foundation Works Risk Assessment, which shall properly reflect the ecological sensitivity of Deptford Creek as well as considerations of groundwater protection.
- (ii) The CEMP shall, among other things:
- a. Set appropriate limits on hours of site work.
 - b. Define the hoarding and/or fencing to be erected around the site.
 - c. Define access points and routes for construction traffic.
 - d. Define dust mitigation measures.
 - e. Identify the location and operation of plant and wheel washing facilities
 - f. Provide a Site Waste Management Strategy (to be turned later into a Site Waste Management Plan by the chosen main contractor) including commitments regarding the management of demolition waste.
 - g. Define noise and vibration monitoring positions and the format of noise and vibration reporting (to LB Lewisham).
 - h. Establish commitments regarding site lighting and the control of light 'spill'.
 - i. Establish commitments regarding the secure on-site storage and bunding of fuel and any other hazardous liquids.
 - j. Establish commitments regarding the on-site storage and management of soil and other bulk materials.
 - k. Establish commitments regarding the protection of Deptford Creek from any site-related impacts.
 - l. Detail the measures to be used during the construction in order to minimise environmental impact of the works (considering both

- potential disturbance and pollution) which shall include a map or plan showing habitat areas to be specifically protected (identified in the ecological report) during the works
- m. Details of Security Management (to minimise risks to unauthorised personnel)
 - n. Details of the training of site operatives to follow the CEMP requirements.
 - o. A risk management assessment of any flood events that might occur during the construction phase, registered with the Environment Agency's "Floodline Warning Direct" service
 - p. Establish a process for handling complaints from the public.

The development shall be undertaken in strict accordance with the details approved under (i) and (ii).

Reason: In order to meet the mitigation measures set out in the Environmental Statement and to ensure that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which would minimise possible noise, disturbance and pollution to neighbouring properties including impact on Deptford Creek and to comply with Saved Policies ENV.PRO 9 Potentially Polluting Uses and HSG 4 Residential Amenity in the Unitary Development Plan (July 2004).

Crane Operation

- (6) No development shall commence until full details of a Crane Management Plan has been submitted to and approved in writing by the local planning authority in conjunction with Transport for London.

The development shall be implemented and retained in strict accordance with the approved details.

Reason: To ensure that lifting operations are carried out safely in compliance with BSI standards, and to prevent anything hitting into or falling onto the adjacent railway, compromising the safety of the DLRL network and to comply with London Plan Policy 6.2: Providing public transport capacity and safeguarding land for transport.

Construction Logistics Plan

- (7) No development shall commence on site until a Construction Logistics Management Plan has been submitted to and approved in writing by the local planning authority. The plan shall demonstrate the following:-
- (a) Rationalise travel and traffic routes to and from the site.
 - (b) Detail the proposals for utilising the Creek for transportation of demolition and construction materials
 - (c) Provide full details of the number and time of construction vehicle trips to the site with the intention and aim of reducing the impact of construction vehicle activity and restricting the hours of construction deliveries to avoid the network peak hours of 08:00 – 09:00 and 16:00 – 18:00.
 - (d) Measures to deal with safe pedestrian and cycle movement.

(The measures specified in the approved details shall be implemented prior to commencement of development and shall be adhered to during the period of construction.

Reason: In order to meet the mitigation measures set out in the Environmental Statement and to ensure satisfactory vehicle management and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

Site Contamination

- (8) (a) No development (including demolition of existing buildings and structures) shall commence until each of the following have been complied with:-
- (i) A desk top study and site assessment to survey and characterise the nature and extent of contamination and its effect (whether on or off-site) and a conceptual site model have been submitted to and approved in writing by the local planning authority.
 - (ii) A site investigation report to characterise and risk assess the site which shall include the gas, hydrological and contamination status, specifying rationale; and recommendations for treatment for contamination. encountered (whether by remedial works or not) has been submitted to and approved in writing by the Council.
 - (iii) The required remediation scheme implemented in full.
- (b) If during any works on the site, contamination is encountered which has not previously been identified (“the new contamination”) the Council shall be notified immediately and the terms of paragraph (a), shall apply to the new contamination. No further works shall take place on that part of the site or adjacent areas affected, 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 Council. This shall include verification of all measures, or treatments as required in (Section (a) i & ii) and relevant correspondence (including other regulating authorities and stakeholders involved with the remediation works) to verify compliance requirements, necessary for the remediation of the site have been implemented in full.

The closure report shall include verification details of both the remediation and post-remediation sampling/works, carried out (including waste materials removed from the site); and before placement of any soil/materials is undertaken on site, all imported or reused soil material must conform to current soil quality requirements as agreed by the authority. Inherent to the above, is the provision of any required documentation, certification and monitoring, to facilitate condition requirements.

Reason: To ensure that the local planning authority may be satisfied that potential site contamination is identified and remedied in view of the historical use(s) of the site, which may have included industrial processes and to comply

with Saved Policy ENV.PRO 10 Contaminated Land in the Unitary Development Plan (July 2004).

Piling Operations/Foundations

- (9). (a) No piling or any other foundation designs using penetrative methods shall take place, other than with the prior written approval of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.
- (b) Details of any such operations including a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling would be carried out, including measures to prevent and minimise the potential for damage to the Creek, subsurface sewerage infrastructure, and the programme for the works) must be submitted to and approved in writing by the local planning authority prior to commencement of development
- (c) Any such work shall be carried out only in accordance with the details approved under part (b).

Reason: To prevent pollution of controlled waters and to comply with Saved Policies ENV.PRO 10 Contaminated Land and ENV.PRO 17 Management of the Water Supply in the Unitary Development (July 2004).

Piling Operations/Foundations for Building 04

- (10). No development shall commence in respect of Building 04 (the south eastern building) shown on drawing no. 204_A_P_100_10 Rev E hereby approved, until full details of the design and construction methodology for the foundations have been submitted to and approved in writing by the local planning authority in conjunction with Transport for London.

The development shall be implemented and retained in strict accordance with the approved details.

Reason: To ensure that the proposed works do not compromise the safe and effective operation of the DLRL network and associated structures, due to the proximity of the development to the DLR and to comply with London Plan Policy 6.2: Providing public transport capacity and safeguarding land for transport

Surface Water

- (11) (i) No infiltration or surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters.
- (ii) No development shall commence until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority.

- (iii) The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.
- (iii) The scheme shall seek to eliminate or minimise discharge to the combined sewer and eliminate or minimise pumping of surface water.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, to minimise energy usage and improve habitat and amenity in accordance with Core Strategy Policy 10: Managing and reducing the risk of flooding, Core Strategy Policy 11: River and waterways network and Core Strategy Policy 12: Open space and environmental assets and Saved Policies ENV.PRO 10 Contaminated Land and ENV.PRO 17 Management of the Water Supply in the Unitary Development (July 2004).

Protecting Residential Properties from External Noise

- (12) (i) The residential buildings shall be constructed so as to provide sound insulation against external noise and vibration, to achieve levels not exceeding 30dB LAeq and 45dB LAmax (night) for bedrooms, 35dB LAeq (day) for other habitable rooms, with windows shut and other means of ventilation provided and to meet 55dB LAeq,(day) for balcony areas.
- (ii) Development shall not commence until details of a sound insulation scheme complying with paragraph (i) of this condition and following the mitigation recommendations submitted as part of the Environmental Statement, have been submitted to and approved in writing by the local planning authority.
- (iii) The residential buildings shall not be occupied until the sound insulation scheme approved pursuant to paragraph (ii) of this condition has been implemented in its entirety. Thereafter, the sound insulation scheme shall be maintained in perpetuity.

Reason: To safeguard the amenities of the occupiers of the proposed dwellings and to comply with Saved Policy ENV.PRO 11 Noise Generating Development in the Unitary Development Plan (July 2004).

Soundproofing Mixed Use Buildings or Where Commercial Adjoins Residential

- (13) (a) No development shall commence until full written details, including relevant drawings and specifications of the proposed works of sound insulation against airborne noise to meet $D'_{nT,w} + C_{tr}$ dB of not less than 55 for walls and/or ceilings where residential parties non domestic use shall be submitted to and approved in writing by the local planning authority.
- (b) The development shall only be occupied once the soundproofing works as agreed under part (a) have been implemented in accordance with the approved details.
- (c) The soundproofing shall be retained permanently in accordance with the approved details.

Reason: In the interests of residential amenity and to comply with Saved Policies ENV.PRO 9 Potentially Polluting Uses, ENV.PRO 11 Noise Generating Development and HSG 4 Residential Amenity in the Unitary Development Plan (July 2004).

Fixed Plant Noise Control

- (14) (i) The rating level of the noise emitted from fixed plant on the site shall be 10dB below the existing background level at any time. The noise levels shall be determined at the façade of any noise sensitive property. The measurements and assessments shall be made according to BS4142:1997.
- (ii) Development shall not commence until details of a scheme complying with paragraph (i) of this condition have been submitted to and approved in writing by the local planning authority.
- (iii) The development shall not be occupied until the scheme approved pursuant to paragraph (ii) of this condition has been implemented in its entirety. Thereafter, the scheme shall be maintained in perpetuity

Reason: To safeguard the amenities of the adjoining premises and the area generally and to comply with Saved Policies ENV.PRO 9 Potentially Polluting Uses, ENV.PRO 11 Noise Generating Development and HSG 4 Residential Amenity in the Unitary Development Plan (July 2004)

BREEAM for Non Residential Buildings

- (15) (a) The refurbished and new build commercial units hereby approved shall achieve a minimum BREEAM Rating of 'Very Good'.
- (b) No development shall commence until a Design Stage Certificate for each unit (prepared by a Building Research Establishment qualified Assessor) has been submitted to and approved in writing by the local planning authority to demonstrate compliance with part (a).
- (c) Within 3 months of occupation of any of the commercial units evidence shall be submitted in the form of a Post Construction Certificate (prepared by a Building Research Establishment qualified Assessor) to demonstrate full compliance with part (a) for that specific unit.

Reason: To comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.7 Renewable energy, 5.15 Water use and supplies in the London Plan (2011) and Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011).

Code for Sustainable Homes for New Build Residential Development

- (16) (a) The residential units hereby approved shall achieve a minimum Code for Sustainable Homes Rating Level 4.
- (b) No development shall commence until a Design Stage Certificate for each residential unit (prepared by a Code for Sustainable Homes

qualified Assessor) has been submitted to and approved in writing by the local planning authority to demonstrate compliance with part (a).

- (c) Within 3 months of occupation of any of the residential buildings, evidence shall be submitted in the form of a Post Construction Certificate (prepared by a Code for Sustainable Homes qualified Assessor) to demonstrate full compliance with part (a) for all residential units within that specific building.

Reason: To comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.7 Renewable energy, 5.15 Water use and supplies in the London Plan (2011) and Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011).

Future Connection to a District Combined Cooling, Heat and Power or Combined Heat and Power Scheme

- (17) (a) No development shall commence until written information, drawings and sections showing a scheme for the provision of conduits and/or piping for future connection to a District Combined Cooling, Heat and Power (CCHP) or Combined Heat and Power Scheme CHP Scheme and Network have been submitted to and approved in writing by the local planning authority.
- (b) No part of the development shall be occupied until the scheme has been carried out in accordance with the approved details.

Reason: To enable future connection to a District CHP should it become feasible as set out in the applicants Energy Strategy and to comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.5 Decentralised energy networks and 5.7 Renewable energy in the London Plan (2011) and Core Strategy Policy 7 Climate change and adapting to the effects and Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011).

Site Wide CHP Details

- (18) (a) No development shall commence until details of the proposed heat networks and Combined Heat and Power (CHP) system set out in the applicant's Revised Energy Strategy and Revised Sustainability Statement have been submitted to and approved in writing by the local planning authority.
- (b) The details shall include the commissioning of the networks and CHP system and details of the catalytic converter if required.
- (c) The networks and systems shall be provided in accordance with the approved details and maintained thereafter.

Reason: To comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.5 Decentralised energy networks and 5.7 Renewable energy in the London Plan (2011) and Core Strategy Policy 7 Climate change and adapting to the effects and

Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011).

Materials/Design Quality

- (19) No development shall commence on site until a detailed schedule and samples of all external materials and finishes for the existing and proposed new buildings (reflecting the principles set out in the plans and materials document hereby approved) have been submitted to and approved in writing by the local planning authority. The details shall include:
- Samples of all facing materials (including brick panel samples to be constructed onsite);
 - Samples of roof covering for Buildings A and C including the roof for the covered courtyard;
 - Details of all fenestration (including any replacement/new fenestration in Buildings A and C);
 - 1:10 elevation and section drawings for steel framed doors (identified as No.5 and No.37 on the materials index);
 - Details of all external door furniture;
 - Details of the location and type/finish of any entry system for each of the buildings;
 - Details of rooflights for Buildings A and C;
 - Details of roof mounted extract vents;
 - Details of all rainwater goods;
 - Samples of all balustrading/metal panels for all external walkways, the bridge, stairs and Juliet balconies

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

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the building(s) and to comply with Policy 15 High quality design for Lewisham and Policy 16: Conservation areas, heritage assets and the historic environment of the Core Strategy (June 2011) and Saved Policy URB 3 Urban Design in the Unitary Development Plan (July 2004).

Matching Brickwork

- (20) (i) All brickwork infill to existing openings (referred to as No. 3 on the material index) and brick repair (referred to as No. 1 on the material index) for Buildings A and C shall be in matching brick, matching size, colour and texture of the original brick, bonding type, mortar and type of pointing.
- (ii) Prior to commencement of development a panel shall be provided on site showing compliance with (i).

The development shall be undertaken in strict accordance with the details approved.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the building(s) and to comply with Policy 15 High quality design for Lewisham and Policy 16: Conservation areas, heritage assets and the

historic environment of the Core Strategy (June 2011) and Saved Policy URB 3 Urban Design in the Unitary Development Plan (July 2004).

Boundary Treatment for Café Terrace

(21) Notwithstanding the approved plans full details of the boundary treatment to Creekside (in front the of the café terrace) including details of height of the wall and specific material shall be submitted to and approved in writing by the local planning authority prior to commencement of development.

The boundary treatment shall be installed in full accordance with the details approved before the café is brought into use.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the terrace and its relationship to the streetscene and to comply with Policy 15: High quality design for Lewisham and Policy 16: Conservation areas, heritage assets and the historic environment of the Core Strategy (June 2011) and Saved Policy URB 3 Urban Design in the Unitary Development Plan (July 2004).

Refuse Storage (major sites)

(22) The on-site facilities for storage and disposal of refuse and recycling for each building, as set out in the plans and documents hereby approved, shall be carried out in full prior to occupation of each buildings within the development and retained thereafter.

Reason: In order that the local planning authority may be satisfied with the provisions for recycling facilities and refuse disposal, storage and collection, in the interest of safeguarding the amenities of neighbouring occupiers and the area in general, in compliance with Policies URB 3 Urban Design and HSG4 Residential Amenity in the Unitary Development Plan (July 2004) and Core Strategy Policy 13 Addressing Lewisham waste management requirements (2011).

Cycle Parking Provision

- (23) (a) A minimum of 210 cycle parking spaces which shall include 34 allocated for commercial use and 176 for residents, shall be provided within the development as indicated on the plans hereby approved.
- (b) No development shall commence on site until the full details of the external cycle parking facilities have been submitted to and approved in writing by the local planning authority.
- (c) All commercial cycle parking spaces shall be provided and made available for use prior to occupation of the commercial units and maintained thereafter; and
- (d) All residential cycle parking spaces shall be provided and made available for use prior to occupation of the residential units and maintained thereafter.

Reason: In order to ensure adequate provision for cycle parking and to comply with Policy 14: Sustainable movement and transport of the Core Strategy (2011).

Landscaping Details

- (24) No development shall commence on site until drawings and full details of the proposed landscaping have been submitted to and approved in writing by the local planning authority. The landscaping details shall include:
- (i) Hard and soft landscaping treatment for any part of the site not occupied by buildings (including details of the permeability of hard surfaces)
 - (ii) Details of any street furniture, ancillary structures and natural play equipment (which shall include 170sqm of natural play equipment for 0-5 yrs)
 - (iii) Details of the proposed viewing platform
 - (iv) Details of an interpretation ecological board
 - (v) Details of boundary treatments which shall include retention of the historic boundary treatment on the north boundary
 - (vi) A scheme of soft landscaping (including details of any trees or hedges to be retained and proposed plant numbers, species, location and size of trees and tree pits)
 - (vii) Details of the number, location and design of bird and bats boxes to be incorporated as part of the landscaping proposals
 - (viii) Details of the management and maintenance of the landscaping for a period of five years
- a. All hard landscaping works and boundary treatments which form part of the approved scheme under part (a) shall be completed prior to occupation of any part of the residential development.
 - b. All planting, seeding or turning shall be carried out in the first planting and seeding seasons following the completion of the development, in accordance with the approved scheme under part (a). Any trees or plants which within a period of five 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.
 - c. All street furniture, ancillary structures, natural play equipment and bird and bat boxes which form part of the approved scheme under part (a) shall be installed at the same time as the soft landscaping and by no later than the end of the first planting and seeding seasons following the completion of the development.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Core Strategy Policy 12 Open space and environmental assets, Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Saved Policies URB 3 Urban Design, URB 12 Landscape and Development and URB 13 Trees in the Unitary Development Plan (July 2004).

Prior to Above Ground Works Conditions

Electric Vehicle Charging Points

- (25) (a) A minimum of 20% of the car parking spaces hereby approved shall be fitted with electric vehicle charging points. Details of the location of

electric vehicle charging points to be provided and a programme for their installation and maintenance shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.

- (b) The electric vehicle charging points as approved shall be installed prior to occupation of any of the residential units and shall thereafter be retained and maintained in accordance with the details approved under (a).

Reason: To promote sustainable modes of transport and reduce pollution emissions in an Area Quality Management Area in accordance with Policy 7.14 Improving air quality in the London Plan (July 2011) and Core Strategy Policy 14: Sustainable movement and transport.

Prior to Occupation Conditions

Energy Centre Emissions

- (26) Prior to occupation of Building 04 full details shall be submitted to and agreed in writing by the local planning authority in respect of noise and gaseous emissions associated with the ground floor energy centre and its associated stack, which should discharge gaseous emissions from the top of Building 04.

The development shall be implemented and retained in full accordance with the details approved.

Reason: In the interests of protecting residential amenity in accordance with Saved Policy HSG4: Residential Amenity of the Unitary Development Plan (2004).

Living Roofs

- (27) (a) The café pavilion and Buildings 01, 02 and 03 hereby approved shall be constructed with biodiverse living roofs laid out in accordance with drawing no. 204_A_P_100_14 Rev D and the supporting documents hereby approved, and maintained thereafter.
- (b) The living roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.
- (c) Prior to occupation of each of the buildings hereby approved, evidence to show that the living roof for each building has been installed in accordance with (a) shall be submitted to and approved in writing by the local planning authority.

Reason: To comply with Policies 5.10 Urban greening, 5.11 Green roofs and development site environs, 5.12 Flood risk management, 5.13 Sustainable Drainage and 7.19 Biodiversity and access to nature conservation in the London Plan (2011) and Core Strategy Policy 10 Managing and reducing flood risk and Core Strategy Policy 12 Open space and environmental assets.

External Lighting

- (28) (a) Prior to occupation of any part of the development a scheme for any external lighting that is to be installed at the site, including measures

to prevent light spillage shall be submitted to and approved in writing by the local planning authority.

- (29) Any such external lighting as approved under part (a) shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.
- (a) The applicant should demonstrate that the proposed lighting is the minimum needed for security and working purposes, that the lighting is appropriate in relation to the ecology of the Creek and Creekside Centre, the lighting shall not shine directly onto DLRL's railway tracks. and that the proposals minimise pollution from glare and spillage and any external lighting for the development required for construction or operational purposes

Reason: In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which would minimise possible light pollution to the night sky and neighbouring properties and that any lighting installed would not adversely affect the ecology of the Creek and Creekside Centre to comply with Core Strategy Policy 12 Open Space and Environmental Assets and Saved Policies ENV.PRO 12 Light Generating Development and HSG 4 Residential Amenity in the Unitary Development Plan (July 2004).

Delivery and Servicing Plan

- (30) No part of the development shall be occupied until a Delivery and Servicing Plan has been submitted to and approved in writing by the local planning authority.

The plan shall demonstrate:

- (i) the expected number and time of delivery and servicing trips to the site, with the aim of reducing the impact of servicing activity;
- (ii) the internal access road shall be a one-way operation with access into the site for all vehicles from the central access and egress from the northern access only;
- (iii) Entry into the site would be strictly controlled and managed by an on-site management company who would be required to implement the DSP; and
- (iv) The refuse collection points would be located within the development in accordance with the plans hereby approved.

The approved Delivery and Servicing Plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to in perpetuity.

Reason: In order to ensure satisfactory vehicle management and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

Conditions which do not require details to be submitted **Construction Deliveries and Hours**

- (31) No construction work shall take place on the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

Reason: In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Saved Policies ENV.PRO 9 Potentially Polluting Uses, ENV.PRO 11 Noise Generating Development and HSG 4 Residential Amenity in the Unitary Development Plan (July 2004).

Renewable Energy

- (32) The development shall provide a minimum of 133 sqm of photovoltaic panels on the roof of Building 04 in accordance with the details set out in the Energy Strategy hereby approved.

The panels shall be provided prior to occupation of Building 04 and retained in perpetuity.

Reason: To ensure that appropriate provision of renewable energy would be utilised as part of the carbon emission savings on site as set out in the applicants Energy Strategy and to comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction and 5.7 Renewable energy in the London Plan (2011) and Core Strategy Policy 7 Climate change and adapting to the effects and Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011)

DLR Access

- (33) Access for emergency services and DLR maintenance vehicles to and from the DLR viaduct structure must remain available at all times through the construction period and in the completed state.

Reason: To ensure that there is unobstructed access to the DLRL network for emergency services and maintenance works in accordance with London Plan Policy 6.2: Providing public transport capacity and safeguarding land for transport

Lifetime Homes

- (34) Each of the dwellings hereby approved shall meet Lifetime Home Standards (in accordance with the 2010 (Revised) document) as far as practically possible and in accordance with the details contained within the application plans and documents hereby approved.

Reason: In order to ensure an adequate supply of accessible housing in the Borough in accordance with Saved Policy HSG 5 Layout and Design of New Residential Development in the Unitary Development Plan (July 2004) and Core Strategy Policy 1 Housing provision, mix and affordability and Core Strategy Policy 15 High quality design for Lewisham (June 2011).

Wheelchair Homes

- (35) The 15 wheelchair dwellings hereby approved shall be constructed in full accordance with the SELHP Wheelchair Homes Design Guidelines (October 2011) as shown in the 'Design and Access Statement Addendum' hereby approved prior to their first occupation.

For the avoidance of doubt a parking space should be provided for each wheelchair unit and where a communal access is to be the principle access for wheelchair users or relates to communal access to amenity space or facilities intended for the enjoyment of residents of the development the specification for the said communal access shall not be less than the specification for access for wheelchair units under the SELHP Wheelchair Homes Design Guidelines.

Reason: To ensure that there is an adequate supply of wheelchair accessible housing in the Borough in accordance with Saved Policy HSG 5 Layout and Design of New Residential Development in the Unitary Development Plan (July 2004) and Core Strategy Policy 1 Housing provision, mix and affordability and Core Strategy Policy 15 High quality design for Lewisham (June 2011).

Satellite Dishes

(36) Notwithstanding the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking, re-enacting or modifying that Order), no satellite dishes shall be installed on the roof or elevations of Buildings 01, 02, 03 and 04 hereby approved without prior written approval first being obtained.

Reason: In order that the local planning authority may be satisfied with the details of the proposal and to accord with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Saved Policy URB 3 Urban Design in the Unitary Development Plan (July 2004).

Enclosures

(37) Notwithstanding the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking, re-enacting or modifying that Order), no gate, fence, wall or other means of enclosure shall be erected without prior written approval first being obtained.

Reason: In order that the local planning authority may be satisfied with the details of any form of enclosure in the interest of visual and residential amenity and to ensure adequate public access is retained and to accord with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Saved Policies URB 3 Urban Design and HSG4 Residential Amenity in the Unitary Development Plan (July 2004).

Plumbing or Pipes

(38) Notwithstanding the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking, re-enacting or modifying that Order), no plumbing or pipes, other than rainwater pipes, shall be fixed on the external elevations of Buildings A and C, 01, 02, 03 and 04 hereby approved.

Reason: It is considered that such plumbing or pipes would seriously detract from the appearance of the building(s) and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Saved Policy URB 3 Urban Design in the Unitary Development Plan (July 2004).

Provision of Parking Spaces (Residential)

(39) (i) The whole of the car parking accommodation shown on the plans hereby approved which shall include a total of 28 space of which 16 shall

be accessible spaces and 1 shall be a car club space, shall be provided prior to the occupation of any part of the development and retained permanently thereafter.

- (ii) The car club space shall only be used for parking cars associated with the Car Club.

Reason: To ensure the permanent retention of the spaces for parking purposes as identified in the application hereby approved and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011) and Table 6.1 of the London Plan (July 2011).

Loading and Unloading

- (40) Loading and unloading of goods shall only be carried out within the servicing areas shown on the drawing no.204_A_P_100_10 Rev E hereby approved and all servicing areas shall be left unobstructed at all times.

Reason: To avoid obstruction of neighbouring streets and to safeguard the amenities of adjacent premises in the interests of public safety and to comply with the Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

Restrict Use Class

- (41) Notwithstanding the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking, re-enacting or modifying that Order), all of the commercial units hereby approved within Buildings C, 01, 03 and 04 shall only be used for purposes falling within Use Class B1 and for no other purpose (including any other purpose in Use Class B8) of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order).

Reason: In order to protect the employment units for uses falling within B1 Use Class in the interests of retaining the maximum amount of employment provision possible on the site, to reflect the policy designation of the site as an employment location in accordance with Core Strategy Policy 3: Strategic Industrial Locations and Local Employment Locations.

- (42) Notwithstanding the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking, re-enacting or modifying that Order), the commercial units hereby approved within Building A shall only be used for purposes falling within Use Class B1 and B2, as set out in the plans hereby approved; and for no other purpose (including any other purpose in Use Class B8) of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order).

Reason: In order to protect the employment units for uses falling within B1/B2 Use Class in the interests of retaining the maximum amount of employment provision possible on the site, to reflect the policy designation of the site as an employment location in accordance with Core Strategy Policy 3: Strategic Industrial Locations and Local Employment Locations.

INFORMATIVES TO BE ATTACHED TO DC/12/82000

1. Positive and Proactive Statement

The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Councils website. On this particular application extensive pre-application discussions took place and the application was also amended as a result of the assessment and issues raised by third parties.

2. Commencement of Development

The applicant is advised that any works associated with the implementation of this permission (including the demolition of any existing buildings or structures) would constitute commencement of development. Further, all pre commencement conditions attached to this permission must be discharged, by way of a written approval in the form of an application to the Planning Authority, before any such works of demolition take place.

3. Site Contamination

The land contamination condition requirements apply to both whole site and phased developments. Where development is phased, no unit within a phase shall be occupied until a), b) and c) of the condition have been satisfied for that phase.

Applicants are advised to read 'Contaminated Land Guide for Developers'(London Borough's Publication 2003), on the Lewisham web page, before complying with the above condition. All of the above must be conducted in accordance with DEFRA and the Environment Agency's (EA) - Model Procedures for the Management of Land Contamination.

Applicants should also 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.

4. Construction

You are advised that all construction work should be undertaken in accordance with the "London Borough of Lewisham Code of Practice for Control of Pollution and Noise from Demolition and Construction Sites" available from the Environmental Health Office, 2nd Floor Laurence House, 1 Catford Road, Catford, London SE6 4RUTel No. 020 8314 6789.

5. Drainage

You are advised to contact the Councils Drainage Design team on 020 8314 2036 prior to the commencement of work.

6. Dust Minimisation

In preparing the scheme of dust minimisation for the CEMP, reference shall be made to the London Councils Best Practice Guide: The Control of Dust and Emissions from Construction and Demolition. All mitigation measures listed in the Guide appropriate to the size, scale and nature of the development would need to be included in the dust minimisation scheme.

7. Street Naming & Numbering

The applicant be advised that the implementation of the proposal would require approval by the Council of a Street naming & Numbering application. Application forms are available on the Councils web site.

8. Fixed Plant and Operational Noise Control

Assessment of the sound insulation scheme should be carried out by a suitably qualified acoustic consultant.

9. Soundproofing from External Noise

Assessment of the sound insulation scheme should be carried out by a suitably qualified acoustic consultant, and should be guided by current standards and comply with the criteria given in the current BS6472 for evaluation of human exposure to vibration in buildings.

10. Soundproofing Mixed Use Buildings or Where Commercial Adjoins Residential

The weighted standardised level difference ($D_{nT,W} + C_{tr}$) is quoted according to the relevant part of the BS EN ISO 717 series. To guarantee achieving this level of sound insulation, the applicant is advised to employ a reputable noise consultant. The Institute of Acoustics is the professional body for such consultants and can be contacted by telephone 01727 850553.

11. River Works License

The applicant is advised that they would need a River Works Licence from the PLA for the proposed fenders. They are advised to contact Briana Hunter on 01474 562354 to discuss this matter further

12. Archaeology

The historic buildings are of intrinsic archaeological interest and any alteration or demolition of the historic structure(s) should be recorded before they are damaged or destroyed by the development hereby permitted.

The development of this site is likely to damage archaeological remains. The applicant should therefore submit detailed proposals in the form of an archaeological project design. The design should be in accordance with appropriate English Heritage guidelines.

13. Surface Water

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit would be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined

public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services would be required. They can be contacted on 0845 850 2777.

14. Water Provision

Thames Water would aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

15. Piling

The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

16. Protection of the DLR

Appropriate uses of the land under a DLR structure include hard landscaping and vegetation in movable boxes. Further details can be obtained from dlrdevelopmentconsultations@dlr.tfl.gov.uk

17. Use of Cranes

BSI standards and publications specify requirements for health and safety in the building industry. The misuse of cranes through lack of knowledge and understanding of hazards and safe working procedures is a major cause of accidents. BSI standards and publications help to minimise risks and meet essential health and safety requirements.

It is advised that the attention of crane operators be brought to the British Standard Code of Practice for the safe use of cranes, British Standard Institute 7121: Part I: 1989 (as amended).

18. Satellite Dishes

The applicant is advised that satellite television for the residential development should take the form of communal facilities which would require planning permission.

RECOMMENDATION (E)

In respect of Conservation Area Consent (DC/13/83250): authorise the Head of Planning to GRANT PERMISSION subject to the following Condition:

- (a) Demolition of any of the existing buildings shall not proceed until the local planning authority confirms in writing that it is satisfied that the following steps have been taken:-
- (b) A contract has been entered into for the implementation of the development on the application land for which planning permission has been granted. Such demolition shall only be that which is necessary for carrying out the contract; and
- (c) All relevant details required under the planning permission have been submitted and approved in writing.

Reason: The local planning authority wishes to ensure that no demolition takes place other than that required to implement part or all of any development, in the interests of protecting the character and appearance of the Conservation Area and to comply with Policies 15 High quality design for Lewisham and 16 Conservation areas, heritage assets and the historic environment of the adopted Core Strategy (June 2011).

Summary of Reasons for Grant of Conservation Area Consent

The Local Planning Authority has considered the particular circumstances of the application against relevant planning policy set out in The London Plan (2011), Core Strategy (2011) and saved policies in the adopted Unitary Development Plan (July 2004) as well as the National Planning Policy Framework (2012) and all relevant material considerations, including comments received in response to third party consultation. The Local Planning Authority has considered the impact that the development would have upon the character and appearance of the conservation area and considers that the demolition of the buildings within the conservation area is acceptable, as the benefits of the proposal are considered to outweigh the harm caused to the conservation area.

Appendix A – Local Meeting Notes

Local Meeting Notes – Faircharm Estate DC/12/82000 (12th February 2013)

Present

JR Joan Ruddock MP – Chair

GB Gemma Barnes LBL

CB Chris Brodie LBL

Workspace - Ian Dubber (ID), Rebecca Paczek

KCA – Karen, Paul, Ines,

Steer Davies Gleave – Rob

R Residents - 26

7:00pm – Joan opened the meeting with introductions and explained the purpose of the local meeting. It was stated that previous objections submitted would be taken into account so shouldn't be repeated but additional comments sheets are available.

ID - Explained Workspace have been looking at redevelopment options since 2008. He briefly outlined the proposal and mentioned consultation undertaken with occupiers since 2011.

JR – The main issues raised so far by third parties appear to be:-

Uses; Phasing; Built form; Transport; Use of Creek

We should therefore try to discuss these issues in the meeting. Other issues can also be discussed.

R – Why were the questionnaires sent over the Christmas and New Year period?

R – Why weren't occupiers kept informed?

R – Why didn't some residents get the letters sent by the Council?

ID – All occupiers were consulted via email (bcc). This method was used for data protection reasons.

CB – The application came in shortly before Christmas, the Council cannot control when an application is submitted but we do allow extra time for comments over holidays periods. The Council accept comments up until the decision is made but for comments to be properly considered they should be received early.

LBL wrote to over 700 people and put various site notices up. The Council try not to exclude people and make a concerted effort to consult as many people that would be affected by the proposal as possible for example the Council went to great lengths to notify boat occupiers.

R – When would the decision be made?

GB – Anticipated that the application could be reported to the Planning Committee in May 2013 but this isn't set yet as the application is still being negotiated. Everyone who has written in about the application would be notified of the committee and given the opportunity to attend the committee.

R – When did Workspace make the decision to change from Use Class B1 to B2?

R – What demand is there for small units in this area?

R – How does the proposal respond to economic situation/how many units in Faircharm are vacant?

R – What does B Use Class mean?

CB – B1 is office and light industrial that doesn't give rise to nuisance. B2 uses can give rise to noise and smell. B1 can coexist with residential but B2 can be more tricky. We would be cautious about allowing B2 next to residential but there can be a way of dealing with the disturbance. We can look at ways to deal with noise and smell nuisance.

R – Can extraction be fitted in the new build? This would be expensive.

ID – History of the site is general industrial but more recently the planning permission allows for mixed B1/B2.

Other Workspace sites operate on open B1 Uses. This allows for a range of uses.

LBL have asked Workspace to explore whether some B2 use can be accommodated on the site. Workspace are looking at this, perhaps in existing buildings.

R – How much B2 use?

ID – Looking at 400 sqm. It is assumed that B2 space would be in the existing buildings, this is best for access arrangements.

ID – Workspace know that there is a demand for small/medium sized business space in this area. Workspace currently has 4500 tenants, 30% turnover. The business model suggests there is a demand.

ID - Cant answer why other units in the area aren't occupied.

R – If there is a good commercial market why develop residential?

ID – Current buildings have low rent but high service charge. The buildings need investment. Residential development is needed to pay for reinvestment in the existing buildings.

ID – At the moment the site is 62% occupied, 38% vacant. The current proposal is trying to create better units in terms of size, natural light and ventilation and more flexibility because big units can be subdivided where necessary.

R – The reason there is a high vacancy rate is because there is uncertainty about lease arrangements.

R – How much would a 100sqft unit cost?

R – 400sqm B2 use would not be sufficient.

JR – Can Chris answer in planning terms whether anything can be done to help existing occupiers?

CB – The Councils view it that we should try and encourage investment but we would like to find ways to help existing businesses. This can be difficult to control in planning terms but we continue to ask questions about this. LBL are fully aware that retention of existing buildings/occupiers is important for successful place making. We are committed to addressing this where we can.

ID – Workspace are trying to address this. They have identified a Business Continuity Fund, appointed Kalmars to look at relocation options. Also looking at whether some businesses can be retained during construction but this is a difficult issue to sort out in practice.

R – No-one knew that there was a possibility to stay on site during construction.

ID – This is an ongoing discussion, still to be explored.

ID – 100 sqft rent would be between £8.50 - £12.50 plus service charge. Average rent at the moment is £7 and service charge £3.75. Workspace think that rent would increase but service charge would drop.

JR - Can Workspace offer 20,000 sqft to 'Based Upon' elsewhere?

ID – There is limited space for this size of unit in the Workspace portfolio but options have been explored. Alternative accommodation has not been secured at this time.

JR – It is understood that the Workspace model is based upon buying big units and redeveloping them as small units. Could Ian continue to work with the Council to ensure the best redevelopment is achieved?

R – There have only been 2 exhibitions with existing businesses.

R – Did the architects look at commercial redevelopment options that didn't involve residential?

ID – An exercise was undertaken to look at various redevelopment options.

ID – Workspace are currently looking at phasing options but this needs more exploration.

ID – Existing tenants have secured agreements until July 2013. After this it could be rolling contracts on a monthly basis.

R – Can use of the Creek contribute to phasing discussions as the Creek can be used for demolition and construction materials,

ID – Workspace would consider this.

JR – Would the Council control use of the Creek for transportation of building materials?

CB – Planning policy supports such usage, we would encourage this. Needs to be explored with the applicant and PLA.

R – Would people be re-consulted if phasing information is submitted?

GB – This is a judgement to be made by LBL but significant revisions do lead to a re-consultation.

CB/GB – When we agree measures as part of the application we can control it via s106 and conditions. But we need to encourage Workspace to put forward measures for use of the Creek and to deal with existing businesses as we can't necessarily compel them to do this.

JR – Are there any objections to the form of the development?

R – The design isn't sympathetic to the conservation area.

ID – Workspace have entered into detailed discussion with the Councils Design Team regarding refurbishment of the existing building and design of the new buildings. Design is subjective.

R – Proposed height isn't appropriate for the area.

ID – Workspace believe that there is an opportunity for a taller building on this site. There are other tall buildings in the vicinity.

R – Crossfields residents would lose at least an hour of sunrise each day.

ID – Explained how you assess sunlight/daylight and showed studies undertaken.

JR – There would be some impact on daylight/sunlight. Can this be articulated to the audience?

ID – The impact would not be significant.

R – Why has a decision been made that Building B isn't as important as Buildings A and C.

CB – LBL are proud of the Conservation Area designation. Part of the assessment did identify that Building B was not deemed to be as historically significant as other buildings on the site. We have a team of Conservation Officers that research the historic significance of buildings in the Borough.

R – Could the Planning Committee request retention of Building B?

GB – The Council need to determine the application on the basis submitted which can be negotiated but ultimately we have to make a decision on the proposal to demolish Building B. LBL could choose to refuse planning permission if the current proposal is thought to be unacceptable.

R – How much commercial space would be provided on the site?

JR – Can planners explain how the planning process would work?

CB – Explained the planning process which is that LBL encourage Pre application discussions. When an application is submitted we consult people. Planners assess the application with the assistance of expert consultants. The consultation process is part of the assessment. This meeting is part of the assessment. If we receive substantive

revisions we re-consult. Eventually we write a comprehensive report and refer the application to the Planning Committee.

If the application is approved it would be subject to conditions which seek to secure necessary measures.

R – Would there be a s106 to mitigate the impact of the development?

CB – Yes we would be expecting a contribution to affordable housing, transport, enhancements to the Creek amongst other matters.

R – Can money be secured to improve pedestrian routes to Deptford DLR station?

R – Is the level of parking sufficient?

R – How would construction affect residents?

ID – An Environmental Impact Assessment has been undertaken, this looks at impact on a range of issues such as transport/ecology/noise/air quality etc This is being assessed by LBL.

There is a Transport Assessment and Transport Impact Assessment submitted as part of the application.

Construction traffic – 180 trips per day. Current trips from the site assessed to be 290.

Construction parking based on maximum London Plan standards. PTAL rating is 4a.

Proposed 28 spaces to be divided between commercial and residential. Workspace models show that lots of employees cycle/walk to work. Its is not unusual for residential development to be car-free in London. There would be a hire-car facility on site

Transport Assessment looks at cumulative impact of other schemes.

R – How many residential units and how many affordable units?

ID – 15% affordable units proposed.

ID – Workspace have been looking at improvements to pedestrian routes. This would form part of the s106 mitigation. This is an ongoing discussion.

Deptford Church Street is a TfL route.

R – How would construction traffic be managed?

ID – Workspace would be tied into a Construction Management Plan if planning permission is granted.

R – It feels as if the Council and the Developer are against the community.

JR – The Council is committed to taking into account the views of the community.

20:45pm – Joan closed the meeting.