

Committee	STRATEGIC PLANNING COMMITTEE	
Report Title	LEWISHAM GATEWAY, LEWISHAM HIGH STREET, LONDON, SE13	
Ward	Lewisham Central / Blackheath	
Contributors	Gareth Clegg	
Class	PART 1	14 FEBRUARY 2019

Reg. Nos. (A) DC/18/109819

Application dated 29.11.2018

Applicant Richard Hesketh, Quod on behalf of Lewisham Gateway Developments Ltd

Proposal Approval of Reserved Matters for Blocks C (part 3/10/12 storeys), D1 (16-19 storeys), D2 (30 storeys) and E (4 storeys) to provide a total of 530 residential units (comprising 16 studio units, 238 one-bedroom units, 271 two-bedroom units and 5 three-bedroom units), 6,308m² (GEA) of co-living floorspace (comprising 119 co-living units and communal facilities (Use Class sui generis)), 4,381m² (GEA) of retail/restaurant/cafe, floorspace (Use Class A1 and/or A3), 1,525m² (GEA) of co-working floorspace (Use Class B1), a cinema, (2,472m² GEA) and gym (1,606m² GEA) (Use Class D2), and associated hard and soft landscaping works, pursuant to condition 2, relating to layout, scale, appearance and landscaping for the comprehensive mixed use redevelopment of the outline approval DC/18/105218 (granted on 29 November 2018) under Section 73 of the Town & Country Planning Act 1990 as a Minor Material Amendment in connection with the planning permission DC/06/62375 (granted on 8 May 2009) for the comprehensive mixed use redevelopment of the Lewisham Gateway Site, SE13 (land between Rennell Street and Lewisham Railway Station) for up to 100,000m² comprising retail (A1, A2, A3, A4 and A5), offices (B1), hotel (C1), residential (C3), education/health (D1) and leisure (D2) with parking and associated infrastructure, as well as open space and water features.

Applicant's Plan Nos. Received 22 November 2018

AA5575-1150, AA5575-1151, AA5575-1152, 2.005 Rev A Site Elevations – North Elevation, 2.005 Rev A Site Elevations – West Elevation, AA5575-1200, AA5575-1201, AA5575-1202,

AA5575-1203, AA5575-1205, AA5575-1206,
AA5575-1207, AA5575-1208, AA5575-1209,
AA5575-1210, AA5575-1211, AA5575-1212,
AA5575-1600, AA5575-1601, AA5575-1602,
AA5575-1603, AA5575-1604, AA5575-1610,
AA5575-1611, AA5575-1612, AA5575-1613,
AA5575-1614, AA5575-1615, AA5575-1616,
AA5575-1617, AA5575-1618, AA5575-1619,
AA5575-1650, AA5575-1700, AA5575-1701,
AA5575-1702, 2.001 Rev B - Block C Full
Elevations Set, 2.101 Rev A - Block C North
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2.103 Rev A - Block C South Elevation, 2.104
Block C West Elevation, C-5.201 Rev A - Block
C Elevation and Section Fragment Podium, C-
5.202 Rev A - Block C Elevation Section
Fragment Roof, C-5.203 Rev A - Block C
Elevation Section Fragment Central, AA5575-
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1303, AA5575-1304, AA5575-1305, AA5575-
1306, AA5575-1307, AA5575-1308, AA5575-
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1651, AA5575-1671, AA5575-1703, AA5575-
1704, 2.002 Rev A - Block D1 Elevations Full
Set, 2.105 Rev A - Block D1 North Elevation,
2.106 Rev A - Block D1 East Façade, 2.107 Rev
A - Block D1 South Elevation, 2.108 Rev A -
Block D1 West Elevation, D1-5.202 Rev A1 -
Block D1 Elevation and Section Fragment
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and Section Fragment Central, D1-5.203 Rev A
- Block D1 Elevation and Section Roof, AA5575-
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1404, AA5575-1405, AA5575-1406, AA5575-
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1410, AA5575-1411, AA5575-1412, AA5575-
1413, AA5575-1414, AA5575-1415, AA5575-
1640, AA5575-1641, AA5575-1642, AA5575-
1643, AA5575-1644, AA5575-1705, 5.201 Rev
A - Block D2 Elevation Section Fragment
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Section Fragment Roof, 5.203 Block D2
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1706, E-5.201 Block E Elevation and Section
Fragment, Planning Conformity Statement
(Quod, November 2018), Design and Access
Statement (November 2018)

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AA5575-1153 Rev 1, AA5575-1160 Rev 1, AA5575-1161 Rev 1, 2.005 Rev B - Site Elevations – East Elevation, 2.005 Rev B - Site Elevations – South Elevation, AA5575-1652 Rev 1, 2.003 Rev B - Block D2 Elevations Full Set, 2.109 Rev B - Block D2 North Elevation, 2.110 Rev B - Block D2 East Elevation, 2.111 Rev B - Block D2 South Elevation, 2.112 Rev B - Block D2 West Elevation, 2.004 Rev B - Block E Elevations Full Set, 2.113 Rev B - Block E North and East Elevations, 2.114 Rev B - Block E South and West Elevations, AL5575-2100 Rev 1, AL5575-2102 Rev 1, RMA Clarifications (22 January 2019)

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Background Papers

- (1) Case File LE/152/Z/TP
- (2) Local Development Framework Documents
 - Core Strategy
 - Development Management Local Plan
 - Lewisham Town Centre Local Plan
- (3) The London Plan
- (4) NPPF

Designation

Core Strategy – Strategic Site Allocation 6, Lewisham Town Centre, Area of Archaeological Priority, Flood Risk Zones 2 and 3, Major District Centre

1.0 Background to the Report and Matters for Determination

- 1.1 The Lewisham Gateway site is bounded principally by the Lewisham-Blackheath railway line to the north, Lewisham High Street to the east, Rennell Street to the south and the Lewisham-Ladywell railway line to the west. In addition, land on Thurston Road forms part of the wider Gateway site.
- 1.2 Planning permission for the comprehensive redevelopment of the Lewisham Gateway site was originally granted in May 2009. That permission was for a high density mixed-use development defined by a number of development plots and incorporating a number of tall buildings. The permission was part detailed/part outline with details of access and other infrastructure works (comprising a new road layout and the realignment of the Quaggy and Ravensbourne rivers) approved and a number of parameters being set in relation to the outline element in respect of the layout of the development and maximum (and minimum) dimensions of buildings on the site and the quantum and mix of uses. The permission established the principle of north-south and east-west routes through the site, connecting the rail and DLR stations with a new pedestrian crossing on Rennell Street and bus stops on Molesworth Street and Lewisham High Street as well as to the wider area. In addition, the layout included the provision of open space within the site, with a new area of public space at the confluence of the two rivers (referred to as 'Confluence Place') as well as a new square at the southern end of the site (referred to as 'St Stephen's Square').
- 1.3 The infrastructure works, started in Spring 2014, are now complete and the new road layout was operational from August 2016. All reserved matters (excluding access which had already been approved) for Phase 1A and Phase 1B of the development (located immediately to the south of Lewisham rail station and adjacent to the DLR station) were approved by the Strategic Planning Committee in May 2013 and December 2014 respectively. Phase 1A is complete and Phase 1B is largely complete. Works to facilitate the construction of the riverside park element of Confluence Place are currently underway with this element anticipated to be complete in Spring 2019.
- 1.4 On 29 November 2018 the Council granted permission for minor material amendments to the approved 2009 scheme ('the 2018 s.73 permission'). That application, submitted under s.73 of the Town and Country Planning Act 1990, related principally to the parameters of Phase 2 of the approved development comprising the land between Phase 1A/1B and Rennell Street, Molesworth Street and Lewisham High Street. The 2018 s.73 permission included amendments to the scale and massing of blocks in Phase 2 and to the floorspace allocated to the approved uses, as well as the omission of the previously approved basement car parking, and the omission of Block F which had been proposed on the eastern side of Lewisham High Street.

- 1.5 This report relates to an application for the approval of reserved matters in respect of Phase 2 of the Lewisham Gateway site pursuant to the 2018 s.73 permission. Phase 2 comprises the remaining undeveloped part of the site and represents the final phase of the Gateway scheme.

Matters for Determination

- 1.6 The proposed comprehensive redevelopment of the Lewisham Gateway site has been assessed and planning permission has been granted based on a number of development principles and parameters. These included the overall quantum of development and mix of uses, the scale, height and massing of buildings, as well as the general layout of the site including the location of buildings, routes and open spaces. The permission in November 2018 for minor material amendments to the 2009 scheme (reported to the Strategic Planning Committee in March 2018) allowed for a reconfiguration and re-massing of buildings within Phase 2 of the development as well as to the mix of uses within the development.
- 1.7 Condition 2 of the 2018 s.73 permission identifies the following as reserved matters which require approval in respect of Phase 2 of the development, and which are presented in this report for determination by the Strategic Planning Committee:
- Reserved Matters 1 – Layout
 - Reserved Matters 2 – Scale
 - Reserved Matters 3 – Appearance
 - Reserved Matters 4 – Landscaping

- 1.8 An application for the approval of reserved matters is not an application for planning permission. In respect of applications for approval of reserved matters the Town and Country Planning (Development Management Procedure) (England) Order 2015 states only that applications “must include such particulars, and be accompanied by such plans and drawings, as are necessary to deal with the matters reserved in the outline planning permission”. In light of the outline planning permission granted in November 2018 those aspects of the development for determination under this current application relate only to details of the layout, scale, appearance and landscaping of Phase 2 (the ‘reserved matters’). The principle of the development and those elements of the development that have already been approved in outline or in detail (including the road layout, the overall quantum and mix of uses, the scale, height and massing of buildings and the general layout of the site) or which have been implemented do not form part of the current application and are not matters for reconsideration as part of the determination of the proposed reserved matters.

Discharge of Conditions and Compliance with Planning Obligations

- 1.9 In addition to the application for the approval of reserved matters for Phase 2, the Council has also received an application (DC/18/109818) to discharge certain pre-commencement conditions of the outline planning permission granted in November 2018 as well as details to demonstrate conformity with the 2018 s.73 permission and compliance with relevant conditions and planning obligations under the associated s.106 agreement. These include information that is required

to be submitted with the Phase 2 reserved matters application (such as an assessment of micro-climate and pedestrian environment) as well details of the scheme (such as parking for people with disabilities and flood protection measures). The conditions and their general scope are:

- Condition 7 – reserved matters to be in general accordance with s.73 Design and Access Statement.
- Condition 12 – details of phasing.
- Condition 13a – compliance with maximum permitted floorspace/mix.
- Conditions 23 & 24 – pedestrian comfort (wind tunnel assessment).
- Condition 26 – pedestrian comfort (flow analysis).
- Conditions 46 & 50 – sustainability assessment.
- Condition 51 – flood risk protection measures.
- Condition 55 – blue badge parking provision.
- Condition 57 – air quality neutral assessment.

1.10 Where relevant to the consideration of the reserved matters application, details of these topics are identified in this report.

1.11 These conditions have yet to be discharged. If the Committee is minded to approve the current reserved matters application Officers will proceed to determine the application to discharge conditions and compliance with planning obligations under delegated authority.

2.0 Property/Site Description

2.1 The current reserved matters application relates to Phase 2 of the development, that part of the site bounded by Phase 1A/1B and Confluence Place to the north, Lewisham High Street to the east, Rennell Street to the south and Molesworth Street to the west. The area is currently bounded by site hoardings however there is highway footpath along the west, south and eastern sides of the site and bus stops along the western and eastern sides. The Gateway site as a whole comprises 5.6 hectares, with the current Phase 2 reserved matters application comprising an area of approximately 1.56 hectares.

2.2 In the wider area a number of high rise, residential-led mixed use developments have been approved. The Renaissance development at Loampit Vale comprises 794 residential units, Glass Mill Leisure Centre, together with retail and office space in buildings of up to 24 storeys. This development is now complete and occupied. Adjacent to Lewisham Retail Park is the recently completed Thurston Point development, comprising retail space and 406 residential units in buildings of up to 17 storeys.

2.3 An application for the comprehensive redevelopment of Lewisham Retail Park at Loampit Vale (application reference DC/16/97629) for the demolition of all buildings on site to facilitate the provision of 4,343m² of non-residential floorspace

comprising 536 residential units in buildings ranging from 4 – 24 storeys in height was approved at Strategic Planning Committee on 18 October 2017, subject to completion of a s.106 agreement.

- 2.4 An application for the comprehensive redevelopment of the Carpetright site at Loampit Vale (application reference DC/17/102049) for the demolition of existing buildings and construction of two buildings of 16 and 30 storeys in height comprising 870m² non-residential floorspace and 242 residential units was approved at Strategic Planning Committee on 8 February 2018, subject to completion of a s.106 agreement.
- 2.5 An application for the comprehensive redevelopment of the former car park of the Tesco store at Conington Road (application reference DC/18/109184) for mixed use development comprising 365 residential units and 554m² of commercial / community / leisure space in three buildings of up to 34 storeys was approved at Strategic Planning Committee on 18 December 2018, subject to the completion of a s.106 agreement.
- 2.6 To the north of the Lewisham/Blackheath railway line is a row of two storey Victorian houses on Silk Mills Path (with two houses known as Sharsted Villas also accessed via Silk Mills Path) and beyond these properties lies the Tesco superstore and its associated parking. Further to the north are developments at Conington Road, and to the north east the land rises towards Blackheath.
- 2.7 To the east of the site is the St Stephen's Conservation Area which includes the Grade II listed St Stephen's Church and a row of locally listed five storey properties (predominantly in commercial use but including residential) that front Lewisham High Street. To the south of the church is the Police Station. To the south of Rennell Street is Lewisham shopping centre and the 22 storey Citibank Tower.
- 2.8 The site is located within Lewisham Town Centre and is allocated as a Strategic Site (SSA 6) in the Core Strategy. The site falls within Flood Zone 3a and is within an Air Quality Management Area.

3.0 Planning History

- 3.1 On 8 May 2009 planning permission was granted (subject to conditions and a s.106 agreement) for the comprehensive mixed-use redevelopment of the Lewisham Gateway Site for up to 100,000m² gross external area (GEA) comprising retail (A1, A2, A3, A4 and A5), offices (B1), hotel (C1), residential (C3), education/health (D1) and leisure (D2) with parking and associated infrastructure, as well as open space and water features (application reference DC/06/062375).
- 3.2 That permission was part outline (with all matters other than access reserved to subsequent approval) and part detailed (infrastructure works) and comprised four principal elements/phases:
 - Infrastructure, including realignment of the public highway and diversion of the existing Ravensbourne and Quaggy rivers (approved in detail);
 - Phase 1A comprising Buildings A1 and A2 and setting out of public space known as Confluence Place (approved in outline and reserved matters now approved);

- Phase 1B comprising Buildings B1 and B2 (approved in outline and reserved matters now approved); and
- Phase 2 comprising Blocks C, D1, D2, E and F (approved in outline and the subject of this report).

3.3 Since the original permission was granted in 2009 a number of small changes to the development have been proposed by the applicant and approved as non-material amendments under s96a of the Town and Country Planning Act 1990. These have included variations to the wording attached to certain conditions, amendments to the detailed river works drawings, to Building A, and to the highways layout.

3.4 In September 2016, Lewisham Gateway Developments Limited (LGDL) submitted an application under s.73 of the Town and Country Planning Act 1990 (1990 Act) for minor material amendments to the 2009 planning permission (application reference DC/16/09841). This proposed amendments to the scale and massing of blocks in Phase 2 of the Gateway development together with amendments to the floorspace allocated to the approved uses, the omission of Block F on the eastern side of Lewisham High Street and omission of the approved basement car parking. This application was first reported to the Strategic Planning Committee on 21 March 2017 when the application was deferred.

3.5 That application was reported back to the Strategic Planning Committee in July 2017 and on 14 August 2017 was refused permission on the following grounds:

1. The proposed amendments increase the residential floorspace and dwelling numbers through a reduction in the amount of non-residential floorspace on the site and without a proportion of on-site affordable housing being provided, resulting in a land use mix contrary to the development objectives and land use priorities set out in Strategic Site Allocation 6 of the Lewisham Core Strategy 2011; and

2. The proposed increase in the height, scale and mass of the development will increase overshadowing of the public realm resulting in an unacceptable impact on the quality of these public spaces contrary to the urban design principles set out in Strategic Site Allocation 6 and Policy 15 of the Lewisham Core Strategy 2011 and DM Policy 30 of the Lewisham Development Management Local Plan 2014.

3.6 Following the refusal discussions were held with the Applicant regarding amendments to address the reasons for refusal. In addition, grant funding to support the delivery of affordable housing (London Living Rent) within the development was secured. In January 2018 a further s.73 application was submitted (application reference DC/18/105218) for up to 97,545m² of floorspace comprising:

- up to 77,326m² of residential (C3)
- up to 7,725m² of shops (A1), financial and professional services (A2) restaurants, cafes (A3) and drinking establishments (A4)
- up to 1,891m² of office floorspace (B1)
- up to 4,194m² of leisure (D2)
- up to 6,409m² of hotel (C1) or co-living (sui generis)

3.7 The s.73 application proposed amendments to the approved height, massing and layout of buildings within Phase 2 as well as changes to the amount of floorspace allocated to the uses approved under the 2009 permission. The application was reported to the Strategic Planning Committee in March 2018 where it was resolved to approve the amendments subject to conditions and completion of a s.106 deed of modification to apply the existing obligations (where relevant) and appropriate new obligations to the s.73 scheme. The s.73 permission for the amendments was granted on 29 November 2018.

4.0 Current Application

4.1 The application which is the subject of this committee report is for the approval of reserved matters in respect of Phase 2 of the development approved by the outline planning permission granted on 28 November 2018. Condition 2 of that permission states:

Phase 2 of the development shall not be commenced until layouts, plans/sections, elevations and other supporting material detailing the following reserved matters as defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015 in relation to that Phase have been submitted to and approved by the local planning authority:

- (i) layout
- (ii) scale
- (iii) appearance
- (iv) landscaping

4.2 The Town and Country Planning (Development Management Procedure) (England) Order 2015 defines the reserved matters as:

(i) layout - the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development;

(ii) scale - the height, width and length of each building proposed within the development in relation to its surroundings;

(iii) appearance - the aspects of a building or place within the development which determines the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture;

(iv) landscaping - the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes

- (a) screening by fences, walls or other means;
- (b) the planting of trees, hedges, shrubs or grass;

(c) the formation of banks, terraces or other earthworks;

(d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and

(e) the provision of other amenity features.

- 4.3 As noted above, an application for approval of reserved matters is not an application for planning permission. Accordingly, the considerations relevant to the determination of the current reserved matters application relate only to details of the development set out in paragraph 4.2.

Overview of Phase 2 Proposals

- 4.4 The reserved matters for Phase 2 propose four buildings providing a total of 530 residential units (comprising 16 studio units, 238 one-bedroom units, 271 two-bedroom units and 5 three-bedroom units), 119 co-living units and communal facilities, 4,381m² (GEA) of retail/restaurant/cafe floorspace (Use Class A1 and/or A3), 1,525m² (GEA) of co-working floorspace (Use Class B1), a cinema (2,472m² GEA) and gym (1,606m² GEA) (Use Class D2).

- 4.5 The development comprises the following buildings:

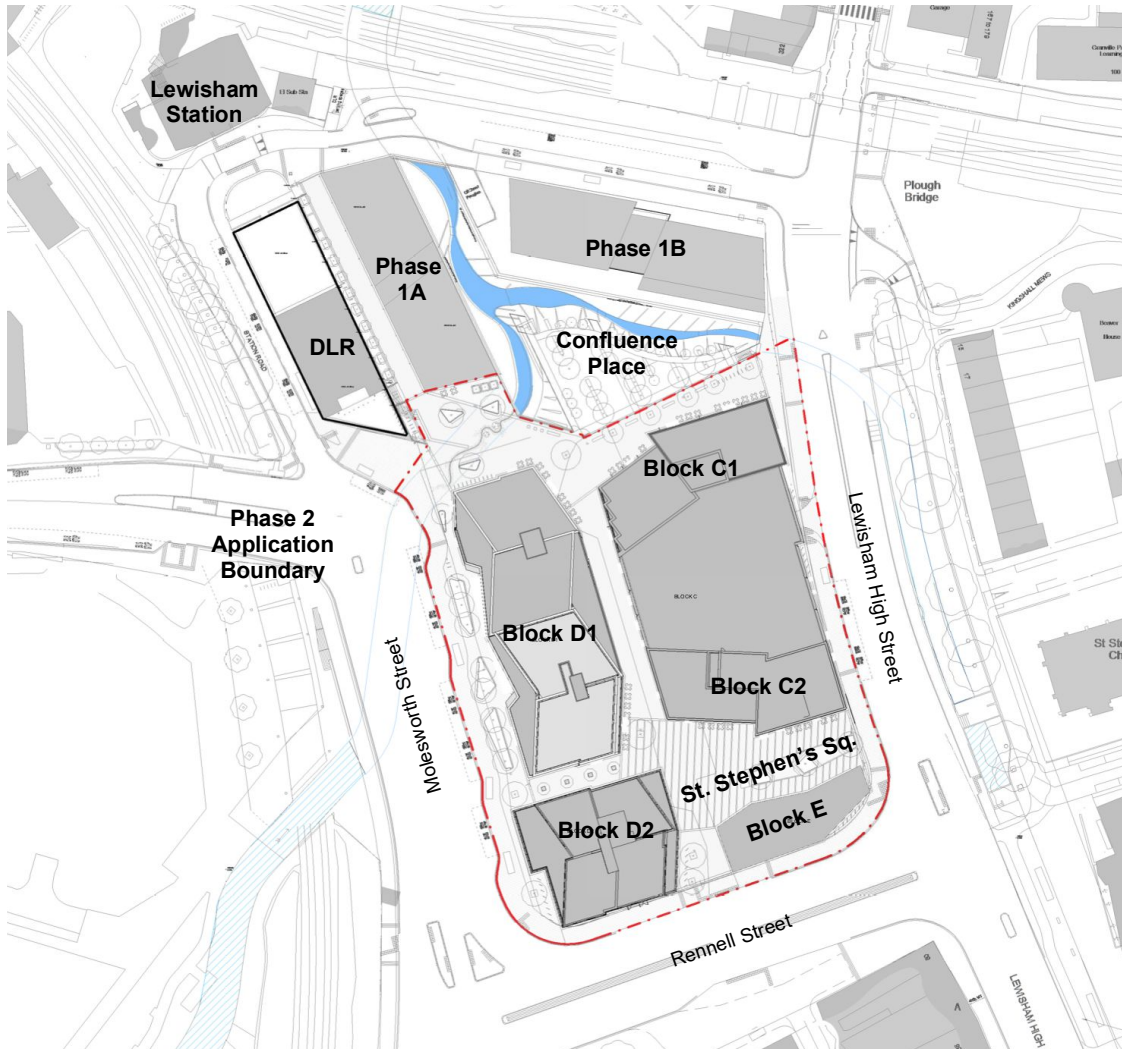
Building C – two principal blocks (C1 and C2) located on the eastern side of the site adjacent to Lewisham High Street. Building C1 comprises ground plus 8/9 storeys to the north (adjacent to Confluence Place) and Building C2 comprises ground plus 10/11 storeys to the south (adjacent to St Stephen's Square), with both buildings linked by a 4 storey podium building. Ground floor internal service yard (with vehicle access from Lewisham High Street), retail/restaurant space, cinema lobby and access to residential (floors 3-12) and co-living accommodation (floors 1-10). The cinema comprises nine screens with a total seated capacity of approximately 900 people. The cinema screens are located at first floor level.

Building D1 – a single block located on the western side of the site adjacent to Molesworth Street. The building rises in height from 16 storeys at its northern end (adjacent to the DLR station) to 19 storeys at the south. Ground floor retail/restaurant and access to gym (1st floor) and residential (floors 3-16/19).

Building D2 – a single block located at the south-western corner of the site at the junction of Molesworth Street and Rennell Street. 30 storeys in height comprising ground and first floor retail and access to residential (floors 3-30).

Building E – a single block located at the south-eastern corner of the site at the junction of Lewisham High Street and Rennell Street. 4 storeys in height comprising basement energy centre and ground plus 3 floors of B1 floorspace.

- 4.6 In addition to the buildings, new public realm around the buildings is proposed including a new north-south route through the site between Buildings C and D1 and a public space at the southern end referred to as St Stephen's Square.



Supporting Documents

Planning Conformity Statement

- 4.7 The Planning Conformity Statement outlines how the current proposals accord with the approved land use and development parameters for the Lewisham Gateway site approved under the 2018 s.73 permission. The document describes the scope of the application and summarises the details of the uses within each block. It also notes those conditions and planning obligations that apply to Phase 2 including the provision of affordable housing at London Living Rents.

Design Statement

- 4.8 The Design Statement sets out the site history covering both the 2009 planning permission and 2018 s.73 permission which established the parameters and design objectives for the scheme as well as the approved Design Framework that establishes the more detailed design guidance. The document outlines the overall design brief for the buildings based on the approved parameters and policy requirements, and the approach to the re-configuration and re-massing of the buildings approved as part of the 2018 s.73 application. The document includes plan typologies, details of the elevation treatment and materials including detailed studies of ground floor treatments, residential levels and upper levels as well as amenity. Other matters such as building maintenance, the acoustic performance of facades and crime prevention are also considered.

Environmental Conformity Report

- 4.9 The original planning application for the Lewisham Gateway development was accompanied by an Environmental Statement (ES) ('the 2006 ES') and an Addendum ('the 2007 Addendum') referred to collectively as the 'original ES'. These documented the likely significant environmental effects of the proposed development and identified measures to mitigate the consequential impacts. ES Addenda were also submitted with the reserved matters applications for Phases 1A and 1B. As part of the s.73 minor material amendments application a further ES Addendum ('the s.73 ESA') was submitted.
- 4.10 Where the planning consent procedure involves a multi stage consent (for present purposes outline consent followed by reserved matters), the effects of a project on the environment should normally be identified and assessed when determining the outline planning permission. Where the development is 'Schedule 2 Development' (i.e. it fulfils the thresholds/criteria in Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) and there are likely to be significant environmental effects which have not been identified and assessed at the outline stage, then EIA will be required to be undertaken at the reserved matters stage and the local planning authority must not grant the reserved matters approval unless the 'environmental information' has been taken into account as required by the EIA Regulations. Thus, it is necessary to consider whether the matters encompassed by the reserved matters application are likely to give rise to new or materially different significant effects on the environment from those previously considered.
- 4.11 Prior to submission of the reserved matters application the Applicant submitted a scoping note to the Council setting out the proposed methodology to be adopted in an Environmental Conformity Report ('the ECR') to accompany the reserved matters application for Phase 2 of the development. It was concluded that the general scope and approach was appropriate and would satisfy the requirements set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the Council issued a response on 17 October 2018, accepting the proposed scope in principle and noting those areas where specific information/clarifications should be provided with the reserved matters application.
- 4.12 The submitted ECR (and subsequent clarifications) assesses whether the impacts of the Phase 2 proposals are consistent with those identified in the s.73 ESA or give rise to new or significantly different environmental effects. This is assessed in terms of impacts during construction and the operation of the completed development as well as cumulatively with other relevant permitted developments. The ECR has been reviewed by specialist consultants appointed by the Council, and the findings of which are reported in Section 7 below. In summary, the ECR concludes, and it is accepted by the Council's consultants, that the reserved matters as proposed are not likely to give rise to new or materially different significant effects on the environment from those previously considered.
- 4.13 The ECR addresses the following topics: Socio-Economics; Air Quality; Noise and Vibration; Transport; Flood Risk and Water Resources; Ecology; Townscape and Visual Resources; Micro-climate; Daylight, Sunlight and Overshadowing; Climate Change Resilience and Mitigation; and Impact Interactions. Although not strictly required in relation to the application, a Non-Technical Summary of the ECR has also been submitted by the applicant.

Consultation Report

- 4.14 The consultation report outlines the pre-submission consultation on the current reserved matters application undertaken by the Applicant, presents the information that has been made publicly available through various channels and provides an overview of the feedback received.

Daylight and Sunlight Study – Blocks D1, D2 and C2

- 4.15 This report assesses the compliance of the proposed residential apartments with the Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BRE, 2011).

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.

Pre-Application Consultation

- 5.2 The Gateway development has been subject to a series of developer and Council led consultation sessions over the last 10 years. In relation to the Phase 2 proposals, following pre-application meetings with Council officers and presentations to the Lewisham Gateway Design Review Panel (detailed below), the applicant carried out a range of pre-application consultation activities in relation to the reserved matters details in October 2018, and full details are set out within the submitted Consultation Report.
- 5.3 The pre-application consultation was based around two public exhibitions held on Saturday 27 October 2018 (Glass Mill Leisure Centre) and Wednesday 31 October 2018 (Lewisham Shopping Centre). The consultation was advertised via a leaflet delivered to approximately 12,000 local residents and businesses, invitations issued to local stakeholders, and via dedicated social media accounts and a consultation website. The public exhibitions were attended by a total of 303 people, who were invited to provide written feedback on the proposals. A total of 49 people provided written feedback. The exhibition materials were also available via a dedicated consultation website.
- 5.4 The Consultation Report outlines the main issues identified in written feedback. The aspects of the proposed development most welcomed by respondents were the design, the provision of retail space, and the provision of a cinema. The main concerns identified included the impact on public transport capacity, the level of affordable housing provision, the impact on the highway network, the height of the proposed buildings, and the impact on social and community infrastructure and services.

Application Consultation

- 5.5 The Town and Country Planning (Development Management Procedure) (England) Order 2015 does not prescribe minimum consultation requirements for applications for approval of reserved matters, nor does the Council's adopted Statement of Community Involvement. However, in common with previous reserved matters applications and to ensure that statutory and non-statutory

consultees as well as members of the public and other interested parties were made aware of the current application, the approach to consultation for applications for planning permission was adopted. This included approximately 14,000 letters being delivered to properties within the consultation area consistent with that used for the 2018 s.73 application (See Appendix 1: Consultation Map) and to those who had commented on the previous applications. An advert was also placed in the Local Press and public notices were displayed around the site.

5.6 Emails providing a link to the application were sent to the relevant ward Councillors.

5.7 The following statutory consultees and stakeholders were also consulted:

- Biggin Hill Airport
- Civil Aviation Authority
- Docklands Light Railway
- Environment Agency
- Historic England
- Health and Safety Executive
- Highways England
- London City Airport
- London Fire & Emergency Authority
- Metropolitan Police Designing Out Crime Officer (Lewisham)
- National Planning Casework Unit
- National Grid
- National Air Traffic Services (NATS)
- Natural England
- Network Rail
- Thames Water
- Transport for London

5.8 The following local groups were consulted:

- Ladywell Society
- Blackheath Society
- Lewisham Green Party
- Lewisham Central Residents Association
- Lewisham Clinical Commissioning Group
- Lewisham Cyclists
- Quaggy Waterways Action Group

5.9 The following Council services were consulted:

- Ecological Regeneration
- Education
- Emergency Planning
- Environmental Health
- Highways
- Housing Strategy

5.10 In addition, the application has been advertised and consulted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Written Responses from Local Residents and Organisations

5.11 A total of 25 objections have been received to date. The table below summarises the nature of objections received and details where these are addressed within the report.

5.12 It is relevant to note that a number of the objections raise matters that relate to principles of the development that have previously been approved under the 2018 s.73 permission. Whilst these are reported so that Members are aware of the range of comments received, they are not material considerations in the determination of this current application. Accordingly, weight should only be given to those comments that relate to aspects of the development that constitute the reserved matters as set out in 4.2 above.

Public Comment Relevant to Determination of Reserved Matters Application	Response / section of report where this is addressed
<i>Appearance</i>	
The design of the blocks is unattractive. The use of so many different materials is jarring, and when taken together with the different materials used across other towers in Lewisham, the collection of buildings will look a mess. The dark colour scheme of Block C is too strong.	Appearance (paras 7.66 - 7.80)
<i>Layout</i>	
The co-living accommodation does not provide a suitable standard of accommodation, with small rooms and shared facilities, and in terms of cost, these units would still be out of reach for most Lewisham residents.	Co-Living Accommodation (paras 7.105 - 7.108)
Air pollution in the local area is poor and damaging the health of local residents. Residents of the proposed blocks won't be able to safely open their windows due to poor local air quality.	Noise Insulation and Ventilation (paras 7.120 - 7.124)
The area suffers from high levels of noise pollution which will impact on the amenity of future occupiers.	
Block D2 will result in overlooking of a large number of properties due to its height.	Orientation and Outlook (paras 7.40 - 7.46)
There needs to be more assessment of the impact on microclimate and wind speeds around the proposed buildings. The Phase 1 buildings have resulted in a wind tunnel effect in the local area.	Environmental Considerations (para 7.176)

Public Comment Relevant to Determination of Reserved Matters Application	Response / section of report where this is addressed
The Phase 2 buildings will result in overshadowing of Confluence Place and the new park.	Overshadowing of Public Realm (paras 7.63 - 7.64)
Bat boxes and swift bricks should be incorporated within the development.	Biodiversity and Ecology (paras 7.146 - 7.151)
There should be greater provision for air purifying plants and trees across the development, including living walls or green roofs.	

Other Public Comments	Observations
<p>Question the demand for retail space given the number of vacant units within and around Lewisham Town Centre, and whether the proposed retail floorspace will undermine the existing retail units within the town centre.</p> <p>No provision for any civic or community facilities such as public meeting rooms or a library.</p> <p>There are insufficient local amenities such as community or youth centres, and insufficient green space. The cumulative impact of this can affect the health and mental wellbeing of the population and increase anti-social behaviour and crime.</p>	<p>The land use mix complies with that approved under the 2018 s.73 permission.</p>
<p>No social housing within the proposed development, and London Living Rent is not affordable for many on the housing waiting list. Question the funding sources for the affordable housing and where the £10m contribution from Council receipts is coming from.</p>	<p>The tenure mix was approved under the 2018 s.73 planning permission. The s.106 agreement requires the provision of a minimum 106 affordable homes to be provided at London Living Rents.</p> <p>At a meeting of Mayor & Cabinet on 28 February 2018, the Mayor approved the use of £9.6m from s.106 contributions towards the London Living Rent units to match fund the £10m</p>

	Government Housing Infrastructure Fund funding.
The proposed dwellings are not suitable for families, and there are very few three bedroom apartments proposed. Lewisham needs more housing suitable for families.	The dwelling mix is in conformity with the ranges approved in the 2018 s.73 permission.
The 30 and 19 storey buildings are too high. The 30 storey tower will be approximately 30% higher than any existing building in Lewisham and will be visible across a wide area.	The building heights and impact on heritage assets were assessed as part of the 2018 s.73 application. The building heights are within the maximum parameters approved in the 2018 s.73 permission.
The proposed development will dominate surrounding historic buildings and conservation areas.	
The height of the proposed development poses a risk for future occupiers in the event of a fire.	The development would accord with all Building Regulations requirements in terms of fire safety.
The proposed development will result in a loss of sun and daylight to surrounding properties. The submitted assessment does not make clear where Block D2 will cast shadow to the west, and the report needs to be augmented to clearly demonstrate the impact on surrounding buildings.	The building heights and impact on sun and daylight to surrounding properties was assessed as part of the 2018 s.73 application. The building heights are within the maximum parameters approved in the 2018 s.73 permission.
The design of the new road layout is poor and results in traffic congestion, and buses backing up along Station Road. The pedestrian crossing on Rennell Street also causes traffic blockages.	The road layout including the location and design of pedestrian crossings was approved in 2014.
The road network and public transport infrastructure (rail, DLR and buses) are unable to cope with the additional demands arising from the proposed development.	The road layout has been approved. Under the s.106 agreement relating to the 2018 s.73 permission £140,000

	(index linked) has been secured for DLR capacity enhancements, and £300,000 (index linked) towards improvement works at Lewisham Station.
There is insufficient parking in the surrounding area to meet the requirements of the number of dwellings proposed. There is no parking provision for the cinema.	Car parking for Blue Badge holders only was approved as part of the 2018 s.73 permission.
The proposed development does not make provision for a direct cycle route from Loampit Vale to Lewisham High Street, requiring cyclists to travel around the busy road network along Rennell Street.	Shared Pedestrian and Cycle Access (paras 7.132 - 7.135)
The development will accommodate over 1,500 additional residents which will generate additional pressure on local schools and health facilities.	The impact of the development on social infrastructure was assessed as part of the 2018 s.73 application.
The area adjacent to the site has historically been prone to flooding and the proposed development will increase this risk.	A flood risk assessment was carried out as part of the original application and the Environment Agency has been involved in the detailed design of the river channels and flood risk mitigation strategy.
The Phase 1 building work was very disruptive for local residents, including damage to properties from piling vibration, and noise disturbance, and assurances are required that Phase 2 will be constructed more considerately. Vibration, noise and air quality monitors should be installed before works on Phase 2 commence. The developer should plant trees and air purifying plants around the perimeter of the site before construction starts to mitigate air pollution associated with dust and vehicle / machinery emissions from construction activity.	Management and mitigation of construction-related impacts is controlled by condition through the approval of a Code of Construction Practice. The concerns regarding construction impacts will be addressed through the CoCP. See Management and

	Mitigation of Construction Related Impacts (paras 8.3 - 8.4)
The construction of Phase 1 including the park at Confluence Place should be completed before Phase 2 works commence.	Construction of the park at Confluence Place is currently under construction and is anticipated to be complete in Spring 2019.
Pre-application public consultation was limited to two days and was not sufficiently advertised. The submitted Consultation Statement does not reflect a clear representation of local feedback at the pre-application stage.	Consultation (paras 5.2 - 5.10)

5.13 A total of 68 expressions of support have been received to date. These highlight that the proposed development will provide important benefits for Lewisham Town Centre including 106 affordable homes, new jobs, new independent shops, a business hub for start-ups, and a cinema.

5.14 The following objections and general comments have been received from local groups / societies.

Blackheath Society

5.15 The Blackheath Society has commented that the latest proposals have much to recommend them and show a commitment to achieving high quality design, however they have concerns relating to a number of areas, including height and massing, materials and colours, mix of uses and sustainability, and visualisations. Their comments are summarised below:

Comments Relevant to Determination of Reserved Matters Application	Response / section of report where this is addressed
<i>Scale</i>	
Blocks C2, D1 and D2 exceed the approved height parameters. The applicant is still pushing beyond the approved height parameters established at the s.73 stage.	Overall Compliance with the Approved Development Parameters (paras 7.17 - 7.18)
Confluence Place is small and hemmed in, being heavily overlooked and overshadowed for much of the day.	Overshadowing of Public Realm (paras 7.63 - 7.64) and Landscaping (paras 7.84 - 7.92)
<i>Appearance</i>	

Comments Relevant to Determination of Reserved Matters Application	Response / section of report where this is addressed
The eastern elevation of Block C to Lewisham High Street is very large with limited fenestration and would be faced with dark materials. This elevation appears unattractive, intimidating and out of character with the buildings facing it.	Appearance (paras 7.66 - 7.80)
In terms of materiality, whilst there are individual details which are good, when used in conjunction with multiple other colours, materials and details, the approach results in a lack of coherence. The extensive use of very dark colours for Blocks C1 and C2 is opposed. Question the durability and weathering of the materials.	
The service entrance to Block C from Lewisham High Street has the potential to create conflicts between pedestrians using this stretch of pavement and goods vehicles.	Servicing and Site Management (paras 7.136 - 7.140)
<i>Landscaping</i>	
The value of St Stephen's Square as a public space is overstated in the submission documents.	Landscaping (paras 7.82 - 7.92)
The stretch of pavement to Lewisham High Street is narrow for the volume of pedestrians it carries. Some form of tree planting along this stretch would improve its appearance.	Landscaping (paras 7.89 - 7.92)

Other Comments	Observations
<i>Mix of uses</i>	
The mix of uses now appears heavily skewed towards residential. The original 2009 consent was for just 57% residential and a larger and more varied range of non-residential uses. Disappointing that the scheme does not include a hotel, which would have improved the mix of the development and increased footfall.	The land use mix complies with that approved under the 2018 s.73 permission.
Up to 77,326m ² of residential floorspace was previously permitted. The current application proposes only 45,633m ² of residential floorspace.	

Up to 7,725m ² of retail / restaurant / café space was previously approved, but this application proposes only 4,381m ² , reducing the mix of uses.	
There are no genuinely civic or community uses or spaces. The development should provide a space which could be used for public meetings, activities and events.	
A large multiplex cinema has the potential to undermine other smaller cinemas in the wider area (Greenwich Picturehouse, and planned provision at both Ladywell and Catford, and small community cinemas).	
<i>Housing Mix</i>	
The proportion of three bedroom apartments is very low. The development will provide very limited family accommodation, skewing the mix towards couples and single people.	The dwelling mix is in conformity with the ranges approved in the 2018 s.73 permission.

Ladywell Society

5.17 The Ladywell Society has made the following comments on the application:

Comments Relevant to Determination of Reserved Matters Application	Response / section of report where this is addressed
<i>Appearance</i>	
The dark brown facing materials are over-dominant and intrusive, particularly in relation to St Stephen's Church and the conservation area.	Appearance (paras 7.66 - 7.81)
The anodised gold panels are brash and tawdry and not in keeping with the town centre location. The effect of sunlight reflected off these panels has not been taken into account.	
The folded elevations of Blocks D1 and D2 will create wind eddies, which would prove uncomfortable for those using bus stops at Molesworth Street and those using 'Retail Street'. There can be sudden gusts of strong wind at the corner of Station Road and Lewisham High Street which have not been appreciated within the design.	Environmental Considerations (para 7.176)

Comments Relevant to Determination of Reserved Matters Application	Response / section of report where this is addressed
The narrow space between Block D1 and D2 will act to funnel wind making this uncomfortable for pedestrians.	
The development does not provide adequate play space. Only the space on the roof of Block C would be suitable as children's play space.	Communal Amenity Space and Playspace (paras 7.115 - 7.119)
Many of the 1 bed (2 person) units are at the minimum 50sqm floor area and would result in cramped accommodation.	All proposed units comply with the Nationally Described Space Standard.
Due to the angled elevations, many of the units have acute corners which are not usable space.	Whilst it is recognised that there are some acute angles within apartment floor plans, it is not considered that these result in any substantive impact on usable floorspace.

Other Comments	Observations
The height of Blocks D1 and D2 will have a detrimental effect on the townscape of central Lewisham.	The building heights and impact on heritage assets were assessed as part of the s.73 minor material amendment application. The building heights are within the maximum parameters approved in the 2018 s.73 permission.
The provision of all affordable housing at London Living Rent levels is not acceptable as Lewisham's need is for social rented housing. There is no mechanism to prioritise those on Lewisham's housing list or those in temporary accommodation for this housing.	The dwelling mix is in conformity with the ranges approved in the 2018 s.73 permission.

Responses from Statutory and Non-Statutory Consultees

Civil Aviation Authority

- 5.20 No objection. Recommend an informative in relation to the need to notify the CAA regarding the proposed erection of any cranes over 91.4m above ground level during construction.

Environment Agency

5.21 No comments received to date.

Highways England

5.22 No objection.

Historic England

5.23 No comments.

Historic England (Greater London Archaeological Advisory Service)

5.24 No objection. The current submission holds no issue in respect of archaeology.

5.25 A programme of archaeological watching brief has previously been undertaken on site in accordance with Condition 28 'Archaeology & Cultural Heritage'. Further site work is not required; however a post-excavation report has yet to be provided to Historic England. It is therefore recommended that Condition 28 should remain in effect until a report detailing the results of the archaeological work is provided to and recommended for approval by Historic England.

London Borough of Tower Hamlets

5.26 No comments.

London City Airport

5.27 No objection. Recommend a condition that no cranes or scaffolding be erected until a construction methodology for the use of cranes during the development has been submitted for approval by the Local Planning Authority in consultation with London City Airport.

National Air Traffic Services (NATS)

5.28 No objection.

Natural England

5.29 No comments received to date.

Royal Borough of Greenwich

5.30 No objection.

Transport for London

Reserved Matters Considerations

5.31 Welcome that the plans set out sufficient space around Molesworth Street for the circulation and congregation of passengers interchanging at Lewisham Station and waiting to board buses, and welcome that the proposed paving materials will match TfL pavement. Question whether a crime and disorder assessment has been carried out, as the proposed planters could provide spaces of concealment.

Highlight that the tree species and their management should not cause any obstruction to bus passengers or affect the operation of the Transport for London Road Network (TLRN).

- 5.32 Seek clarification in terms of the Pedestrian Flow analysis, that the measurements refer to the kerb to building edge distance, rather than the edge of the application red line boundary. The effective width for locations 12, 14 and 15 adjacent to a busy pedestrian crossing are 3.36m, 3.67m (both Level A+) and 3.6m (Level A) respectively.
- 5.33 Note that the Design and Access Statement provides some details in respect of site servicing, and that a "Site Servicing and Management Strategy" required by legal agreement has previously been discharged. Question whether this needs to be updated given the changes to Phase 2, particularly in terms of the removal of basement level.
- 5.34 Note that while the service yard is in Block C, it is not clear if the ground floor elements such as residential concierges (particularly in relation to Blocks D1 and D2) could be served by short stop van deliveries. These may want to park on Molesworth Street or Rennell Street which would obstruct bus stops, junctions and pedestrian crossings. It would not be acceptable for delivery vans to stop on the TLRN outside of authorised bays. The future discharge of conditions on waste management and servicing, and any enforcement on completion, will need to ensure that such operations do not affect the operation of the TLRN and bus network. It will need to be clarified how the management of deliveries between the service yard and the residential concierges would operate.
- 5.35 Short stay cycle parking appears to have been provided at locations which are not all fully accessible by bike, therefore cyclists would have to dismount and walk. Block E contains a cycle café element which might give rise to additional short stay parking requirement. For Blocks C and E it is not clear if the parking is adjacent to active frontages with opportunities for casual surveillance. Cycle parking on the western façade of Block E could for example mirror the parking on the eastern side of Block D2, providing pedestrian flows are not significantly impacted. It may be necessary to provide secure additional long stay parking in the public realm, to avoid fly-parking around other parts of the site which may obstruct pedestrian or emergency vehicle flows.
- 5.36 For Blocks D1 and D2, it is welcomed that there is internal provision for visitor cycles. Clarification is sought on how the cycle strategy for the site agreed in 2013 between the applicant, the Council and TfL has been taken into account in the design of the public realm, in terms of allowing cycle movement through the site without requiring cyclists to dismount. The bollards to the crossing on Rennell Street should allow for cyclists to freely pass showing courtesy to pedestrians.
- 5.37 The scheme has the potential to better direct pedestrians toward the controlled crossing on Rennell Street. Wayfinding should be incorporated at decision points within the site to help with guiding people through the site via Retail Street rather than along Molesworth Street, in order to make the development legible and successful.

Other Comments by TfL

In terms of long stay cycle parking, it is unclear if the provision of conventional cycle parking spaces was considered from the outset as part of the scheme development. While some folding bike provision can be justified where a highly constrained site cannot deliver traditional cycle parking, it would be unusual for the full requirement of 806 long stay residential parking to be provided by folding bicycles. Residents already owning and wishing to use a conventional bicycle would either need to store these within their flats, or within the public realm. Residents already owning or wishing to use oversized bicycles may not be able to access lifts or use conventional stands. The applicant should clarify the design development, and set out how an element of secure conventional and oversized cycle parking could be provided within individual blocks or the public realm, either from the outset or in future.

Responses from Council Departments

Ecological Regeneration

- 5.38 The extent of the proposed living roof provision is supported, in particular the emphasis on biodiverse living roofs. The submitted documents state that living roof seed mixes will be used, which is supported but it be important to ensure that the principal means of establishment is via wildflower plug planting as this will achieve a better and more consistent result. The living roof installer should be commissioned to plant at an appropriate density (e.g. wildflower plugs +20per/m²). Furthermore, a cross section of the intended roof system build-up should be provided to demonstrate that the depth of growing medium is sufficient.
- 5.39 There does not appear to be any bird box provision. Although terrestrial areas for provision may be limited, there are species that will thrive in colonies and that can associate with buildings, e.g. sparrows and swifts. Given the existence of peregrines in the town centre, there should be provision of a peregrine nest tray on the tallest of the blocks, where this would not conflict with any of the roof terraces/amenity and where a location can be found that would not have plant/equipment that requires frequent/periodic maintenance.

Environmental Protection

- 5.40 The submitted documents indicated that for both air quality and noise, the proposed impact with the changes will be to reduce effects as the previously proposed parking has been removed. It would however be useful to provide some reporting on what noise and air quality level improvements are anticipated and the potential implications for their mitigation scheme.

Highways

- 5.41 Due to the excellent transport links immediately adjacent to the site, no on-street car parking is provided within Phase 2 of the Lewisham Gateway scheme, except for the provision of four Blue Badge spaces for any disabled residents or visitors. A Parking Management Plan should be provided, including details of how the four Blue Badge spaces will be allocated and managed. The plan should also include details of how the loading bays within the service yard in Block C and any informal parking in the public realm will be enforced/managed.
- 5.42 Details of the proposed electric vehicle charging points should be provided (for the four Blue Badge parking spaces).

- 5.43 The submitted Travel Plans for Phase 2 should include details of the Travel Plan coordinator, particularly as part of Phase 1 is occupied.
- 5.44 Further details of the location of bin storage for commercial units is required. Further details of the Waste Management Strategy for both the residential and commercial units in Phase 2 is required, including collection areas within 10m drag distance of the carriageway, to ensure bins don't obstruct pedestrian routes within and around the site on collection days.
- 5.45 Further details of the Delivery and Servicing Strategy is required, for all uses within Phase 2. It should confirm: i) whether the service yard in Block C will be used by all blocks, ii) details of the proposed booking system for the service yard, iii) whether the concierge service be available for all blocks, iv) whether there will be holding areas for deliveries which could minimise the impact of delivery and servicing activities at the site, v) how access to the service yard will be controlled, and if gated, details of the type of gates.
- 5.46 Condition 25 of the 2018 s.73 permission states "The development shall not be serviced other than by 10m rigid vehicles or smaller, and no 10m rigid vehicles shall service the development or any part of it between 0700 to 1000 hours and 1600 to 1900 hours, Monday to Friday, unless otherwise agreed in writing by the local planning authority." It needs to be clarified where vehicles larger than 10m would load.
- 5.47 The application confirms that in the event of emergencies, specified vehicles will be able to access the public realm spaces to give emergency personnel access to all blocks, firefighting lift shafts, and dry risers. It needs to be confirmed whether swept path analysis been undertaken for these routes. It also needs to be clarified whether there is an emergency / evacuation strategy for the uses at the site (i.e. the cinema) and whether assembly points been identified.
- 5.48 The Code of Construction Practice and Construction Method Statement for Phase 2 should provide details of pedestrian routes to/from the station during works and the location of any temporary bus stops.

Housing Strategy

- 5.49 No comments received to date.

Local Meeting

- 5.50 Given the level of interest following the statutory consultation on the application, a Local Meeting was held in accordance with the Council's adopted Statement of Community Involvement, taking the form of a drop-in session. All those who submitted comments on the application during the statutory consultation period were invited to attend the drop-in session, which took place from 6pm to 8.30pm on Thursday 24 January 2019 at Glass Mill Leisure Centre. The session was attended by 10 local residents, including a ward councillor.
- 5.51 The note of the key issues raised by those attending the drop-in session is set out at Appendix 2.

Lewisham Gateway Design Review Panel

- 5.52 A Design Review Panel was established for the Lewisham Gateway scheme at the masterplanning stage for the site and ahead of the submission of the outline planning application in 2006. The Design Review Panel has reconvened at key stages throughout the development of the scheme, including ahead of the reserved matters applications for Phases 1A and 1B and the s.73 outline applications. The Panel met in November 2016 to review the emerging designs for Block C and D2 with a follow up session in January 2017. Ahead of the submission of the Phase 2 reserved matters application, the Panel reconvened on two occasions during September and October 2018 to review the detailed designs for the buildings and public realm treatment across Phase 2. These represented the 11th and 12th formal meetings of the Panel respectively, in the context of their engagement from the early stages of the scheme's development. Following this, the applicant team engaged further with the Panel via email in relation to the refinement of various elements, particularly in relation to the design of Block E and St Stephen's Square.
- 5.53 The key points raised by the Panel in their last meeting on 15 October 2018 are summarised below, together with an officer response detailing how these issues have been addressed within the final submission:

Design Review Panel comments	Officer response
<i>Block C</i>	
The Panel recognised that the issue of north-facing units can be difficult to resolve given the block footprints, although they recognised the benefit provided by these units overlooking Confluence Place. The Panel considered that the design and relationship of some of the residential units needed further work, and the detailing of the private terraces/amenity space needs to be clarified.	Single aspect north facing units are limited to a proportion of the co-living units within Block C1, and a limited proportion of the apartments within Block C2. The north facing co-living units in Block C1 benefit from attractive and open views over Confluence Place and the riverside park, whilst the north facing units in Block C2 benefit from views over the communal amenity space on the podium roof of Block C. The four north facing units on Level 4 of Block C2 all benefit from their own private terrace set on the podium roof, adjacent to the communal amenity space. The submission documents include sections showing the relationship between units in Blocks C1 and C2 and the communal amenity space on the podium roof. Landscaping and planting details for the communal amenity spaces across the development have also been provided.
The Panel recommended that a design solution to the level changes be found in order to provide the co-living units with direct access to the communal	Steps and an external platform lift have been introduced, which allows direct access to the communal amenity space on the podium roof of Block C from Level 5 of the co-living block. This will provide direct access to this space

Design Review Panel comments	Officer response
amenity space on the podium roof of Block C.	for all occupiers of the co-living accommodation.
The Panel welcomed the proposed material palette including the use of composite / hybrid ceramic at ground level on Block C. The Panel highlighted that care needs to be taken at construction stage to ensure that the 5mm horizontal gaps between panels is maintained, and requested that there would be on site 1:1 mock ups of key facades for each building for review ahead of the discharge of any materials condition.	Condition 6 attached to the 2018 s.73 permission requires approval of a detailed schedule and samples of materials and finishes prior to any above ground construction works on Phase 2. The developer will be required to erect mock up panels for key facades on site as part of this.
<i>Block D1</i>	
The Panel supported the materials proposed, provided the quality is retained. They also welcomed the richness of the horizontal and vertical design. The Panel suggested that the interlocking of the light and gold panels should be reviewed to prevent the scale of interlocking being too small i.e. it should be at the scale of the storey rather than the scale of the floor plate.	The design team reviewed the elevational treatment of the interlocking elements of Block D1 to reflect the Panel's comments. The use of the gold and white panels which make up the interlocking element is now at the scale of the storey height. Officers consider that this represent an improvement in the visual appearance of this interlocking element.
The Panel commented that the use of larger panels may convey a greater quality. They questioned whether there is too much white material and its robustness over time.	The submitted plans and CGIs indicate the use of larger panels across the elevations. The design quality will be secured via the discharge of Condition 6 attached to the 2018 s.73 permission which requires approval of a detailed schedule and samples of materials and finishes prior to any above ground construction works on Phase 2.
<i>Block D2</i>	
The Panel requested that the size of panels and the	The submitted plans and CGIs indicate the use of larger panels across the elevations.

Design Review Panel comments	Officer response
frequency of joints be reviewed. The identified that the larger panels work better and the smaller ones should be avoided as they made the design look cheaper.	The design quality will be secured via the discharge of Condition 6 attached to the 2018 s.73 permission which requires approval of a detailed schedule and samples of materials and finishes prior to any above ground construction works on Phase 2.
The Panel highlighted a potential 'problem corner' on the south-western corner of Block D2 where no access is proposed, and flagged that careful detailed design will be required. The introduction of bike racks here was suggested to bring more functionality, and the design team clarified that a tree is also proposed adjacent to this corner of Block D2.	The submitted plans identify the location of cycle racks and a feature tree at the south western corner of Block D2, in accordance with the Panel's recommendation.
The Panel noted that CGIs showed mirrored glass covering the floor slab at the base of the building. The Panel highlighted that this should be avoided and a more robust material introduced.	The mirrored glass to the floor slab at the base of Block D2 has been removed and replaced with a more robust material. Whilst this was not shown on the CGIs within the submitted Design and Access Statement, this has been corrected within CGIs subsequently submitted within the reserved matters Clarifications Document (14 January 2019).
<i>Block E</i>	
The Panel felt that the loss of the previously proposed civic function for Block E was regrettable, as a public building in this location would have provided something for the community to focus around.	Prior to the submission of the s.73 outline application, it had been agreed between the Council and the applicant that Block E would not accommodate a civic function. The principle of the co-working space within Block E was approved under the 2018 s.73 minor permission. Officers consider that the design, layout and function of Block E with a café space at ground floor opening up on to St Stephen's Square will allow public access to the building's ground floor, notwithstanding that the building does not comprise a civic function.
In relation to the design of Block E, the Panel felt that whilst positive changes had	The design and layout of Block E was subject to further revision and refinement following the Panel meeting, and design options were

Design Review Panel comments	Officer response
<p>been made, more work was required to demonstrate how the building will enliven St Stephen's Square. The Panel felt that the building should be a real 'gem' and that the design team should look at more rigour and flexibility in the design. The Panel considered that the design team should seek to reduce the number of solid walls to provide more transparency on the ground floor and whether there could be more spill out and interaction at the corners. The Panel expressed concern that the partitioning of co-working spaces over time could have an impact on the transparency and therefore the quality of the building.</p>	<p>shared with the Panel for their endorsement. Significant levels of transparency have been introduced at lower levels, with a double height glazed foyer at the building's eastern extent, and the café space providing glazed and active frontage at the western extent and to St Stephen's Square.</p> <p>The building's footprint was also revisited to create a folded arrangement along its northern elevation, which officers consider better addresses and frames the space within St Stephen's Square as per the recommendations of the Panel in this regard.</p>
<p>The Panel felt that the northern elevation of Block E was too static in presenting a flat elevation to St Stephen's Square, and suggested that the building form could be more of a 'flat v' in order to better frame its relationship with St Stephen's Square and allow more visibility through the transparent ends of the building whilst serving to hide the substations in the fold of the building.</p>	<p>The design and internal layout of the café space has been further refined through the design process to address the Panel's comments.</p>
<p>In terms of the external treatment of Block E, the Panel</p>	<p>Following submission of the application, Officers sought further changes to the</p>

Design Review Panel comments	Officer response
<p>felt that if this is to be a real 'gem' they questioned whether the building should be more differentiated from the others, and whether the use of composite panels was the best solution in this context.</p>	<p>detailed elevational treatment of Block E to reduce the dominance of the gold anodised panelling, which was considered to dominate the building's southern elevation in particular. The design team have refined the external appearance of Block E in this context, as detailed within the reserved matters Clarifications Document (14 January 2019). Officers consider that the amended design strikes an appropriate balance between achieving a gem like quality to the building with its differentiation from the treatment of the other blocks, and its appearance in the wider street scene and how it is read in the context of the other buildings across the Lewisham Gateway site as a whole.</p>
<p><i>St Stephen's Square</i></p>	
<p>The Panel felt that the form of the space, the functions and uses it was being designed to accommodate, and its location next to a main thoroughfare were potentially in conflict with one another. The Panel were not convinced that the dimensions of the space could accommodate market stalls especially once the café concessions have outdoor seating. The Panel advised that any proposals for how the space will be used need to be drawn to demonstrate that the space can realistically accommodate these various functions, and that the design of the space and the building interfaces is coherent.</p>	<p>The design and layout of St Stephen's Square were subject to further revision and refinement following the Panel meeting, and design options were shared with the Panel for their endorsement.</p> <p>The stage element and extent of street furniture / tree planters have been scaled back to ensure sufficient space to comfortably accommodate pedestrian flows through this space and allow flexibility for the range of functions it can accommodate. The stage element has been scaled back to the extended seating base of the western-most of the three raised tree planters, providing a flexible space which can be used for performances and events throughout the year.</p>
<p>The Panel suggested that the space will probably work more like two spaces, with a central space at the confluence of all the routes between Blocks C, D2 and E, and then a smaller rectangular space at the eastern end. The Panel therefore suggested the</p>	

Design Review Panel comments	Officer response
removal of the proposed stage and its tree, and that instead, the western most tree 'base' of the remaining three could be extended slightly to create a smaller stage.	
<i>Materials and lighting</i>	
The Panel welcomed the proposed material samples. They were generally positive about the ceramic elements, and in welcome the more anodised matt 'gold' rather than a gloss metallic 'gold'.	An indicative schedule of materials has been presented as part of the application submission, which reflects those presented to the Panel. The design quality will be secured via the discharge of Condition 6 attached to the 2018 s.73 permission which requires approval of a detailed schedule and samples of materials and finishes prior to any above ground construction works on Phase 2.
The Panel supported the proposed approach for lighting the buildings and St Stephen's Square, welcoming the contribution that this makes to the development. They encouraged inclusion of an artistic element, as well as the functional element of the lighting.	Condition 22 attached to the 2018 s.73 permission requires submission of full details of proposed lighting and external illumination across Phase 2 within six months of the commencement of development. Officers will ensure the provision of a suitably high standard of external lighting scheme via the discharge of this condition.

6.0 Policy Context

Introduction

- 6.1 An application for approval of reserved matters is not an application for planning permission. Accordingly, the provisions of Section 70(2) of the Town and Country Planning Act 1990 (as amended), which sets out the considerations the local planning authority must have regard to in determining applications for planning permission, do not apply in the determination of this application for approval of reserved matters.
- 6.2 Notwithstanding the statutory provisions, there are policies in the development plan for Lewisham which are relevant in assessing the current application. The development plan comprises the Core Strategy, the Development Management Local Plan, the Site Allocations Local Plan and the Lewisham Town Centre Local Plan, and the London Plan. The National Planning Policy Framework (NPPF) is also relevant.

National Planning Policy Framework (NPPF) 2018

- 6.3 The revised NPPF was published on 24th July 2018 and is a material consideration in the determination of this application in so far as it highlights amongst other things the importance of achieving well designed places.

National Planning Practice Guidance 'NPPG' (2014 onwards)

- 6.4 On 6th March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents, and is subject to continuous periodical updates in difference subject areas

The Development Plan

- 6.5 The London Plan, Lewisham's Core Strategy, together with the Site Allocations DPD, the Lewisham Town Centre Local Plan and the Development Management Local Plan constitute the borough's Development Plan.

London Plan (March 2016)

- 6.6 The London Plan was updated on 14th March 2016 to incorporate Housing Standards and Parking Standards Minor Alterations to the London Plan (2015). The policies in the current adopted London Plan (2016) relevant to this reserved matters application include:

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 3.5 Quality and design of housing developments

Policy 3.6 Children and young people's play and informal recreation facilities

Policy 3.7 Large residential developments

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.6 Decentralised energy in development proposals

Policy 5.7 Renewable energy

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 6.7 Better streets and surface transport

Policy 6.9 Cycling

Policy 6.10 Walking

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 7.10 World Heritage Sites
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

6.7 The Mayor of London published a draft London Plan on 29 November 2017. Minor modifications were published on 13 August 2018 ahead of the EIP, which is currently taking place. As such, this document now has some limited weight as a material consideration when determining planning applications. The relevant draft policies are listed below and discussed within the report. These are limited to policies that are materially different to existing London Plan policies. The emerging London Plan policies relevant to this reserved matters application include:

D2 Delivering good design
D3 Inclusive design
D4 Housing quality and standards
D5 Accessible housing
D7 Public realm
D8 Tall buildings
D10 Safety, security and resilience to emergency
D11 Fire safety
D13 Noise
S4 Play and informal recreation
HC1 Heritage conservation and growth
HC2 World Heritage Sites
G4 Local green and open space
G5 Urban greening
G6 Biodiversity and access to nature
S11 Improving air quality
S12 Minimising greenhouse gas emissions
S14 Managing heat risk
S112 Flood risk management
S113 Sustainable drainage
T2 Healthy Streets
T5 Cycling
T6 Car parking

London Plan Supplementary Planning Guidance (SPG)

6.8 The London Plan SPG's relevant to this application are:

- [Planning for Equality and Diversity in London](#) (October 2007)
- [Play and Informal Recreation](#) (September 2012)
- [Sustainable Design and Construction](#) (April 2014)
- [Character and Context](#) (June 2014)
- [Accessible London: Achieving an Inclusive Environment](#) (October 2014)
- [Housing](#) (March 2016)

Core Strategy (June 2011)

6.9 Policies from the Lewisham Core Strategy relevant to this reserved matters application include:

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 12 Open space and environmental assets
 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
 Strategic Site Allocation 1 Requirements for strategic site allocations
 Strategic Site Allocation 6 Lewisham Gateway

Development Management Local Plan (November 2014)

6.10 Policies from the Development Management Local Plan relevant to this reserved matters application include:

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

DM Policy 22	Sustainable design and construction
DM Policy 23	Air quality
DM Policy 24	Biodiversity, living roofs and artificial playing pitches
DM Policy 25	Landscaping and trees
DM Policy 26	Noise and vibration
DM Policy 27	Lighting
DM Policy 29	Car parking
DM Policy 30	Urban design and local character
DM Policy 32	Housing design, layout and space standards
DM Policy 35	Public realm
DM Policy 36	New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens
DM Policy 37	Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest
DM Policy 40	Public conveniences

Lewisham Town Centre Local Plan (February 2014)

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

Policy LTC16 Retail areas
 Policy LTC17 Evening economy uses
 Policy LTC18 Public realm
 Policy LTC19 Tall buildings
 Policy LTC20 Public and shopper parking spaces
 Policy LTC21 Sustainable transport
 Policy LTC23 Heritage assets
 Policy LTC24 Carbon dioxide emission reduction
 Policy LTC25 Adapting to climate change

Residential Standards Supplementary Planning Document (2006, updated 2012)

6.13 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.

7.0 Planning Considerations

7.1 The principle of comprehensive redevelopment of the site has been approved through the planning permission granted in May 2009, as amended by the s.73 minor material amendments permission of November 2018. These permissions approved the overall quantum of development and land use mix, the scale, height and massing of buildings, and the site layout as well as the detail of the new road layout and works to the rivers. Accordingly, the issues for consideration in the determination of the current application relate only to details of Phase 2 of the scheme (the reserved matters) and, where relevant, those details required by conditions to be submitted as part of a reserved matters application.

7.2 The main issues to be considered in the determination of this reserved matters application and related scheme details are:

- Compliance with the Approved Development Parameters
- Layout
- Scale
- Appearance
- Landscaping
- Other Matters
- Environmental Considerations
- Response to Objections

7.3 In addition to those aspects of the development that relate specifically to the reserved matters set out above, Officers have also assessed the scheme against relevant planning policies and guidance in respect of residential accommodation and amenity standards; car and cycle parking provision and servicing, biodiversity and ecology; sustainability and energy. In addition, as required by the s.106 agreement attached to the 2018 s.73 permission, a viability review has been carried out to establish whether the development can provide additional affordable housing.

Overview of Compliance with the Approved Development Parameters

7.4 The overall scale, form and layout of the Lewisham Gateway site as well as the quantum of development and land use mix is defined by a series of development schedules and parameter plans. These were assessed in the Environmental Statement Addendum that accompanied the s.73 minor material amendments application (s.73 ESA) and in granting permission for these amendments the Council was satisfied that, with mitigation, the impacts of the development were acceptable. As part of the assessment of this reserved matters application the

proposals have been considered against the development schedules and parameter plans approved under the 2018 s.73 permission.

7.5 In terms of the land use mix, the maximum approved quantum of floorspace within the Gateway development as a whole is 97,545m² gross external area (GEA). This comprises a maximum of 77,326m² of residential floorspace; 6,409m² of hotel or co-living space; 7,725m² of retail, financial and professional services, restaurant, cafes and drinking establishments; 1,891m² of office space; and 4,194m² of leisure use space.

7.6 The reserved matters application for Phase 2 of the development proposes the following floor areas which, when combined with the floorspace already approved on Phase 1A/1B of the development, demonstrate that the proposed total is below the maximum permitted floorspace and accordingly the reserved matters comply with this aspect of the outline planning permission:

Land Use	Maximum Permitted (GEA)	Phase 2	Phase 1A/1B	Total
Residential (C3)	77,326m ²	45,633m ²	31,181m ²	76,814m²
Retail (A1-A4)	7,725m ²	4,381m ²	1,089m ²	5,470m²
Office (B1)	1,891m ²	1,525m ²	-	1,525m²
Leisure (D2)	4,194m ²	4,078m ²	-	4,078m²
Hotel (C4)/Co-Living	6,409m ²	6,308m ²	-	6,308m²
Total	97,545m²	61,925m²	32,270m²	94,195m²

7.7 Condition 15 of the 2018 s.73 permission states that “At least 2,200m² (Gross Internal Area) of the Class D2 floorspace shall be used as a cinema.” The reserved matters application proposes 2,322m² (GIA) for cinema use and is therefore in conformity with Condition 15.

7.8 A number of representations on the application have raised issue with the mix of uses and balance between the floorspace allocated to each use. This matter was considered as part of the 2018 s.73 minor material amendments application and the land use mix is in conformity with the approved floorspace schedule. The mix of uses is not a material consideration in the determination of this reserved matters application.

7.9 In terms of the scale, form and layout of the development, these are defined in a series of Parameter Plans. Subject to limits of deviation the following parameter plans fix certain key elements of the scheme such as the location and heights of buildings and the extent of public realm.

- Parameter Plan 1 – Existing Site Layout
- Parameter Plan 2 – Proposed Layout: Ground Level
- Parameter Plan 3 – Proposed Layout: Basement
- Parameter Plan 4 – Building Blocks Plan
- Parameter Plan 5 – Public Realm Plan: Ground Level

- Parameter Plan 6 – Open Space Plan: Roof Levels
- Parameter Plan 7 – Vehicular Circulation / Public Transport Plan
- Parameter Plan 8 – Building Heights Plan

- 7.10 Parameter Plan 1 shows the Lewisham Gateway site pre-development and is an historic record for reference only. Parameter Plan 7 shows the road layout as approved and implemented (including the location of pedestrian crossings and bus stops) and is not the subject of this reserved matters application.
- 7.11 Parameter Plan 2 shows the general layout of the site as approved under the 2018 s.73 permission. The general siting of buildings in the reserved matters application complies with the layout shown on Parameter Plan 2.
- 7.12 Parameter Plan 3 shows the extent of a potential basement level across the site. This covers the entirety of Phase 2 (excluding footpaths around the edge of the reserved matters application site) however a basement is proposed only under Building E to accommodate an energy centre. The extent of the basement under Building E is located within and complies with the limits defined on Parameter Plan 3.
- 7.13 Parameter Plan 4 fixes the position of blocks across the site with a horizontal limit of deviation of 5m in any direction except Building E (0/-5m) or where limited by fixed road alignments. The detailed layout of Buildings C, D1 and D2 submitted with this reserved matters application reflect the shape and location of these buildings as shown on the approved parameter plan. Building E has a slightly different footprint than that shown on the parameter plan, with the generally regular shape adjusted to include a slight inflection/deflection along its northern edge and the south eastern edge has a more angular form. These differences are generally accommodated within the limits of deviation permitted by the approved parameter plan although in one location it extends very marginally beyond the approved footprint. This is considered de minimis. Overall, the proposed footprint introduces a more distinctive form, consistent with that of the other buildings on the site and is supported as an appropriate response to this building and its context including how it relates to St Stephen's Square to the north.
- 7.14 Parameter Plan 5 specifies minimum dimensions between buildings as well as showing the general extent of the public realm around the buildings including St Stephen's Square and Confluence Place (the latter already approved and not part of the current reserved matters application). The minimum distances are specified as:

Blocks	Minimum Permitted	Proposed (narrowest point)
B and C	15.0m	20.0m
C and D1	6.8m	6.8m
D1 and D2	5.5m	6.0m
C and E	13.5m	14.0m
D2 and E	8.5m	8.6m

- 7.15 The minimum dimensions between buildings shown on the approved parameter plan in the detailed layout submitted with the reserved matters application are achieved.
- 7.16 Parameter Plan 6 shows the general extent of roof areas and the layout of the buildings in the reserved matters application is consistent with this Plan.
- 7.17 Parameter Plan 8 sets out minimum and maximum building heights across the site as measured from ground level, approximately 8m above ordnance datum (AOD). The maximum permitted height is to main roof level, excluding plant rooms and vent shafts (specified as an average of 4m in height). The following table compares the approved maximum building heights with that proposed in this reserved matters application:

Block	Ground Level (AOD)	Maximum Permitted Height*	Proposed Maximum Height*	Proposed Maximum (incl. plant rooms, parapets and vent shafts)
C1	+9.1m	34.0m	33.2m	35.4m
C2	+9.1m	42.0m	41.4m	42.9m
D1	+9.2m	61.0m	60.8m	62.7m
D2	+9.0m	95.0m	94.2m	97.5m
E	+8.6m	18.0m	15.8m	18.6m

* measured from ground level to main roof level (excluding plant rooms, parapets and vent shafts)

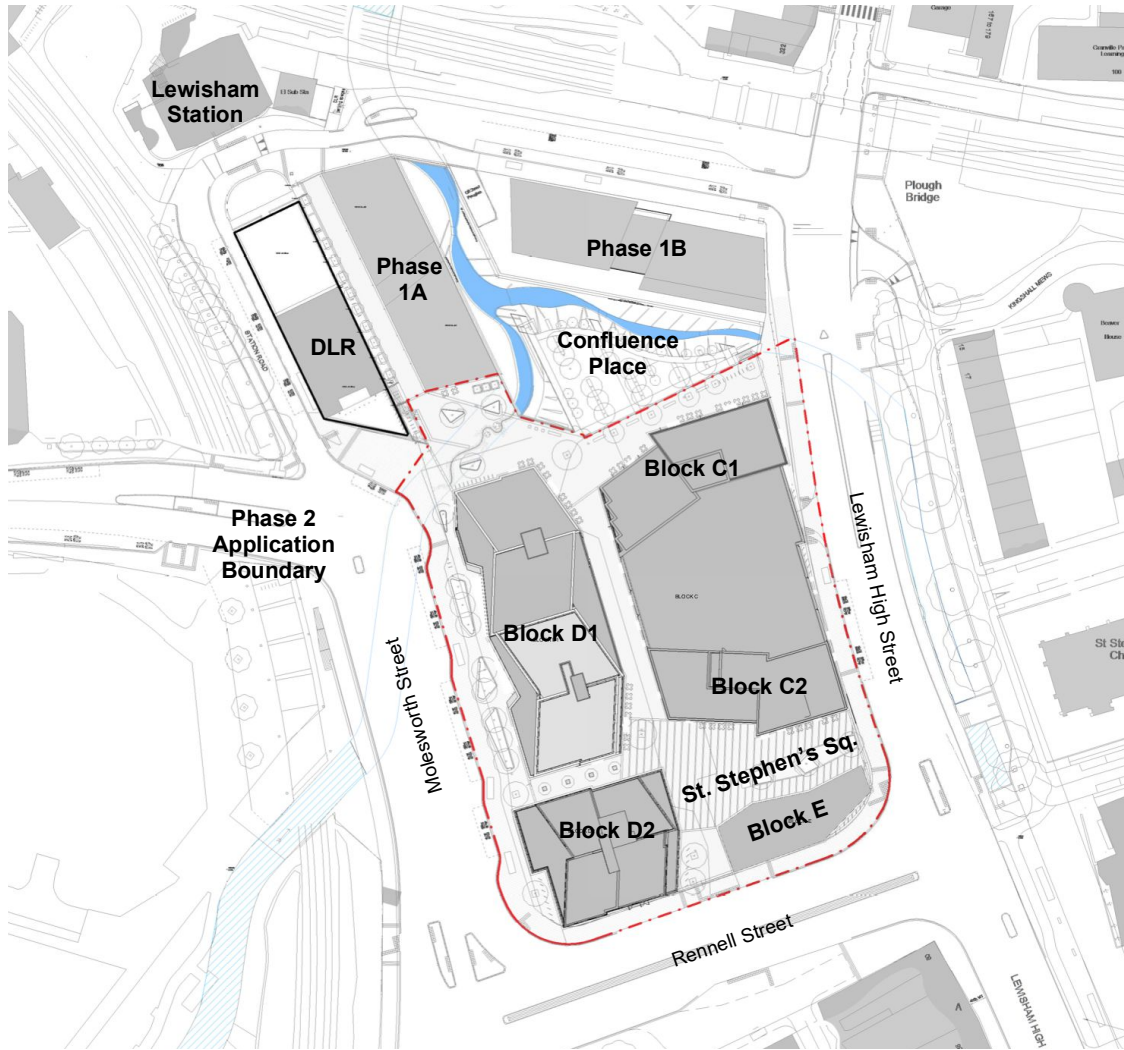
- 7.18 Based on these specified dimensions the maximum proposed height is within the limits set out in the 2018 s.73 permission and Parameter Plan 8. Objection has been raised by the Blackheath Society about building height compliance with the approved dimensions. This is accounted for by including plant rooms, parapets and vent shafts into the measurement, however these are specifically excluded from the approved maximum building heights.
- 7.19 Condition 11 of the 2018 s.73 permission states that “The detailed design of Blocks C, D1, D2 and E including their height, massing and form (and the variation in heights, massing and articulation) shall be in general accordance with the Illustrative Scheme proposed in Figures 5.34, 5.35, 5.36, 5.37, 5.43, 5.44, 5.48, 5.49 and 5.50 of the Design and Access Statement dated January 2018.” These Figures establish the overall massing and appearance of the Phase 2 buildings. Considerations relating to the detailed design of the buildings are addressed elsewhere in this report however the overall dimensions of the buildings within Phase 2 are within the defined limits of deviation allowed for by the 2018 s.73 permission and are in general accordance with the Illustrative Scheme submitted with that application. Accordingly, in terms of scale, massing and siting the reserved matters are in conformity with the outline permission.
- 7.20 Overall the Phase 2 reserved matters comply with the approved land use mix and with the maximum and minimum building dimensions specified in the approved parameter plans.

Reserved Matters

- 7.21 Condition 2 of the 2018 s.73 permission identifies the reserved matters that require approval in respect of Phase 2 of the development: Layout, Scale, Appearance and Landscaping. As set out in paragraph 4.2 above, the scope of the reserved matters is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the assessment of the current application has been undertaken in the context of these definitions. For some of the reserved matters there is a degree of overlap in terms of aspects of the development, for example pedestrian comfort and overshadowing are a product of both the layout of the site and scale of buildings. To avoid repetition, these issues are generally considered under 'Layout'.
- 7.22 The current application also includes details of the Phase 2 development that have been submitted to demonstrate general conformity with other aspects of the outline permission (such as dwelling mix), and to demonstrate compliance with conditions and planning obligations. Information has also been submitted to demonstrate compliance with relevant development standards and these are set out in this report under 'Other Matters'.

Reserved Matters 1 – Layout

- 7.23 Core Strategy Policy 15 (High quality design for Lewisham) sets out the general objectives and approach to securing design quality in new development across the borough and Policy 18 provides more detailed guidance on the design (as well as location) of tall buildings. In respect of Lewisham Gateway itself, Strategic Site Allocation 6 sets out a number of urban design principles for the development of the site. The NPPF also highlights the importance of high quality and inclusive design, and of achieving a good standard of amenity for all existing and future occupants of land and buildings. The NPPF also notes that good design is a key aspect of sustainable development, which includes delivering a wide choice of high quality homes.



7.24 The buildings within Phase 2 of the development (Blocks C, D1, D2 and E) form the southern edge to Confluence Place and establish the north-south route through the middle of the site linking Lewisham Rail and DLR Stations to the pedestrian crossing on Rennell Street and to the existing town centre. In addition to the east-west route along the southern edge of Confluence Place, the layout also provides an east-west route linking Lewisham High Street and Molesworth Street via St Stephen's Square. The layout retains existing pedestrian routes around the edge of the site, enabling access to and waiting areas for the bus stops on Molesworth Street and Lewisham High Street as well as access along Rennell Street. The extent of public realm, particularly along the western edge of the development, will be widened from the current situation, which is defined by the hoarding line, providing a more generous area for people waiting for buses at the stops on Molesworth Street. The proposed public realm and landscaping works are discussed in further detail below within the 'Public Realm and Landscaping' section.

7.25 As set out above, the site layout and relationship between the blocks within Phase 2 is defined (subject to limits of deviation) by the parameter plans which formed part of the 2018 s.73 permission. Parameter Plan 4 (Building Blocks Plan) defines the position of Blocks C, D1, D2 and E and supplementing this Parameter Plan 5 (Public Realm Plan: Ground Level) defines the extent of the public realm and specifies minimum distances between blocks. As noted above, the layout and siting of buildings within Phase 2 complies with the approved parameters.

Block C

- 7.26 Block C would comprise a podium element, with two blocks rising at its northern and southern extents (Blocks C1 and C2 respectively). The podium element would comprise the multi-screen cinema, together with retail and restaurant / café units at ground floor level. Block C1 (at the northern extent of the block, adjacent to Confluence Place) would comprise the co-living accommodation, whilst Block C2 (at the southern extent of the block, adjacent to St Stephen's Square) would comprise a total of 67 residential apartments.
- 7.27 The development has been designed to maximise the extent of active frontages at ground floor level, in order to provide animation to the surrounding routes and spaces. The cinema entrance would be at the south west corner of Block C, fronting on to St Stephen's Square and providing the potential for spill out seating on to this space. The ground floor foyer would provide access to the main foyer and concessions area at first floor level, in turn providing access to the nine cinema screens. Four retail units would provide activity to the block's frontage to Retail Street, with four restaurant / café units, two at the northern extent fronting Confluence Place, and two at the southern extent fronting St Stephen's Square. At the north west corner, one of the restaurant / café units includes additional floorspace at first floor level affording views over Confluence Place. The eastern elevation of the block to Lewisham High Street comprises the main servicing access for the development, with a vehicular service access from Lewisham High Street to an internal service yard within the podium element which provides the commercial servicing for the cinema, retail, gym and restaurant / café uses together with the waste servicing for the residential elements.
- 7.28 The entrance to the Block C1 co-living accommodation is from the north east corner of the block, fronting Lewisham High Street. The co-living accommodation would be accessed via a single building core. The ground floor lobby would give access to the first floor communal space, comprising a communal living area and quiet room, kitchen, gym and laundry room. This floor would also accommodate the co-living facility management offices and facilities. The 119 co-living units would occupy the remaining floors of Block C1, with a communal cycle store at second floor level (accessed via a dedicated cycle storage lift) and storage spaces on a number of floors which would be available to occupiers to rent.
- 7.29 The entrance to the Block C2 residential apartments is from the south elevation of the block from St Stephen's Square. The residential apartments would be accessed via a single building core. The ground floor lobby would give access to the accommodation on the upper floors, which is located on the second floor and above.

Block D1

- 7.30 Block D1 would comprise retail and restaurant / café uses at ground floor level, together with a gym occupying the entire first floor. The upper storeys would comprise a total of 243 residential apartments.
- 7.31 Block D1 has been designed with active ground floor frontages to each of its elevations. Four retail units would front on to Retail Street, being book-ended with a large restaurant / café unit at either end which would positively address the corners and animate the adjacent spaces. The two larger retail units would have

the potential to be dual facing, with secondary frontages / entrances to Molesworth Street. The entrance to the gym would be towards the north west corner of the block fronting Molesworth Street, which would give access to the gym space occupying the entire first floor of the block. Two areas of roof terrace accessible via the gym would be provided along the block's western elevation overlooking Molesworth Street. The residential apartments would be accessed via two separate building cores, with associated lobbies, lifts and building management facilities. The entrance to both cores would be via the Molesworth Street elevation at ground floor level, thereby serving to simultaneously separate the residential access from the other ground floor uses, and afford additional animation to the Molesworth Street elevation at ground floor level. The residential apartments would occupy the second floor level and above.

Block D2

- 7.32 Block D2 would comprise double height retail units at ground and first floor levels (affording the future potential for a mezzanine at first floor level). The upper storeys would comprise a total of 220 residential apartments.
- 7.33 Block D2 has also been designed to maximise active uses at lower levels, with two large retail units which effectively wrap around all four of the block's elevations, providing a strong degree of animation to the surrounding routes and spaces. The entrance to the residential apartments is from the block's northern elevation, on to the east-west pedestrian route that runs between Blocks D1 and D2. The residential apartments would be accessed via a single building core. The ground floor lobby would give access to the accommodation on the upper floors, which is located on the second floor and above.

Block E

- 7.34 Block E comprises the co-working space. The ground floor would be activated with a café (intended as a café with cycle repair facility), which would provide animation to the building's western and northern elevations, affording the opportunity for spill out activity on to St Stephen's Square. The main entrance to the co-working space would be via a double height foyer at the eastern end of the building at the junction of Lewisham High Street and Rennell Street. Cycle storage would be provided at ground floor level, together with meeting room space and associated building management facilities. Co-working space would be provided at first, second and third floors within the building, comprising a range of open plan office floorspace and meeting rooms / private office space. The site-wide energy centre would be located within the basement of Block E.

Pedestrian Comfort

- 7.35 In accordance with Condition 26 attached to the 2018 s.73 permission which requires the detailed layout of all buildings at ground level to be modelled and designed to ensure that a reasonably acceptable walking space is achieved throughout the site, the Applicant commissioned Space Syntax to undertake an assessment of anticipated pedestrian flow through the routes and spaces within the Phase 2 scheme to assess levels of pedestrian comfort. The assessment of pedestrian comfort was carried out using TfL's Pedestrian Comfort Level (PCL) Guidance (2010) and Gehl Architect's standard for pedestrian flow (2004). PCL is estimated as pedestrian density in relation to footway width, in terms of people per

metre per minute (ppmm). The resulting scores are ranked into six ranges from comfortable (A) to very uncomfortable (E) according to the level of pedestrian density. The Gehl methodology also uses people per metre per minute (ppmm) to estimate pedestrian density. According to Gehl, 13ppmm represents an appropriate threshold, beyond which people are likely to use alternative routes. The model was informed by a baseline assessment of pedestrian movement around the Lewisham Gateway site in December 2012, which was verified with a sample dataset collected in 2016. The recorded flows are then uplifted to account for population growth within the area, trip generation associated with development on the application site and surrounding sites, and a forecasted uplift in pedestrian movement flows.

- 7.36 The pedestrian movement forecast indicates that the highest pedestrian flows would be north-south along Retail Street, and east-west through Confluence Place. Here, pedestrian movement can be anticipated to exceed 1,000 people per hour at peak times. The majority of other routes within and around the site are anticipated to have flows of between 500 – 1000 people per hour at peak times.
- 7.37 The outcome of the assessment shows that all assessed locations would be within acceptable levels according to TfL's PCL Guidance, with all locations achieving levels of A+, A or A- (i.e. a maximum of 6 to 8ppmm). For PCL category A, the pedestrian environment is deemed to be comfortable with plenty of space for people to walk at the speed and the route that they choose. The assessment also demonstrates that the routes would be acceptable under the Gehl methodology, falling below the 13ppmm threshold.

Accessible Units

- 7.38 All residential units within Phase 2 will meet the Building Regulations M4(2) 'accessible and adaptable dwellings' standard, and 10% of units (53 of the 530 units across Phase 2) have been designed to meet the M4(3) 'wheelchair user dwellings' standard. 10 of the M4(3) compliant units would be within Block C2 (Levels 2 to 11), with the remaining 43 units in Block D1 (Levels 2 to 16). This level of provision is in accordance with the London Plan requirements, and with the provisions of Condition 8 attached to the 2018 s.73 permission.
- 7.39 In addition to this, Condition 8 attached to the 2018 s.73 permission requires submission of an access strategy in respect of any non-residential floorspace (including the co-living accommodation) within the development and the provision of details of access arrangements for people with disabilities. Taken together, this will ensure provision of suitable accessible units across the development in accordance with policy requirements.

Orientation and Outlook

- 7.40 Over 80% of the apartments would be dual aspect and of those that are single aspect the majority are east or west facing units. In a development of this scale and with large floorplates, it is recognised that there will be some single aspect units however, the design seeks to minimise the number, in particular those that are north facing. There are a limited number of single aspect north facing units in Block C2, however these have views overlooking the communal amenity space located on the rooftop of the podium element of Block C.

- 7.41 Units on the west facing elevations of Blocks D1 and D2 would be afforded open views to the west across Molesworth Street and towards the Lewisham/Ladywell railway line and beyond. Similarly, at higher levels, occupiers of all units within Block D2 and on the eastern facing elevation of Block D1 would be afforded open long range views. Units within Block C2 would be alternatively afforded views north over the podium amenity space, or to the south over St Stephen's Square and across Block E towards the heart of the town centre.
- 7.42 There are a number of units which would have inward facing views towards other blocks within the development. These include a number of the units in the east facing elevation of Block D1, particularly at lower levels, which would face Block C and the two elements (Blocks C1 and C2) which rise at the northern and southern extent of this block. Similarly, the proximity of Blocks D1 and D2 to each other would result in a more limited outlook for windows on these facing elevations (the southern elevation of Block D1 and the northern elevation of Block D2). However, the design and internal layout of the blocks has been designed to mitigate this where possible. There would be a distance of approximately 6m between the southern elevation of Block D1 and the facing northern elevation of Block D2. There are two apartments per floor at the southern extent of Block D1, which are each dual aspect units. Each of these apartments would feature two windows on the southern elevation of the block, facing Block D2. For each apartment, one of these windows would provide a secondary source of outlook and light to rooms whose principal outlook would be to the east or west. The remaining window for each apartment would serve a bedroom. All windows on the southern elevation would be fitted with externally mounted perforated privacy screens to prevent direct overlooking of facing windows in Block D2.
- 7.43 The facing units on Block D2 are also corner units where the principal outlook to the living / kitchen areas is east or west. Each of these apartments would feature three windows on the northern elevation of the block. For each apartment, one of these windows would provide a secondary source of outlook and light to the living / kitchen area, and the remaining two windows would each serve a bedroom. These windows on the northern elevation would be fitted with externally mounted perforated privacy screens to prevent direct overlooking of facing windows in Block D1. This is a similar relationship to that within Phase 1A and 1B where externally mounted perforated privacy screens afford privacy to facing windows. Recognising the urban context of this town centre location, the comparable relationship established under Phases 1A and 1B, and the fact that these windows would either be secondary sources of outlook and light to living areas or would serve bedrooms, this is not considered to be an unacceptable relationship and future occupiers would be afforded a satisfactory level of amenity.
- 7.44 In terms of the facing relationship between Block D1 and the side elevation of Block C2, a distance of approximately 7m would be maintained at the narrowest point. The two apartments per floor at the western extent of Block C2 would both be corner units with dual aspect. The living / kitchen areas of these apartments would be located at this western extent, and each of these rooms would benefit from a dual aspect, with views north over the podium communal amenity space, or south over St Stephen's Square. In terms of the impact on the facing apartments in the eastern elevation of Block D1, it must be recognised that the effect would be mitigated given the relatively narrow profile of the side elevation of Block C2, which would afford more open aspects to the north and south via angled views from windows in facing units.

- 7.45 There would be a similar relationship between Block D1 and the side elevation of Block C1 (the co-living block), where a distance of approximately 7m would be maintained at the narrowest point. As set out above, the design of the co-living units on the west facing elevation of Block C1 features a series of projecting bays which afford these units a secondary aspect, with this element specifically designed to minimise any issue of privacy with the facing units on the eastern elevation of Block D1. Again, in terms of the impact on the facing apartments in the eastern elevation of Block D1, the effect would be mitigated given the relatively narrow profile of the side elevation of Block C1 which would afford more open aspects to the north and south via angled views from windows in facing units. Recognising the urban context of this town centre location and the offset relationship between facing windows, this is not considered to be an unacceptable relationship and future occupiers would be afforded a satisfactory level of amenity.
- 7.46 Distances between the proposed development and Phases 1A and 1B would raise no issues of privacy, with a distance of approximately 24m maintained between the southern elevation of Phase 1A and the northern elevation of Block D1. Distances of between 22 and 58m would be maintained between the southern elevations of Phase 1B and the northern elevation of Block C1, across Confluence Place.

Daylight and Sunlight to Proposed Apartments

- 7.47 An assessment of daylight and sunlight has been undertaken in relation to the proposed residential apartments informed by the guidelines within the Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BRE, 2011).
- 7.48 It is relevant to note that the BRE guidance was prepared for greenfield, suburban situations rather than inner city locations such as the application site. In addition, the NPPF states that when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 7.49 The following table summarises the extent to which habitable rooms in Phase 2 of the development achieve the BRE guidance.

	Block C2	Block D1	Block D2	All Blocks
Meets guidance	106 (68.9%)	346 (56.0%)	430 (77.8%)	882 (66.6%)
Inset balcony with privacy screens to some balconies prevents full compliance	25 (16.2%)	204 (33.0%)	55 (9.9%)	284 (21.4%)
Windows being obscured for privacy prevents	-	55 (8.9%)	61 (11.0%)	116 (8.8%)

	Block C2	Block D1	Block D2	All Blocks
full compliance				
Does not meet guidance	23 (14.9%)	13 (2.1%)	7 (1.3%)	43 (3.2%)
Total	154 (100%)	618 (100%)	553 (100%)	1,325 (100%)

Summary table of daylight and sunlight compliance by habitable rooms

- 7.50 The assessment demonstrates that the majority of habitable rooms achieve acceptable levels of daylight and sunlight (i.e. meet the BRE guidance). The non-compliant rooms in Block C2 are mainly focused on the north facing elevation within the two studio apartments on each floor which overlook the shared amenity space and green roof above the cinema.
- 7.51 For Block D1, the assessment demonstrates that rooms on the western elevation benefit from good potential for daylight due to their open aspect. Although only 56.0% (346) of habitable rooms in Block D1 fully comply with the guidance, this is generally due to the provision of inset balconies to living rooms which means that the vertical sky component (i.e. that part of the sky that is visible from within the room) is affected. This is typical of flatted developments. The living rooms are deep in plan form and therefore distribution of daylight diminishes at the further points from the balcony elevation which affects how well these rooms perform from a daylight perspective. Due to the extensive use of inset balconies as well as privacy screens to these balconies, this prevents full compliance with the guidance across 33.0% (204) of habitable rooms. These rooms are distributed relatively evenly across both eastern and western elevations. The privacy screens fitted to windows on the southern elevation of Block D1 are to prevent overlooking of facing windows in Block D2 which also prevents full compliance with the guidance across 8.9% (55) of habitable rooms.
- 7.52 In Block D2, 77.8% (430) of habitable rooms fully comply with the guidance reflecting its largely open aspect to its eastern, southern and western elevations, and the more limited use of inset balconies compared to Block D1. The privacy screens fitted to windows on the northern elevation of Block D2 (to prevent overlooking of facing windows in Block D1) prevents full compliance with the guidance across 11.0% (61) of habitable rooms. From the 16th floor upwards improvements in daylight are achieved and above the 18th floor these north facing windows do not require privacy screens as they rise above Block D1. These apartments have also been laid out so that the bedrooms have been positioned to face Block D1 as these have a lower requirement for daylight or sunlight in comparison with living rooms.
- 7.53 The London Plan Housing SPG makes clear that BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's

strategic approach to optimise housing density. It also states that quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location, context and standards experienced in broadly comparable housing typologies in London. This advice is also reflected in the NPPF. Whilst full compliance with BRE guidance will not be achieved for all units, the guidance is based on suburban standards and is not as directly applicable in the context of a high density urban development scheme such as Lewisham Gateway. In this context, it is considered that a suitable level of amenity will be provided for future occupiers with regard to daylight and sunlight.

Site Servicing

- 7.54 The parameter plans approved as part of the 2018 s.73 permission show all servicing and deliveries for both the commercial and residential elements of the development via Lewisham High Street. An internal service yard is located within the podium element of Block C, designed to accommodate four large vehicle servicing bays (one capable of accommodating a mobile waste compactor), and a further two standard vehicle parking bays are also provided to accommodate smaller tradesperson and delivery vehicles.

Conclusions

- 7.55 In terms of the detailed siting of the blocks, this seeks to facilitate access to and through the site, and the range of ground floor uses seek to provide activity and animation to each of the routes and spaces. It is recognised that the incorporation of the service yard for the development as a whole on the eastern side of Block C facing on to Lewisham High Street (as well as the cinema above) presents a less active frontage on this side of the development. However, the approved and implemented highway layout means that this is the only part of the site capable of being accessed by service vehicles, with other frontages either being utilised for bus stops and taxi and drop-off/pick-up, or the main east-west traffic route on the A20. Accordingly, the frontage along Lewisham High Street is necessarily the location of the service yard access and was identified as such in the approved parameter plans. To provide some activity along this frontage, the entrance to the Block C1 co-living accommodation would be sited at the northern end of this elevation, and the restaurant / café units that occupy the northern and southern end of this block have return elevations to Lewisham High Street providing some animation. This frontage is also likely to have lower pedestrian flows than the other north-south routes along Molesworth Street and through 'Retail Street', and in the circumstances a lower proportion of active frontage along this elevation is acceptable. Furthermore, as is set out below under 'External Appearance', through its design treatment and materials the detailed design of Block C has sought to maximise the visual interest of this elevation.
- 7.56 In relation to Block D1, the two larger retail units have been designed as dual facing units, with secondary frontages / entrances to Molesworth Street in addition to the primary frontage to Retail Street. The submitted plans and CGIs show glazed double doors from each of these units to Molesworth Street. Providing two entrances to a retail unit is not uncommon, and given the high levels of pedestrian movement along Molesworth Street associated with the bus stops along this stretch, the provision of dual frontage units would also offer advantages for future occupiers in terms of passing trade. Given the importance of these units in providing active frontage to Molesworth Street a condition is considered necessary

to ensure that future occupiers provide and use these as access / egress for the public.

- 7.57 As noted above, the layout of the site provides a number of routes for pedestrians through and around the development to access the retail units, cinema, and residential units as well as to and from the station/DLR. The dimensions of these routes achieve or exceed the minimum specified in approved Parameter Plan 5. Condition 26 of the 2018 s.73 permission also requires an assessment of pedestrian flows and comfort through the site and this is also reported in the submitted Design and Access Statement. This analysis adopts TfL's pedestrian comfort level criteria and shows that based on forecast peak pedestrian flows and the effective width of the routes (i.e. including a buffer zone and taking account of street furniture such as seating, bus stops and trees) each location through and around the development achieves an 'A' rating (A+ to A-). TfL describes this as "very comfortable ... with plenty of space for people to walk at the speed and route that they choose". In the circumstances it is considered that the site layout and siting of buildings provides an acceptable environment for pedestrians and allows for the integration of a range of uses and users including those using bus and rail services which border the site.

Reserved Matters 2 – Scale

- 7.58 As set out above, the scale and maximum height of the blocks within Phase 2 is defined by the approved parameter plans which form part of the 2018 s.73 permission. Parameter Plan 8 (Building Heights Plan) defines the height parameters for each block and the submitted plans demonstrate that the overall heights for each individual block sit within the minimum and maximum range. Working within these parameters, the architects have sought to break down the overall scale of the blocks through the detailed massing and form of the buildings with each block comprising separate but linked elements.
- 7.59 Block C comprises three elements, with the central section (housing the cinema) bookended by Blocks C1 and C2 at its northern and southern extents. The elevations of Blocks C1 and C2 have been cranked and folded and the roof level is stepped to assist in breaking up their mass and add visual interest to the composition of these buildings.
- 7.60 The scale of Block D1 incorporates variation to the footprint of the building at ground, first and upper levels as well as a stepped roof form. The first floor is set back from the western edge of the ground floor of the building and the residential floors above are themselves also set back from the first floor of the eastern edge of the block. The massing of the residential element has been subdivided in to four linked elements which have been cranked and rotated in relation to each other. This gives the appearance of four interlocking elements, which form a 'concertina' effect when viewed from the street. The massing of Block D1 has been further broken down by the stepping of each of these four elements at roof level, such that the block rises from 16 storeys at its northern extent, to a maximum of 19 storeys at its southern extent (rising in increments of one storey with each step). This stepping up in height of Block D1 from north to south also marks the transition in scale to the tallest building on the site, Block D2.
- 7.61 The design of Block D2 also seeks to break down its massing and emphasise its verticality. The building has been subdivided in to four elements through its

cranked and rotated elevations. This creates a more vertical, slender emphasis and there is also differentiation in the height at which these elements terminate, reinforcing the sense of these as four more slender elements which coalesce to form the tower.

- 7.62 The massing of Block E seeks to respond to the general scale of the Grade II listed St Stephen's Church to the east of Lewisham High Street and the Quaggy River. The building presents a slender profile when viewed from the east, which then widens out towards its western extent. The cranked and folded arrangement of the building also serves to better define the space at St Stephen's Square, recognising that this building frames the southern side of this new public space.

Overshadowing of Public Realm

- 7.63 A number of objections raise concern with the potential for the Phase 2 development to result in overshadowing of Confluence Place and its new public park. BRE Guidance sets out two measures for amenity areas to be adequately sunlit throughout the year. The first is that at least half of the amenity space receives at least two hours of sunlight on 21st March; the second whether the amenity space experiences at least 80% of the daylighting achieved in the baseline condition on 21st March. An assessment of the compliance of Confluence Place and St Stephen's Square against these measures was undertaken alongside the s.73 minor material amendments application.

- 7.64 The s.73 scheme was assessed against the baseline of the previously approved 2009 layout, building heights and massing. The assessment showed that whilst neither Confluence Place nor St Stephen's Square passed the first test in either the 2009 approved scheme or the s.73 scheme, both spaces passed the second test under both schemes. Although there was a marginal reduction in sunlight to St Stephen's Square under the s.73 scheme compared with the 2009 approved scheme it still passed the test and in the case of Confluence Place there was a very slight improvement in conditions under the s.73 scheme compared with the 2009 approved scheme. In relation to the s.73 scheme it was accepted that the development would result in acceptable levels of sunlight to these public spaces and the ECR submitted with the Phase 2 reserved matters application confirms that the scale and massing of the proposed buildings is within the parameters assessed at the s.73 stage and therefore results in no additional impact in this regard. As such, the conclusion stands that the development would result in no unacceptable impact in terms of overshadowing of these new public spaces.

Conclusions

- 7.65 Overall, it is considered that the design approach in terms of scale successfully breaks down the larger elements of the blocks which were approved via the masterplan as part of the original outline consent in 2009 and subsequently refined as part of the 2018 s.73 permission. The massing of the individual blocks serves to further refine the buildings and deliver a more varied and dynamic townscape and built form.

Reserved Matters 3 – Appearance

- 7.66 The detailed design and materials palette of the Phase 2 buildings adopts a broadly consistent design philosophy that is differentiated from but also complements the design of buildings in Phase 1. The design intention is that the

four buildings in Phase 2 have their own distinct identity, whilst relating to and forming part of the wider Lewisham Gateway site.

Block C

- 7.67 The podium element of Block C housing the cinema would be faced in a series of fluted ceramic profiles, comprising glazed ceramic tiles in a deep burgundy red. The ceramic profiles would be broken up in to sections, set within powder coated aluminium frames in anodised gold, reflecting the gold accent which runs through both Phases 1 and 2. It is considered that the effect of this is to introduce visual interest to an elevation that necessarily features limited glazing as a result of accommodating the cinema screens. The glazed and textured nature of the ceramic tiles will add interest to these elevations in daylight conditions due to their reflective quality, and a scheme of external lighting will enliven these elevations in the evening and at night.
- 7.68 Blocks C1 and C2 which bookend this podium at its northern and southern extent continue the use of glazed ceramic tiles, however darker tones of black and dark navy are utilised with ribbed tiles providing texture and interest. As with the podium element, these ceramic profiles would be broken in to sections, set within gold coloured powder coated anodised aluminium frames. The windows would also be set within gold aluminium reveals, with gold aluminium panels and glass balustrades framing the balconies on Block C2. The use of the gold accents against the black and dark navy ceramic tiles is considered to create a bold and contemporary design that is distinctive, and yet complements the wider group of buildings with the gold accent being a unifying element across the scheme as a whole.

Block D1

- 7.69 This block would be finished in powder coated aluminium rainscreen cladding panels, with two of the four interlocking elements predominantly faced in anodised gold panels, and the remaining two faced in white / grey panels. Visually this has the effect of creating four distinct elements that are woven together where they interlock. The anodised gold and white / grey panels are also folded across the elevations, creating relief and texture to the appearance of the elevations. A shadow gap formed between the folded panels creates a strong horizontal rhythm which extends across the block at each floor level. Perforated aluminium panels in anodised gold, serving as privacy screens to balconies and to those windows in the block's south elevation facing Block D2, form a repeated pattern across the elevations, with the balconies finished with glass balustrades.

Block D2

- 7.70 As with Block D1, the materials on this block have been designed to reinforce the subdivision of the block's massing in to four elements which emphasises its verticality. The block would be finished in powder coated aluminium rainscreen cladding panels, with a graduation of colour and tone across these panels being used to reinforce the subdivision of the massing. Colour tones would range from dark grey, through mid grey, to light grey / white and would be applied to the elevation to create a vertical gradient, such that one of the four elements of the massing would have the darkest tones at lower levels, rising to the lightest tones at the top. This approach would be alternated on the adjoining element, with the

lightest tones at lower level, rising to the darkest tones at the top. This graduation of tone on each of the four elements seeks to add visual interest to the appearance of the tower in longer range views as well as reinforce the slender form of each element of the tower. The aluminium panels are folded across the elevations, creating relief and texture to their appearance, and a shadow gap formed between the folded aluminium panels creates a strong horizontal rhythm which extends across the building at each floor. Perforated aluminium panels in anodised gold would be used for balcony balustrades and to those windows in the block's north elevation facing Block D1, with anodised gold panels set within the inset balconies, to repeat this unifying theme across the scheme.

Block E

- 7.71 The elevational treatment of Block E comprises alternating bands of powder coated aluminium rainscreen cladding panels with variation in tones of anodised gold and bronze, and bands of ceramic tiling in dark navy which references the material used extensively across Block C2 on the facing side of St Stephen's Square. A series of horizontal bands which wrap the floors and intertwine with each other serve to enhance the dynamic appearance of the building. The glazing at upper levels wraps around the building and would be set within a narrow profile frame of anodised aluminium. The effect of this banding of materials and the form of the fenestration is to create a strong horizontal rhythm to the building. Powder coated aluminium louvres would screen the substation and plant elements at ground floor level.
- 7.72 In the light of comments from Officers the elevational treatment of Block E has been refined following submission of the application in order to reduce the dominance of the gold anodised panelling. Officers consider that the amended elevational treatment of Block E represents an improvement in the detailed design of this block and the revised treatment is supported. Whilst the gold element is retained across the building, reflecting a theme which serves to unify the blocks across the scheme, the amendments result in an improved appearance to this building, particularly to its southern elevation as viewed from Lewisham High Street and Rennell Street. The design remains striking and contemporary, addressing the prominence of this building and is considered to be an appropriate response to this key corner of the site, as well as in framing St Stephen's Square.

Materials

- 7.73 Indicative samples of materials described above have been submitted with the application. Officers are satisfied that as well as being appropriate for the buildings they are of an acceptable quality and durability. Whilst materials are subject to separate approval ahead of the commencement of above ground works under Condition 6 attached to the 2018 s.73 permission, the indicative material samples presented are intended to reflect the proposed materials, and Officers will ensure through the subsequent discharge of this condition that the quality and specification is delivered.

Secure by Design

- 7.74 The scheme has been designed in accordance with the principles of Secure by Design and has been subject to discussions with Crime Prevention Officers. In relation to TfL's comments regarding the raised planters to Molesworth Street

potentially representing a place of concealment, this was not identified as a concern by Crime Prevention Officers. It is considered that through the effective management and pruning of the trees and vegetation within the raised planters, this would prevent these serving as places of concealment. Whilst it is not required by planning condition attached to the 2018 s.73 permission, the applicant intends to proceed with a full Secure by Design application subsequent to approval of this reserved matters application.

Impact on Heritage Assets

- 7.75 Whilst the Lewisham Gateway site is not located within a conservation area the development will be visible from within a number of conservation areas that are adjacent or close to the site: St Stephen's Conservation Area, Belmont Conservation Area, and the extensive Blackheath Conservation Area (which includes the Maritime Greenwich World Heritage Site buffer zone and adjoins the World Heritage Site itself). The Grade II listed St Stephen's Church located to the east of Lewisham High Street is located within the St Stephen's Conservation Area and the Clock Tower at the northern end of Lewisham Market (to the south of the Gateway site) is Grade II listed. Victorian properties fronting Lewisham High Street are locally listed and constitute undesignated heritage assets.
- 7.76 In determining the s.73 minor material amendment application the local planning authority had due regard to the provisions of s.66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in respect of the setting of the listed building and character and appearance of the conservation area. It was noted that in the case of those closest to the site (i.e. St Stephen's Church and Conservation Area) the application site is partially screened by mature trees along the eastern boundary of the River Quaggy which also separates the site from the heritage assets. Existing buildings such as the Police Station, Citibank and the Lewisham Centre are visible from St Stephen's Church and Conservation Area and these large and modern buildings are clearly experienced within the settings of these assets. In the case of other conservation areas, listed buildings and the World Heritage Site, these were more distant from the application site and in the context of the existing baseline and setting it was concluded that the setting of the designated and undesignated heritage assets would be preserved.
- 7.77 The reserved matters proposals incorporate a variety of building heights within each block, as well as the subdivision and articulation of the main elements when compared with the massing set out in the s.73 minor material amendment application. This variety was shown in the illustrative scheme submitted with the s.73 application and it is considered that the evolution of the design and range of materials now proposed as part of this reserved matters application contributes to a significant and positive refinement of the scheme. Overall it is considered that the detailed design successfully mitigates the impact of the proposed development on the identified designated and non-designated heritage assets.

Conclusions

- 7.78 London Plan policies 7.6 and 7.7 and Core Strategy Policy 15 and 18 aim to secure architecture of the highest quality, particularly in respect of tall buildings. The scheme has been extensively reviewed by a site specific Design Review Panel during the design evolution process. The Design Review Panel consider that the buildings are well designed and would make a positive contribution to the

area. As part of the current application, plans to show the architectural detailing of each building have been provided which demonstrate that the finish would be of a sufficiently high quality.

- 7.79 Officers consider that the development would achieve a high standard of design that responds to the prominence and significance of this key site within Lewisham Town Centre. The detailed design successfully breaks down the massing of the proposed blocks through the approach to form, elevational treatment and materials. The detailed design of the blocks and the approach to materials responds to the character of the surrounding area, with the use of high quality ceramic tiles creating texture, reflectivity and interest to Blocks C and E. The design of Blocks D1 and D2 responds to the existing context to the south and west of the site, incorporating powder coated aluminium rainscreen cladding panels in tones of white, grey and anodised gold and bronze. The use of gold and bronze as an accent theme throughout the scheme, reflects its use in Phases 1A and 1B and represents a unifying element across the Lewisham Gateway scheme that serves to unite the buildings as a composition. Officers consider that the detailed design approach is bold and contemporary and will create a landmark development to successfully define this key site in Lewisham Town Centre.
- 7.80 In this context, it is considered that the requirements of Condition 2(iii) of the 2018 s.73 permission in relation to details of appearance have been satisfactorily addressed.

Reserved Matters 4 – Landscaping

- 7.81 The scheme will create a series of new high quality public realm routes and spaces within and around the site, supporting the creation of a high quality public realm within Lewisham Town Centre. These are shown on the diagram below:



- 1 – Retail Street
- 2 – Molesworth Street
- 3 – Lewisham High Street and Rennell Street
- 4 – Confluence Place
- 5 – St Stephen's Square

St Stephen's Square

7.82 St Stephen's Square will be a new public space created at the intersection of the new north-south and east-west routes which will run through the site. The space measures approximately 55m in length, varying in width between 14m and 25m. The square will be surrounded by active frontages at ground floor level. The cinema entrance will be located at the northern extent of the space, with double height retail units at the base of Block D2 framing its eastern extent. The café space at the ground floor of Block E will define the southern extent, with other restaurant / café uses fronting the square at the ground floor of Blocks D1 and C. The residential entrance to Block C2 will also be via the square, and there can be

expected to be high levels of pedestrian throughflow associated with its location at the intersection of two key routes, including the key north-south route running between Lewisham rail and DLR stations and the rest of the town centre.

- 7.83 In terms of its detailed design and materiality, the square would feature contrasting paving of York stone setts with light grey banding which references the stone of St Stephen's Church. A contrasting band of dark granite paving links from Lewisham High Street to the centre of the space, featuring raised planters with seating around. The seating facing the central space within the square can also double as a small performance stage where larger groups can gather. Either side of this central section a broad route is maintained adjacent to Blocks C and E to facilitate movement and enable the ground floor restaurant / café uses to spill out on to the space. The main central part of the square would be open to aid legibility and movement through the space, and provide a flexible area for events through the year. A series of feature trees would be located at the entrances to the square from Rennell Street to the south, and to the north of the main north-south route, with other trees set within raised planters at the eastern and western extent of the square. The submitted Design and Access Statement identifies that public art will be woven in to the fabric of the square in the form of engraved paving at the entrances to the space and with linear paving lighting and feature lighting which will enliven the space in the evening.

Confluence Place

- 7.84 Confluence Place comprises a major new public space within the town centre which lies at the heart of the Lewisham Gateway site. A new public park will be created overlooking the realigned confluence of the Rivers Ravensbourne and Quaggy. The details of this space were approved as part of the reserved matters application for Phase 1A (planning application reference DC/13/082493, granted on 1 May 2013) and subsequently updated as part of the approval of landscaping conditions and a non-material amendment application. Works are currently on site to deliver the riverside public park element of Confluence Place.
- 7.85 The current reserved matters application relates to that part of the public realm which lies to the north of the Phase 2 buildings (Blocks C and D1) and overlooks the park, which sits at a lower level. The hard landscaped public realm element of Confluence Place extends to 88.5m from east to west and between 5.5m and 22.5m in width.
- 7.86 This area of public realm forms a key east-west route connecting Molesworth Street and Lewisham High Street, which will function as a shared space for both pedestrians and cyclists. The space is framed by active uses along its southern extent, which will provide animation to the space. The northern elevation of Block D1 which fronts on to the space includes a restaurant / café unit at ground floor, with the gym above at first floor featuring extensive glazing. The northern elevation of Block C also includes restaurant / café units at both ground and first floor. The space has been designed to allow seating and table spill out from these restaurant / café uses which line its southern extent. A series of benches line the northern extent of the space, allowing views over the riverside park which sits at a lower level. These are interspersed with tree planting to green the public realm and extend its integration with the soft landscaping and tree planting of the riverside park. A feature tree would be sited at the northern extent of Retail Street, with a series of other trees set within raised planters surrounded by seating on the

eastern part of the space close to Molesworth Street. In terms of materials, the public realm within this area would be finished in granite setts to match those implemented on Phase 1.

Retail Street

- 7.87 Retail Street forms the key north-south route between Lewisham rail and DLR stations and the rest of the town centre to the south, and would be lined by retail uses on both sides to extend the town centre offer and benefit from the high levels of pedestrian movement along this route. The space would be approximately 56m long and between 7-10m wide, creating a well defined and urban feel to the space, framed by the buildings on either side. The space has been designed to be kept largely clear and free of street furniture, recognising the volumes of movement that it will be required to accommodate at peak times. Some spill out space is however afforded for tables and seating associated with restaurant / café units at the northern and southern extents of the space, where it widens out as it joins both St Stephen's Square and Confluence Place. In terms of materials, Retail Street would be finished in granite setts to match those implemented on Phase 1.

Molesworth Street

- 7.88 The public realm fronting Molesworth Street will be widened compared to its current extent (approximately 6 to 8m in width) which is limited by the site hoardings. The public realm area will extend to between approximately 6m and 13.5m in width. The space has been designed to provide a generous pedestrian environment, recognising that the series of bus stops along Molesworth Street result in a large number of people waiting in this space throughout the day. The design of the space also seeks to achieve a degree of separation between Molesworth Street and Block D1 through the use of raised granite planters with trees and seating between the bus stops and waiting areas to the west, and footway to the east allowing additional space for pedestrian movement and circulation. This also affords a degree of separation between the heavily trafficked Molesworth Street and the uses within Block D1, and introduces a green spine to visually soften this corridor. The entrances to the residential cores of Block D1 would be via this block's western elevation on to Molesworth Street, and therefore the use of the raised tree planters would also afford some separation for residents of this block from the activity on Molesworth Street. In terms of materials, the public realm in this area would be finished in granite flag paving to match the existing highway footway.

Lewisham High Street and Rennell Street

- 7.89 The public realm to Lewisham High Street and Rennell Street would be largely clear of street furniture to assist with pedestrian movement. The footway would be between 5m and 7m in width. The route would be paved with granite slabs. The vehicle crossover to the internal service yard serving the development, accessed via Lewisham High Street, would be finished in high quality paving with flush granite kerb and granite sett paving to ensure that this space has the feel of a pedestrian footway where pedestrians have priority of movement. In terms of materials, the public realm in this area would be finished in granite flag paving to match the adopted highway footway.

Materials, Planting and Lighting

- 7.90 The proposed paving materials are detailed above in relation to each of the routes and spaces. The proposed materials would be of a high quality and have been designed to reflect the public realm materials used across Phase 1 and within the adjacent highway footway. The raised planters to Molesworth Street and within St Stephen's Square would be finished in granite, with the raised planters to Confluence Place being robust glass reinforced plastic (GRP), which has been previously approved for the raised planters in Phase 1. The rationale for the use of GRP in this location is due to structural loading, as the planters lie above the culvert of the Ravensbourne, and good quality GRP provides a quality appearance as well as reasonable durability. Retractable stainless steel bollards would be introduced at each of the access points to the routes and spaces from Molesworth Street, Rennell Street and Lewisham High Street in order to control vehicular access to these spaces. Street furniture across the public realm would be finished predominantly in stainless steel, to complement the materials used across Phase 1 and ensure a comprehensive approach to the quality of the public realm across the scheme as a whole.
- 7.91 Condition 30 attached to the 2018 s.73 permission requires submission of details of all landscape works including hard and soft landscaping. Through the discharge of this condition Officers will be able to ensure that the quality of the proposed public realm in terms of landscaping materials and planting reflects that set out within the submitted documents which accompany this reserved matters application.
- 7.92 An external lighting scheme is currently being developed for Phase 2, which is anticipated to comprise LED uplighters to raised planters and benches and uplighters to trees across the public realm. In St Stephen's Square, feature lighting is proposed to enliven the space of an evening, to include a combination of lighting set within the paving in the form of strips and spot lights, together with lighting to the feature raised planters and benches. The submitted Design and Access Statement identifies that the design of the lighting in this space will reference the colours of the stained glass windows in St Stephen's Church. The external lighting scheme is being developed by specialist consultants, and will be submitted for approval in due course, pursuant to Condition 22 attached to the 2018 s.73 permission which requires submission of full details of lighting and external illumination within six months of the commencement of Phase 2.

General Conformity with Outline Planning Permission and Compliance with Conditions and Planning Obligations

- 7.93 In addition to details of the reserved matters described and assessed above, the Phase 2 submission includes information to demonstrate conformity with the outline permission and compliance conditions and planning obligations. These are set out below.

Dwelling Mix

- 7.94 The table below summarises the mix of units across Phases 1A, 1B and 2. Note that the 119 co-living units are not included for the purposes of this summary.

	Phase 1A	Phase 1B	Phase 2	All phases
Studio	18	-	16	34

	Phase 1A	Phase 1B	Phase 2	All phases
1 Bed (2 person)	97	83	238	418
2 Bed (3 person)	18	28	101	147
2 Bed (4 person)	56	54	170	280
3 Bed (4 person)	-	-	-	-
3 Bed (5 person)	4	4	1	9
3 Bed (6 person)	-	-	4	4
Total	193	169	530	892

7.95 In terms of dwelling mix, the original 2009 planning permission for the Gateway development approved percentage ranges for studios, 1, 2 and 3 bedroom units. This was not amended by the 2018 s.73 permission. The table below shows the residential mix for Phase 2 and across all phases. This demonstrates that the mix of units is in accordance with the approved range.

	Approved range	Phase 2	Phase 2 (%)	All phases	All phases (%)
Studio	0 – 10%	16	3.0%	34	3.8%
1 Bedroom	30 – 65%	238	44.9%	418	46.9%
2 Bedroom	30 – 55%	271	51.2%	427	47.9%
3 Bedroom	0 – 5%	5	0.9%	13	1.4%
Total		530	100%	892	100%

7.96 A number of objections have highlighted the very limited provision of 3 bedroom units across the development. Phase 2 proposes five 3 bedroom units, with eight having been delivered as part of Phases 1A and 1B. The proposed mix for Phase 2 is consistent with that identified in the approved Development Specification and s.73 application and is within the range established under the 2009 permission. As a high-density high-rise development located within the town centre and bounded on all sides by major roads and railways it is considered that the dwelling mix is appropriate for its context. 2 bedroom units also provide a valuable housing resource suitable for occupation by smaller family households.

7.97 The residential floorspace in Phase 2 comprises PRS (private rented sector) housing, affordable housing and co-living accommodation, as approved under the 2018 s.73 permission and secured in the s.106 agreement to that permission. This

reserved matters application is therefore in accordance with the approved tenure mix and in conformity with the 2018 s.73 permission.

Affordable Housing

- 7.98 The affordable homes would be distributed or 'pepper potted' throughout each of the Blocks within Phase 2, with the exception of the co-living block (Block C1). At the outset these homes are to be located predominantly at lower levels within the blocks, with 17 units in Block C2, 57 units in Block D1, and 32 units in Block D2. In terms of mix, there would be 53 x 1 bedroom units, 52 x 2 bedroom units, and 1 x 3 bedroom unit. The s.106 agreement contains a series of detailed provisions relating to the affordable units, including the distribution of the affordable units across the three blocks, and the size mix of the units. This will ensure that any future changes to the specific location of the affordable units within the blocks will not undermine the principle of providing an appropriate mix of affordable unit sizes (a mix of 1, 2 and 3 bedroom units) and the pepper potting of the units throughout Blocks C2, D1 and D2.
- 7.99 The approach is 'tenure blind' with the affordable units accessed via the same residential cores as the PRS units and being otherwise indistinguishable. The affordable units would be managed by the PRS operator and whilst the location across the development may change in the future, the s.106 agreement associated with the 2018 s.73 permission includes a requirement that the operator submits an annual report to the Council providing details of the location, letting and management of these homes to ensure their continued availability on the agreed terms. As required by the s.106 agreement all of the affordable homes would be provided at London Living Rents.
- 7.100 The s.106 agreement attached to the 2018 s.73 permission requires the developer to submit a revised financial viability assessment (FVA) with the first reserved matters application for Phase 2. This review is to establish whether the residual value has changed since the appraisal submitted with the s.73 application and whether the scheme is able to deliver additional affordable housing. A second review is to be undertaken on occupation of 75% of the dwellings (excluding the co-living units) in Phase 2 of the development.
- 7.101 An updated financial appraisal has been submitted and has been reviewed by external consultants appointed by the Council. Their report is included at Appendix 3 to this report. As part of the assessment of the reserved matters FVA, a review has been undertaken of market evidence relating to the various proposed uses in order to verify the value assumptions. This includes commercial property values and private residential rental values. A comparison of data included within the s.73 application and that submitted for the Phase 2 reserved matters application shows that commercial rents and yields remain unchanged. Given the short period between the s.73 FVA and that for the reserved matters application, as well as general market conditions, this is considered a reasonable approach.
- 7.102 In terms of the PRS accommodation the reserved matters FVA adopts revised rental values which show an average increase in rent from £324/m² to £336/m² when compared with the s.73 FVA. It is also to be noted that the dwelling mix has changed slightly from the assumptions used in the s.73 FVA. Having reviewed the local rental market, including rents currently being charged by the operator, Fizzy Living, within the Phase 1 development, as well as L&Q's PRS scheme nearby, it

is considered that these values are reasonable. In terms of the co-living studio units, the average rent is calculated to be in the order of £580/m² compared with £522/m² for the s.73 FVA. Based on market evidence the rates for the PRS accommodation adopted in the reserved matters FVA are considered to be reasonable. However, whereas the Applicant has adopted GLA London Living Rent benchmark rates for Lewisham Central Ward increased by 3% (the increase in the Consumer Price Index from January to December 2018 i.e. between the s.73 FVA and reserved matters FVA), the Council's advisers have adopted the 2018/2019 benchmark rent.

- 7.103 In terms of construction costs, the total estimate has increased by approximately 8% since the s.73a FVA. This reflects input from the contractor and actual cost allowances for specified elements. Build cost inflation between the s.73 and reserved matters FVA is around 1%. Whilst these updated construction costs have not been reviewed as part of the current assessment of the reserved matters FVA a check has been made of the effect of adopting the s.73 FVA figures (plus build cost inflation). This demonstrates that the overall conclusion from the review exercise would not change. In terms of other costs, these generally remain as in the s.73 FVA and are considered reasonable. The s.106 costs have been updated including the financial contributions to Network Rail and DLR.
- 7.104 When the appraisal is re-run based on the updated costs and values it demonstrates that the scheme delivers a return of 4.85% Profit on Cost, i.e. below the 15% return trigger level for securing additional affordable homes at this time.

Co-Living Accommodation

- 7.105 As required by the Strategic Planning Committee when it approved the s.73 application, each co-living unit has a minimum floor area of 25sqm. These units are arranged with a kitchenette / dining space, ensuite shower room and space for a bed and sitting area. There are also shared facilities provided for all co-living occupiers on the first floor of Block C1, including a communal living space and quiet room, kitchen, laundry room and gym. There would also be additional storage space within the block available for rental by occupiers. For people living in this type of accommodation rent, bills, utilities and taxes are included in a monthly fee with other services such as wifi, cleaning and laundry also normally included. The buildings are managed with a concierge-type service.
- 7.106 The internal layout of the co-living units has been designed to maximise the efficient use of the space, with the bed and sitting area benefitting from good natural light and outlook. The ensuite shower room is located towards the centre of the unit, with a kitchenette and dining space located close to the entrance. This also allows separation between the bed and the entrance, allowing a greater sense of privacy and separation from any noise within the communal corridor spaces. In addition to the communal facilities located at first floor level within the co-living block, all occupiers of the co-living block would have access via Level 5 to the communal amenity space on the podium roof of Block C. Due to internal floor level differences between Block C1 and the podium roof, access to the communal amenity space would be via a series of steps, and an externally fitted platform lift would also be provided to ensure full access to this space for those with impaired mobility.

- 7.107 In terms of outlook, the majority of the co-living units would benefit from an outlook over Confluence Place to the north. Due to their limited size, the majority of units would be single aspect, although where there are opportunities to introduce dual aspect to corner units, this has been provided. The design of the units on the west facing elevation feature a series of projecting bays which afford these units a secondary aspect with glimpsed views towards Confluence Place, with this element specifically designed to also minimise issues of privacy with the facing units on the eastern elevation of Block D1.
- 7.108 It is considered that the co-living accommodation would deliver a suitable standard of amenity for future occupiers with the individual flats being substantially larger than is typical for this type of accommodation elsewhere in London. Recognising the specific nature of this specialist form of accommodation, designed to be smaller independent units with shared communal accommodation, it is not appropriate to apply the requirements of the Nationally Described Space Standards or the London Plan requirements in terms of private amenity space. Notwithstanding this, in terms of outlook, privacy and with access to communal internal facilities and external amenity space within Block C it is considered that an acceptable standard of accommodation would be provided for future occupiers.

General Compliance with Development Standards

Residential Amenity

- 7.109 All of the proposed apartments comply with the floorspace and room dimension standards set out in the Nationally Described Space Standards, in accordance with London Plan and Development Management Local Plan policy requirements.
- 7.110 The vast majority of apartments will be provided with private balconies or terraces meeting or exceeding the external amenity space requirements set out in the London Plan Housing Supplementary Planning Guidance (SPG). There would be a limited number of apartments which would not be provided with private amenity space and there would also be a number of apartments where the size of the balcony space would fall marginally below the London Plan Housing SPG target and where this would not be fully offset by a commensurate increase in the internal floorspace of the apartment.
- 7.111 Within Block C2, a total of 18 apartments would have no private amenity space. Of these, two would be oversized units which would offset the lack of provision of private amenity space via larger internal accommodation. In terms of the 16 units which would have no private amenity space and where this would not be offset by oversized units, these would all be studio units. None of these would be affordable homes which are provided only as 1 or 2 bedroom apartments. The size of balcony space provided to a further nine apartments within Block C2 would fall below the London Plan Housing SPG target (a 1.69m² shortfall per balcony), and this would not be offset by a commensurate increase in the internal floorspace of these units. All of these apartments would however have access to communal roof top amenity space within Block C directly from their circulation core.
- 7.112 Within Block D1, all apartments would have private amenity space in the form of a balcony or terrace. Approximately 22% of apartments in this block (54 of 243) would fall marginally below the London Plan Housing SPG target for balcony size and this would not be offset by a commensurate increase in the internal floorspace

of these units, however this shortfall would be negligible at between 0.1m² and 0.8m². It is also relevant to note that all apartments within Block D1 will have access to the communal roof top amenity space within this block directly from their circulation cores.

- 7.113 Within Block D2, all apartments would have private amenity space in the form of a balcony or terrace. Whilst approximately 11% of apartments in this block (25 of 220) would fall marginally below the London Plan Housing SPG target for balcony size and this would not be offset by a commensurate increase in the internal floorspace of these units, again it must be recognised that the scale of the deficiency would be negligible, at just 0.2m².
- 7.114 Taken as a whole, there would be 3% of units within Phase 2 which would have no private amenity space and where this would not be offset by oversized units. These units would all be studio units located in Block C2, from where occupiers would be readily able to access the communal amenity space located on top of the Block C podium, with direct and level access from Level 4 of Block C2. Whilst it is recognised that the balcony space across a proportion of units falls below the London Plan Housing SPG target (and this would not be fully offset by a commensurate increase in the internal floorspace of these units), the area by which each individual balcony is below the standard would be negligible. In this context, and recognising the extent of communal and public amenity space which the Lewisham Gateway development is providing, on balance it is considered that this does not render the scheme unacceptable in planning terms.

Communal Amenity Space and Playspace

- 7.115 Communal amenity space for residents of the proposed apartments and co-living units would be provided across three rooftop spaces within the development. The principal space would be the roof of the podium element of Block C. Blocks C1 (the co-living accommodation) and C2 would both be provided with direct access from their circulation cores to this space, making it directly accessible to these residents. Two smaller areas of communal amenity space would be located on the rooftop of Block D1, with one space at Level 16 and another at Level 18. These spaces would again be directly accessible from the circulation cores of Block D1. Each of these areas would be provided with hard and soft landscaping together with seating. Taken together, these three spaces would provide 444m² of communal amenity space for residents.
- 7.116 An overshadowing analysis of these communal amenity spaces was undertaken as part of the daylight and sunlight assessment. As set out above, BRE Guidance sets out two measures for amenity areas to be adequately sunlit throughout the year. The first is that at least half of the amenity space receives at least two hours of sunlight on 21st March; the second whether the amenity space experiences at least 80% of the daylighting achieved in the baseline condition on 21st March. The overshadowing analysis found that the two amenity spaces on the roof of Block D1 comply with the BRE criteria throughout the year. In relation to the amenity space on the podium roof of Block C, part of this space falls slightly short of the BRE sun on ground criteria as at 21st March due to overshadowing from Block C2, but receives levels of sunlight above the relevant criteria during the summer months, which is when the space is more likely to be used.

- 7.117 Whilst there would be no communal amenity space within Block D2 itself, due to the management arrangement whereby all blocks would be managed by the same PRS operator, there is the potential for residents within Block D2 to access the larger communal amenity space on the roof of the podium element of Block C. In addition, the Lewisham Gateway scheme is delivering a major new area of public amenity space at Confluence Place, which would also provide opportunities for outdoor recreation for residents of the development, providing a high quality new green space resource within the town centre, and an attractive space overlooking the rivers Ravensbourne and Quaggy.
- 7.118 Using the calculator provided in the Mayor of London's Play and Informal Recreation SPG, the Lewisham Gateway development as a whole (Phases 1A, 1B and 2) would generate an estimated child yield of approximately 53 children. The associated play space requirement would therefore be 528m². The scheme would provide a total of 1,465m² of playable space, reflecting the communal amenity space outlined above, taken together with the hard and soft landscaped spaces at St Stephen's Square and Confluence Place. The rooftop communal amenity spaces within Blocks C and D1 would be designed to accommodate the needs of younger children. To the north, Confluence Place also provides an informal 'playable' space overlooking the green space by the river. Older children would be able to access larger open spaces at Cornmill Gardens and other nearby parks such as Ladywell Fields and Brookmill Park.
- 7.119 Condition 21 attached to the 2018 s.73 permission requires submission of details of communal amenity space provision including the provision of children's play space. This also requires submission of a timetable for provision of the communal amenity space and children's play space with reference to levels of occupation of buildings within Phase 2. This will provide the mechanism to secure the detailed layout and provision within the communal amenity space, and to ensure that it is available for use prior to occupation of the respective blocks. Notwithstanding these provisions a condition is proposed in relation to this reserved matters application to ensure that residential occupiers of Blocks C1 (co-living), C2, D1 and D2 have access to the principal communal amenity space on the roof of the podium element of Block C. The applicant has confirmed that as all blocks will be managed by a single PRS management company, access to this space for occupiers of all blocks can be provided. A condition is however considered necessary to secure this provision in perpetuity, recognising that this represents the main communal amenity space provision across Phase 2.

Other Matters

Noise Insulation and Ventilation

- 7.120 Given its location and being bounded on three sides by main roads, the Lewisham Gateway site experiences high levels of road traffic noise (and to a lesser extent railway noise). The Environmental Statement which accompanied the original outline application for the redevelopment of the site proposed mitigation in the form of acoustic glazing specified to achieve a given level of noise attenuation and ensure acceptable noise levels within the proposed residential units. Updated noise and vibration surveys were undertaken in October 2018 as part of the Environmental Conformity Report submitted alongside the Phase 2 reserved matters application and confirm that the background noise levels within the

Environmental Statement Addendum which accompanied the s.73 minor material amendments application remain valid.

- 7.121 Condition 20 attached to the 2018 s.73 permission requires that all buildings within the development shall be designed to provide appropriate levels of sound insulation to residential units to achieve levels not exceeding 30dB LAeq (night) and 45dB LAmax at night for bedrooms, 35dB LAeq (day) for bedrooms and living rooms, with windows shut and other means of ventilation provided. The condition requires the submission of details of a sound insulation scheme demonstrating that these standards will be achieved. The documents submitted as part of this reserved matters application confirm that all residential accommodation will be designed to meet the acoustic insulation requirements, with the window systems and glazing specification designed to achieve this. Due to the surrounding noise environment a mechanical ventilation scheme is proposed for the apartments. Whilst windows will be openable, the mechanical ventilation scheme will be designed to provide adequate ventilation to the apartments without the need for windows to be opened.
- 7.122 In the interests of the amenity of residential occupiers within and around the development, Condition 16 attached to the 2018 s.73 permission limits the hours of public operation of the non-residential uses across the development to 7am to midnight. Similarly, Condition 19 imposes restrictions on noise from all fixed plant and premises within the development. Taken together with the acoustic insulation requirements it is considered that the proposed development will achieve a suitable standard of accommodation for future occupiers which minimises the impact of noise within the residential accommodation.
- 7.123 The Lewisham Gateway site is located in an area of existing poor air quality, primarily attributable to road traffic. The Environmental Statement which accompanied the original outline application for the redevelopment of the site assessed the likely effects of the development on local air quality and also conditions for future residents. This assessment concluded that whilst annual mean NO₂ objectives would be exceeded in residential units on the lower floors, with mitigation (including drawing in clean air from roof level to the affected flats) an acceptable internal residential environment could be achieved. At the s.73 application stage and in relation to this Phase 2 reserved matters application the air quality assessment has been updated to take account of changes to the baseline conditions, changes to relevant policy and guidance, changes to the scheme and local committed developments, and new modelling tools.
- 7.124 The s.73 ESA predicted that whilst PM₁₀ and PM_{2.5} concentrations within the site will be below the relevant objective levels, concentrations of NO₂ will exceed the annual mean objective up to second floor height across the site. The Applicant has proposed that mitigation is provided up to Level 8 for consistency with Phase 1 and Officers consider that this is a suitably robust approach that would ensure that air quality issues are satisfactorily addressed. This will be in the form of mechanical ventilation to the affected apartments with clean air drawn from roof level. This approach is considered acceptable.

Car Parking

- 7.125 The principle of providing four Blue Badge spaces was agreed as part of the 2018 s.73 permission. In commenting on the s.73 application, TfL noted the availability

of spaces off-site and also concurred that demand for Blue Badge parking is likely to be lower for this scheme due to its town centre location in close proximity to local services and amenities, as well as step free public transport options provided by buses, the DLR and services from Lewisham Station. In their consideration of the s.73 application TfL have confirmed they were satisfied that the scheme provides sufficient capacity to accommodate potential demand for Blue Badge parking arising from the development.

- 7.126 The Council's Highways Officer requested additional details of the allocation and management of the four Blue Badge spaces, as part of a parking management plan. They also requested submission of details to secure electric vehicle charging points for each of these four spaces. In relation to the allocation and management of the spaces, Condition 3 attached to the s.73 permission requires submission of details of on-site vehicle servicing and parking. An additional condition is proposed to secure provision of electric vehicle charging points to the four Blue Badge spaces in accordance with the submitted details.

Cycle Parking

- 7.127 As part of the original outline consent for the site it was agreed that where basements were not provided to buildings, alternative cycle provision would be achieved with 'Brompton' style folding bicycles which can be stored within the apartment. This is reflected in the s.106 agreement which requires the developer to provide free of charge (subject to a reasonable security deposit) a folding bicycle for the occupants of each apartment, and to ensure this is made available in perpetuity for all future occupiers of the units. The submission documents identify that one folding bicycle will be provided to each studio or one bedroom unit, with two folding bicycles provided to all units with two or more bedrooms. For this reason, no dedicated cycle storage facilities are provided for the residential accommodation in Blocks C2, D1 or D2. This reflects the approach across all apartments within Phases 1A and 1B. A limited number of visitor cycle parking spaces are however provided within the residential cores of each block at ground floor level.
- 7.128 Dedicated cycle parking is proposed for the co-living accommodation, recognising that the smaller size of these units affords more limited opportunities for storage of folding cycles. Block C1 is therefore provided with a secure internal cycle store located at Level 2, with access from the ground floor via a dedicated lift that can accommodate cycles.
- 7.129 In addition to this, the development provides storage for up to 62 cycles within a cycle store on the ground floor of Block E. This satisfies part of the site-wide long stay commercial cycle parking provision and would be available for use by employees of the commercial uses across the development, facilitated by a secure access control to its external doors to St Stephen's Square. A further 116 short stay cycle parking spaces are provided within the public realm across the development, to meet the needs of short stay visitors and customers of the retail, restaurant and café units, the gym and cinema. These are spread across the public realm in the form of cycle racks, with larger concentrations of stands within Confluence Place to the north of Blocks C and D1, and along the highway frontages to Rennell Street and Lewisham High Street.

- 7.130 In commenting on this reserved matters application, TfL have questioned the approach to the lack of provision of conventional cycle parking stores for the residential apartments. This approach was previously agreed in relation to Phases 1A and 1B, and it is for this reason that the s.106 agreement makes provision for folding bicycles to be provided to each of the residential apartments. In order to ensure provision of active frontages across the development, and recognising that there is no basement provision across the scheme (with the exception of the energy centre at basement level beneath Block E), there is limited scope to introduce dedicated cycle stores for the quantum of residential units proposed. TfL have also questioned the proposed location of the short stay cycle parking spaces. The short stay cycle parking spaces have been predominantly sited around the Molesworth Street / Rennell Street / Lewisham High Street frontages, in order to minimise the need for cyclists to have to wheel cycles through the development's public realm. The spaces along the east-west route through Confluence Place would be accessible without requiring cyclists to dismount, recognising that this will function as a shared space for both pedestrians and cyclists (as detailed below).
- 7.131 The proposed provision for cycle parking provision is in compliance with the requirements of Core Strategy Policy 14: Sustainable movement and transport and London Plan Policy 6.13. Condition 27 attached to the 2018 s.73 permission requires submission of details of cycle parking provision for residents, visitors and people working within that phase in accordance with cycle parking standards set out in Table 6.3 of the London Plan (2016), including the numbers, type of cycle stands and their location.

Shared Pedestrian and Cycle Access

- 7.132 The original outline planning permission for Lewisham Gateway as consented in May 2009 included a cycle dismount strategy across the public realm within the development.
- 7.133 This recommendation was based on safety concerns related to the potential conflict between cyclists and the large number of people forecast to be interchanging between public transport services and walking through the Gateway area. Following the grant of consent, improved provision for cyclists within the Gateway scheme was developed through liaison between the Council and Transport for London (TfL). The route from Loampit Vale to Lewisham Hill was seen as a particular priority given the lack of alternatives that would allow cyclists to avoid the route via Rennell Street and the associated junctions.
- 7.134 For these reasons, it was agreed that the east-west route that runs through Confluence Place connecting Molesworth Street to Lewisham High Street would operate as a shared space for both pedestrians and cyclists, and that the cycle dismount strategy would not apply to this route. Although research indicates that accidents between pedestrians and cyclists in these circumstances are very rare, it was recognised that the public realm would need to be designed in such a way that encourages cyclists to moderate their behaviour to reflect the density of pedestrian movements, and that this would be achieved by creating a public realm that removes any features to suggest cyclists have priority over pedestrian movement.

7.135 This east-west route through Confluence Place connecting Molesworth Street to Lewisham High Street has therefore been designed as a shared space for both pedestrians and cyclists. The retractable bollards which prevent unauthorised vehicular access to this space would be sufficiently spaced to allow for cyclists to travel through this space without requiring them to dismount. It is considered that this will deliver significant improvements in permeability through the site for cyclists and address some of the current issues faced by cyclists in the navigation of the highway network around the Lewisham Gateway site. As it is not possible to open up routes through the site during the construction phase, these constraints will remain for the three year period of construction of Phase 2 (additional detail is set out within the 'Implementation' section below), however once the Phase 2 development is complete and all public routes and spaces are open the scheme will deliver considerable improvements for both pedestrian and cyclist permeability through the site and surrounding area. The s.106 agreement contains provisions to secure continuous access on foot and by bicycle over these routes and spaces upon completion of the development.

Servicing and Site Management

- 7.136 A site-wide Site Servicing and Management Strategy (SSMS) has been previously approved by the Council and TfL which establishes the key principles for site servicing. This provides that deliveries and servicing will be provided via a dedicated service yard incorporated within the ground floor of Block C and accessed via Lewisham High Street. The s.106 agreement secures ongoing compliance with the SSMS across the scheme as a whole.
- 7.137 A service corridor at ground floor level within Block C provides internal access from the service yard to uses within Block C for the purposes of servicing and deliveries. This includes the retail and restaurant / café units, the cinema, the co-living accommodation in Block C1 and the residential apartments within Block C2. The service corridor also provides the means of access between the service yard and the other blocks within the development. It provides access to a central location on Retail Street, from where deliveries and serving for the other blocks would be transported within trucks and trollies, with the timing of this co-ordinated by the development's management company to ensure this takes place outside of peak periods. The SSMS makes clear that the service yard will be staffed to ensure the arrival, loading and departure of delivery vehicles within the service yard is undertaken safely and with minimal noise. Deliveries for commercial and residential occupiers will need to be pre-booked.
- 7.138 Removals for the residential units will operate in a similar way, with the service yard able to accommodate removal vans of up to 4m in height, with removal access taking place via the internal service corridor within Block C, and then travelling through the public realm to access the residential cores of Blocks D1 and D2.
- 7.139 Condition 25 attached to the 2018 s.73 permission imposes restrictions on servicing arrangements, setting out that the development shall not be serviced other than by 10m rigid vehicles or smaller, and that no 10m vehicles shall service the development between 7 – 10am and 4 – 7pm on weekdays in order to ensure large vehicle servicing takes place outside of peak periods. Whilst the SMSS establishes the principle of site-wide servicing, it is recognised that this was prepared at the outline stage and prior to the s.73 minor material amendments

application. Whilst the parameters for site servicing as set out in the SSMS remain appropriate, given that the final mix and floorspace of uses has changed as a consequence of the 2018 s.73 permission, and has been refined as part of this Phase 2 reserved matters application, a condition is proposed to require submission of a Detailed Servicing and Management Strategy. This will provide the mechanism to ensure that the detailed servicing and delivery requirements of the proposed uses are effectively managed to minimise impacts in terms of highway congestion, pedestrian / cyclist safety or noise disturbance. This addresses comments by the Council's Highways Officer and TfL in this regard, and will ensure that the detailed arrangements for site servicing for Phase 2 are submitted for future approval.

- 7.140 In relation to TfL's identified concerns regarding the potential for delivery vehicles to stop on the red route and obstruct the TLRN, the service yard within Block C provides facilities for delivery vehicles to drop off deliveries, which would then be conveyed to the relevant block via the site-wide servicing and delivery management arrangements. As set out above, a condition is proposed requiring submission of a Detailed Servicing and Management Strategy for approval, which will provide the mechanism to secure the detailed approach to servicing and deliveries. Should delivery drivers seek to ignore the approved approach and obstruct the red route, they would clearly be liable for a Penalty Charge Notice and associated enforcement.
- 7.141 Black cab and taxi drop for the Lewisham Gateway development will remain as at present, via the existing Station Road loop which lies to the north of Phases 1A and 1B.
- 7.142 In the event of emergencies, specified vehicles will be able to access the public realm spaces between the blocks, via the retractable bollards at the entrances from Molesworth Street, Rennell Street and Lewisham High Street. This will provide emergency personnel access to all blocks, firefighting lift shafts, and dry risers. In relation to the comment made by the Council's Highways Officer, the applicant has subsequently confirmed that swept path analysis has been undertaken for access by emergency service vehicles.

Waste

- 7.143 The provision of refuse storage for the residential apartments is based on the principles applied within Phase 1 of the development, based on the size of the dwellings (each bedroom generating 60L of unrecyclable waste and 30L of recyclable waste per week). The same principles have been applied to the co-living accommodation, with each unit assumed to comprise one bedroom for the purposes outlined above. Bin stores are located at ground floor level within the residential core of each block (Blocks C1, C2, D1 and D2), with waste collected in 1280L Eurobins. The bin stores within Blocks C1 and C2 are connected via the service corridor within this block to the internal service yard, where bins will be taken for refuse collection. For Blocks D1 and D2, there will be a managed drag route from the residential cores of these blocks to the service corridor of Block C, which provides access to the internal service yard for the purposes of collection. The transfer of bins will be the responsibility of the development's management company to ensure this takes place outside of peak periods.

- 7.144 Commercial waste will be dealt with in a similar way, with waste from the commercial units in Blocks D1, D2 and E being transported via the public realm along a managed drag route, to the service corridor within Block C, for the purposes of collection from the internal service yard. The commercial uses within Block C would have direct internal access to this service corridor. The service yard has been designed to accommodate a mobile compactor within one of its larger vehicle bays, which would be used for the compaction of commercial bulky waste. Commercial waste collections will be strictly managed to ensure they occur during off peak periods thereby avoiding the busiest trafficked periods and so limiting the impact on bus and taxi service operations.
- 7.145 Condition 45 attached to the 2018 s.73 permission requires submission of details of a Waste Strategy for Phase 2. This will provide the mechanism to secure details of the approach to waste management across the development, including the managed drag routes and timings through the public realm. Ensuring that this is timed to avoid conflict with peak periods of movement through the public realm and is effectively managed to co-ordinate with street cleansing activities will be key in the discharge of this condition. The Council's Highways Officer requested additional information regarding the approach to waste management across Phase 2, and it is considered that the provisions of Condition 45 will provide the mechanism to effectively secure this.

Biodiversity and Ecology

- 7.146 Green and biodiverse living roofs are proposed across the majority of roof space across the blocks. Green roofs are proposed on the roof space at Level 2 on the eastern elevation of Block D1 facing Retail Street, and on the roof spaces at Level 2 of Block D2. Recognising that these green roof spaces are at lower levels within these blocks and will be overlooked by surrounding apartments, these spaces will comprise pre-grown plug planted wildflower perennials providing year round vegetation cover and benefits for wildlife. As such they will also afford visual amenity benefits in addition to the biodiversity benefits.
- 7.147 Biodiverse living roofs will be used to cover the majority of the roof spaces across the scheme as a whole, including the roofs of Blocks C1 and C2, and on the eastern half of the roof of the Block C podium element (where the western half comprises the communal amenity space), together with the roofs of Blocks D1, D2 and part of Block E. These biodiverse living roof spaces will comprise wildflower plugs planted on a substrate to provide habitat for plants and insects. Where possible, biodiverse planting has also been incorporated in the space between roof mounted mechanical and electrical plant. The biodiverse living roof on the eastern half of the roof of the Block C podium element would also feature a raised planter with evergreen hedging along its eastern edge to Lewisham High Street. This will be visible from the street and will create a green edge to the façade along this stretch, adding further interest to this elevation from street level. The cinema roof mounted plant on Block C will be screened with climbing plants trained on a wire trellis to afford screening to this element and soften it in views from surrounding units in Blocks C1, C2 and D1.
- 7.148 Tree and vegetation planting across the three rooftop communal amenity spaces and within the public realm contribute to biodiversity value across the site. The submitted landscape strategy which forms part of the reserved matters submission details the planting of Italian Alder along Molesworth Street, Field Maple and Red

Oak to Confluence Place, and Koster Oak and Honey Locust trees to St Stephen's Square, with Silver Birch planted within the route between Blocks D1 and D2. Low level planting would be provided in the raised planters at Molesworth Street, Confluence Place and St Stephen's Square. The plant species would be predominantly evergreen and hardy to ensure robustness over time. The planters in Confluence Place would contain more native plants to reflect a more naturalistic planting approach to this space that links to the planting of the riverside park.

- 7.149 The Council's Ecological Regeneration & Open Space Policy Manager has reviewed the submitted documents and has expressed support for the living roof provision and in particular the emphasis on biodiverse living roofs. In response to comments, the Applicant has provided a cross section demonstrating the proposed depth of substrate across the biodiverse living roofs. Condition 29 attached to the 2018 s.73 permission requires submission of details of green and living roofs prior to the commencement of Phase 2 works, which provides the mechanism to ensure the detailed provision of these spaces (in terms of substrate depth, planting density etc.) is acceptable and will contribute to the creating of thriving spaces with considerable biodiversity value.
- 7.150 The Council's Ecological Regeneration & Open Space Policy Manager has also requested the provision of a Peregrine Falcon nest tray on the roof of Block D2 (the highest point within the development), together with provision of a range of bird boxes across the development. A condition is proposed requiring submission of details in this regard.
- 7.151 It should be noted that Condition 40 attached to the 2018 s.73 permission requires that there must be no light spill into the watercourses and the adjacent river corridor habitat in order to protect the diurnal rhythms of wildlife using the river corridor.

Sustainability and Energy

- 7.152 Condition 50 of the 2018 s.73 permission requires the submission of a Sustainability Assessment to confirm that specified energy efficiency and water efficiency standards are achieved. In terms of energy efficiency, Phase 2 is to achieve a 31% improvement in the Dwelling Emission Rate over the Target Emission Rate (as defined in Part L of the 2013 Building Regulations as amended) measured as an area-weighted average across all residential buildings within Phase 2. The strategy to achieve the required improvement follows the Lean, Clean, Green energy hierarchy with a fabric (Lean) and energy efficiency (Clean) first approach followed by the implementation of low and zero carbon technologies (Green) based on the use of photo-voltaic arrays.
- 7.153 The scheme incorporates passive design and energy efficiency measures together with an energy centre located under Building E. The masterplan for the Gateway development as a whole has been designed to accommodate two energy centres and enable the implementation of a district heating energy network (within Phase 1 and 2 respectively). The Phase 1 energy centre has been brought into operation with Blocks A1 and A2, and after Phase 2 is completed the two energy centres will be connected through a common district energy network that will serve the entire Lewisham Gateway scheme. The Phase 2 energy centre will be designed to facilitate the potential future connection of the site-wide energy network into an area-wide district heating network, should one become available.

- 7.154 The energy efficiency assessment achieves the required carbon emissions reduction across Phase 2 based on building fabric and CHP. The scheme will include PV arrays however these may serve the commercial rather than residential floorspace and therefore have not been included in the calculations. Nonetheless the scheme is able to achieve the required carbon emission reductions.
- 7.155 Water efficiency measures are required to achieve an average household water consumption of less than 105 litres/person/day. The strategy identifies a range of options to achieve the required water consumption level based on the specification of low water use WCs, shower taps, baths and white goods.

Environmental Considerations

- 7.156 As noted above, an Environmental Conformity Report (ECR) was submitted with this reserved matters application together with a number of clarifications in response to the Council's review of the document. The ECR assesses whether the detailed scheme presented in the current application will give rise to new or materially different likely significant effects on the environment from those considered as part of the s.73 minor material amendment application and thus whether the reserved matters are required to be subject to environmental impact assessment under the EIA Regulations. As set out below, it is considered that there are no new or materially different likely significant effects on the environment from those identified in the s.73 Environmental Statement Addendum (s.73 ESA) and an EIA is not required in relation to the proposals set out in the reserved matters application.
- 7.157 The following is an overview of the findings of the ECR and, where relevant, a commentary on those findings.

Socio-Economics

- 7.158 The ECR notes that the s.73 ESA identified impacts ranging from minor adverse effects (on demand for healthcare, education and playspace), to moderate and major beneficial effects (in terms of housing provision, employment effects and public realm and open space improvements). Overall the impact of the scheme with respect to socio-economics was assessed to be moderate beneficial. The ECR concludes that there are no changes in the cumulative scenario that would result in material changes to the assessment presented in the s.73 ESA.
- 7.159 The ECR has reviewed baseline conditions where updated information is available since the s.73 ESA (Education – 2018 Annual Schools Census Data and Healthcare – 2018 NHS data on local services and capacity). Based on an assessment of the likely significant effects of the development in the context of those identified in the s.73 ESA the ECR concludes that there is no material change to the type or scale of impacts. In respect of employment, during construction the development is forecast to generate a slightly higher number of jobs (300 full time equivalent (FTE) jobs compared with 260 in the s.73 ESA) but fewer jobs during operation (385 FTE jobs compared with 525-665 in the s.73 ESA). The explanation for this reduction in operational employment is a combination of the lower retail/restaurant and office floor area in this reserved matters application compared to the s.73 application and also the inclusion of the co-living accommodation instead of the hotel. The resident population and number of children is similar to that forecast in the s.73 ESA and demand for healthcare

services and education the effects would be the same resulting in a long-term effect of minor adverse significance.

- 7.160 In respect of open space and public realm the provision in the current application is in line with that in the s.73 ESA resulting in a permanent effect of major beneficial significance at the local and district scales. With the slight reduction in child yield the play space requirement arising from the current application is slightly lower than that assessed in the s.73 ESA. The effect of the additional demand for playspace as a result of the development overall is therefore expected to remain in line with the s.73 ESA, that is a long-term effect of minor adverse impact at the local scale.
- 7.161 The reserved matters scheme will provide job opportunities in the co-working space (estimated as 100 FTE jobs) as well in retail and food and drink premises (250), the gym (25) and the cinema (10). Whilst forecast job opportunities has decreased from that set out in the s.73 ESA, it is considered that the range of uses and floorspace proposed contributes to the mixed use development of the Gateway site and together with retail/restaurant floorspace in Phase 1A/1B will have a beneficial effect on the local economy.

Air Quality

- 7.162 The ECR notes that given the relatively short amount of time since the s.73 ESA was submitted, there are no known changes that would result in a material change to the receptors or associated impacts. In addition, the air quality assessment methodology utilised remains applicable and there have been no changes to air quality emission factors, background mapped concentrations or assessment tools since the assessment was undertaken. The ECR concludes that there are no new or different significant effects, or changes to the findings of the s.73 ESA.
- 7.163 In terms of impacts on air quality, forecasts of construction traffic have been provided as part of the ECR clarifications and concludes that construction traffic flows would represent a low percentage of overall traffic movements and would be temporary in nature resulting in a negligible impact on the road network. The construction-generated traffic flows have been assessed based on the peak period of construction, expected to last approximately three months between mid-July and mid-October 2020, when an annual average daily traffic (AADT) trip generation of 160 vehicles is anticipated. Assuming an eight-hour working day, this would equate to an average of 20 two-way trips per hour and when distributed across the local highway network the impact on each part of the road network would reduce from this level. Based on these forecasts, concentrations of NO₂, PM₁₀ and PM_{2.5} were predicted at the identified existing receptor locations to consider the impact of construction-generated vehicle emissions on local air quality. This shows that in all locations, predicted concentrations of PM₁₀ and PM_{2.5} will remain the same and they will also remain the same for the majority of locations for NO₂. In a small number of locations concentrations of NO₂ are predicted to very marginally increase however this increase is less than 0.5% of the relevant objective and assessed as negligible. In one location, Loampit Vale between Jerrard Street and Elmira Street, a moderate adverse change in annual mean NO₂ concentrations is predicted however this would not exceed the annual mean air quality objective for NO₂. Overall the construction traffic will result in minimal increases in pollutant concentrations and no new exceedances of the relevant air quality objectives are predicted.

- 7.164 Regarding operational impacts, the ECR notes that the residual significance of vehicle emissions on existing sensitive receptor locations was assessed in the s.73 ESA as 'not significant' with no mitigation measures recommended or required. It concludes that the proposed development will not expose any new receptors to elevated concentrations of nitrogen dioxide (NO₂), PM₁₀ or PM_{2.5} and therefore no mitigation is required. In respect of the energy centre located under Block E, condition 58 of the 2018 s.73 permission requires an assessment of pollutant emissions from the facility. The ECR notes that details to comply with that condition will be submitted in due course however the energy centre will include a NO_x abatement system, where required, to reduce impacts of NO₂ on existing and proposed receptors, as appropriate.
- 7.165 Officers are satisfied that the ECR has appropriately assessed the likely impacts on air quality and concur with the findings of the ECR.

Noise and Vibration

- 7.166 The ECR states that an updated baseline noise and vibration survey was undertaken on-site in October 2018 to determine current noise and vibration levels. The assessment notes that noise level limits for fixed plant items have been set in accordance with the requirements of Planning Condition 19 and identifies detailed glazing and ventilation specifications to ensure the requirements will be achieved.
- 7.167 In respect of construction impacts the ECR notes that works will be undertaken in accordance with best practice measures stipulated by the Control of Pollution Act 1974, with mitigation as appropriate incorporated into working practices. Condition 32 of the 2018 s.73 permission requires the submission and approval of a Code of Construction Practice prior to commencement of works. The ECR concludes that no new or different significant noise and vibration effects were identified in relation to the reserved matters proposals and as a result, there would be no material changes arising from the approved s.73 scheme and the impacts therefore conform with those assessed as part of the s.73 ESA.
- 7.168 Objection has been raised to the current application on the grounds of construction impacts (referring to impacts to properties on Silk Mills Path, north of the Lewisham-Blackheath railway line, during the construction of Phase 1A/Phase 1B). Phase 2 of the development is further away from these properties and therefore the level of impact can be expected to be lower than for Phase 1. There are properties to the south of Phase 2 (on the south side of Rennell Street) and on the eastern side of Lewisham High Street (separated by the road and River Quaggy) and the Code of Construction Practice will also need to consider if measures to minimise impacts on these properties are required.

Transport

- 7.169 The ECR states that given the relatively short amount of time since the s.73 ESA was submitted there are no known changes that would result in a material change to the receptors or associated impacts. In terms of the construction phase, the s.73 ESA concluded that no mitigation measures were required and that due to a net reduction in forecast vehicle trips to and from the site when compared to the 2009 approved scheme, no mitigation measures were required as part of the operational phase of the development.

- 7.170 It is considered that the impacts of the reserved matters proposals are consistent with those identified as part of the s.73 ESA and no further mitigation beyond that secured through the 2018 s.73 permission are required.

Flood Risk and Water Resources

- 7.171 The ECR states that given the relatively short amount of time since the s.73 ESA was submitted there are no known changes that would result in a material change to the receptors or associated impacts and concludes that there are no material changes to the likely significant effects, proposed mitigation measures and overall conclusions from those identified in the s.73 ESA.
- 7.172 The ECR identifies various measures set out in the Code of Construction Practice and Construction Management that will be adopted to mitigate impacts during construction, noting that the s.73 ESA concluded that the residual environmental effects of the construction phase will be negligible due to the temporary nature of the construction works. In respect of the completed development the ECR notes that finished floor levels have been set in accordance with recommendations provided by the Environment Agency for Block C, however Blocks D2 and E retain ground floor levels in some sections below 8.76m AOD for design reasons and in those areas a Flood Evacuation and Management Plan has been submitted in order to satisfy Condition 51.

Ecology

- 7.173 The ECR states that given the relatively short amount of time since the s.73 ESA was submitted, there are no known changes that would result in a material change to the receptors or associated impacts. Construction impacts identified in the s.73 ESA were the release of contaminants/dust which may affect local wildlife sites and disturbance to bats due to new lighting. Mitigation will be secured through a Code of Construction Practice and Construction Method Statement required by Condition 32 of the s.73 permission. Operational impacts were identified as the potential increase in litter and public disturbance along the Ravensbourne and Quaggy River and disturbance to bats due to new lighting. Mitigation will be through on-site management measures.
- 7.174 The ECR notes that the specification of brown and green roofs to the development have the potential to increase the ecological value of the site to a range of species including invertebrates, bats and birds and these aspects of the proposals are supported.

Townscape and Visual Resources

- 7.175 The ECR states that although given the relatively short amount of time since the s.73 ESA there are no material changes to the receptors or the baseline conditions, the existing townscape at a site wide and localised scale has changed as a result of building and construction works during the course of 2018, including the continued construction of the Phase 1B development within the site. These works were under construction at the time of the s.73 ESA and were taken into account in the townscape and visual assessment at that time. The ECR states on completion the townscape would change however the effects would not be materially different from those previously assessed and Officers concur with that assessment.

Micro-Climate (Wind)

- 7.176 An updated wind tunnel assessment has been undertaken to provide quantification of the pedestrian level wind environment across the site and surrounding area at key locations, including pedestrian access routes, entrances to buildings and amenity areas. Minor amendments have been made to the scheme to improve the wind environment in certain locations such as recessing the residential entrance to Block D2. The ECR concludes that the detailed scheme is marginally beneficial in terms of micro-climate compared to the maximum parameters plan assessed in the s.73 ESA however there are a small number of locations where further mitigation is required and a condition is proposed to secure these details.

Daylight and Sunlight and Overshadowing

- 7.177 Daylight, sunlight and overshadowing to residential accommodation as well as to public and private amenity areas on and off site have been addressed elsewhere in this report. In terms of overshadowing of amenity areas, the impacts and effects were no greater than those of the approved s.73 scheme and changes to roof access to Block D2 and to the parapets of Blocks C and D1 have been incorporated within the reserved matters scheme to ensure the overshadowing impact to gardens of properties in Cressingham Road remains as the s.73 ESA.

Climate Change Resilience

- 7.178 The s.73 ESA included consideration of climate change resilience and mitigation. In terms of the construction stage, effects can arise through emissions associated with construction materials, traffic and plant and mitigation in terms of reducing greenhouse gas (GHG) emissions). Further information on building materials has enabled a reassessment of embodied carbon in construction materials which is estimated to be substantially less than that reported in the s.73 ESA. In terms of operational impacts these will arise from energy use associated with regulated uses (e.g. lighting, hot water, pumps/fans, space heating, cooling) as well as unregulated uses (e.g. cooking and appliances), and indirect emissions through the use of different transport modes through the provision of servicing, and waste disposal. In terms of regulated energy use, the proposed energy strategy has been considered elsewhere in this report. The impact of unregulated uses have been assessed by the Applicant to be negligible. As a car-free development transport impacts will be negligible and transport associated with waste collection will also be negligible.

Conclusion

- 7.179 The ECR has been reviewed by external consultants appointed by the Council who raised a number of points of clarification on the ECR. The Applicant has addressed these and it is considered that the ECR and clarifications document provide a full and appropriate assessment of the likely significant effects of the development. It is concluded that that the development will not give rise to new or materially different effects from those previously identified and that the mitigation identified in the s.73 ESA is still relevant. This mitigation is secured through conditions attached to the outline planning permission as well as in the detailed layout and design of the buildings and landscaping of the site.

Response to Objections

- 7.180 The majority of issues raised within objections relevant to this reserved matters application have been addressed within the relevant section of the report. In terms of other issues raised within objections, a response to these is set out below.

Mix of Uses

- 7.181 The Blackheath Society has made a number of comments relating to the mix of uses and compliance with the floorspace permitted under the original 2009 and 2018 s.73 permissions. This includes the overall quantum of residential and non-residential floorspace as well as the land use mix.
- 7.182 These matters were addressed as part of the s.73 minor material amendments application and permission was granted based on the revised land use mix. The Phase 2 reserved matters application is in accordance with the parameters of the 2018 s.73 permission in terms of the quantum of development and mix of uses.

Highways and Transport

- 7.183 A number of objections highlighted that the road layout at Lewisham Gateway is problematic, resulting in traffic congestion, impairing the movement of buses and taxis, and raising problems for cyclists. The highway layout has been previously approved and implemented, and the current Phase 2 reserved matters application does not present the opportunity to revisit this.
- 7.184 A number of objections have raised concerns regarding the capacity of public transport services to meet the demands of the proposed scale of development, particularly when taken together with the quantum of development which is being delivered or has been recently consented on surrounding sites. The maximum quantum of development for this site was approved as part of the 2018 s.73 permission which also secured £140,000 (index linked) for DLR capacity enhancements, and £300,000 (index linked) towards improvement works at Lewisham Station. The Council is working with partners to develop a programme of design works for Lewisham Station to improve connection and capacity. Lewisham Station remains high profile for Network Rail in terms of improvements and is identified as a Strategic Interchange in the Mayor's published Transport Strategy which identifies the need for major upgrades and more frequent rail connections.

Social Infrastructure

- 7.185 A number of objections have raised concerns that the proposed development, taken together with other developments coming forward within the surrounding area, will place an unacceptable burden of additional pressure on existing social infrastructure (such as schools, GP practices and healthcare provision). These matters were considered at the time of the s.73 application.

Provision of Community Space

- 7.186 A number of objections have noted that the proposed development does not provide any space which would be available for community events, activities or meetings. Given the additional number of residents that would be generated by the proposed development, taken together with other developments coming forward across the surrounding area, a number of respondents (including the Blackheath Society) consider that this represents a missed opportunity to provide a community

/ civic facility. The 2018 s.73 permission did not include provision of community space and the current reserved matters application is in accordance with the land use mix approved under the 2018 s.73 permission.

Flood Risk

7.187 A number of objections have raised concern that the proposed development will increase flood risk within the local area. The Environment Agency have been engaged throughout the scheme’s development, in relation to the river realignment works, flood risk and mitigation. In response to the s.73 application, the Environment Agency noted that there would be no change to fluvial flood risk as a result of the amendments.

Other Issues

7.188 One representation has highlighted concern about how access to the buildings would be afforded in the event of a fire, given their high rise nature. As set out above under ‘Servicing and Site Management’, retractable bollards will provide access for the emergency services to the public realm elements around the blocks, giving emergency personnel access to all blocks, firefighting lift shafts, and dry risers. The buildings have been designed to accord with all Building Regulation requirements in this regard.

8.0 Implementation

8.1 The Delivery Strategy which accompanied the s.73 minor material amendments application identified a construction programme of around three years to complete the buildings and to open all public routes through the site, with the delivery of Phase 2 undertaken as a single phase. The Phasing Details submitted alongside this reserved matters application reflect this, with works starting with the construction of Blocks D1, D2 and E, and with the construction of Block C following on in the second year. Works on Block D1 would complete in the second year whilst the remaining blocks would complete in the final year, as summarised in the table below.

Phase	Blocks	Construction Year	Anticipated Completion Date
2	Block C	2-3	Q3/Q4 2022
	Block D1	1-2	Q3/Q4 2021
	Block D2	1-3	Q3/Q4 2022
	Block E	1-3	Q3/Q4 2022

Phase 2 – proposed phasing

8.2 The principle of bringing forward the remaining elements of the site in a single phase seeks to expedite the completion of the Gateway development. This will reduce the period of further disruption for local residents and businesses and those who regularly visit and travel through Lewisham Town Centre, as well as bring forward the completion of the cinema and commercial floorspace and the residential accommodation. Construction logistics means that delivering the remaining elements as a single phase will prevent routes through the Phase 2 part

of the site being open to the public during the construction phase. Pedestrians and cyclists will therefore need to continue to travel around the site hoardings, using Station Road, Molesworth Street, Rennell Street and Lewisham High Street accordingly. Officers consider that there are clear benefits from delivering the construction in a single phase and thereby avoiding a protracted build programme likely to extend significantly beyond three years.

Management and Mitigation of Constructed Related Impacts

- 8.3 Condition 32 attached to the 2018 s.73 permission requires submission of a Code of Construction Practice and a Construction Method Statement (CCP&CMS) prior to the commencement of construction works for Phase 2. This includes arrangements obliging the developer and their respective contractors to use all reasonable endeavours to minimise disturbances including, but not limited to noise, vibration, dust and smoke emanating from the site including from construction vehicles. Related to this, Condition 33 requires submission of details of defined access routes to the site for all vehicular modes relating to the construction phase, and Condition 34 requires submission of details of the Air Pollution Risk Assessment (APRA) for Phase 2. The APRA is required to include arrangements obliging the developer and their respective contractors to implement the monitoring and control measures that correspond to the risk rating for the site, in accordance with the London Best Practice Guide.
- 8.4 Complementing this, Condition 59 requires submission of details of the total number of predicted HGV movements during the construction of Phase 2. Where this confirms that there would be more than 25 movements per day, it triggers the requirement for a quantitative air quality assessment of the construction phase, alongside details of any mitigation measures necessary to ensure that the impacts of the development remain within the parameters set out in the Environmental Assessment. Taken together it is considered that these requirements provide a robust mechanism to ensure that construction related impacts are appropriately managed and mitigated where practicable, thereby minimising impacts for occupiers of residential properties within the surrounding area.

9.0 CONCLUSION

- 9.1 Outline planning permission for the comprehensive mixed-use redevelopment of the application site was granted (subject to conditions and a s.106 agreement) in May 2009. In November 2018 the Council approved minor material amendments to that permission. The 2018 s.73 permission set the parameters for the scale and massing of the development, the quantum and mix of floorspace to be provided and the overall layout of the site. This current application is for the approval of reserved matters in respect of the layout, scale, appearance and landscaping of Phase 2 of the development granted outline permission in November 2018.
- 9.2 The reserved matters have been considered in the light of relevant policies and standards as well as representations from third parties. The reserved matters are in conformity with the approved development parameters for the scheme (scale, massing, floorspace, mix of uses, extent of public realm) and the submitted details satisfactorily address the relevant policy considerations. The Phase 2 reserved matters are also considered to be in accordance with the urban design principles set out in Strategic Site Allocation 6 in the Core Strategy and the Lewisham Town Centre Local Plan.

- 9.3 On balance, Officers consider that subject to the imposition of further conditions in respect of certain aspects of the development the reserved matters and related details are acceptable. On completion, the development will achieve a high quality development for this strategic site in Lewisham Town Centre, facilitating improvements in the integration and permeability across the town centre for pedestrians and cyclists, and with public transport services including the rail station, DLR station, and bus interchange services.
- 9.4 Consideration has been given to the objections made to the proposed development, as set out in this report. It is considered that none of the material objections outweigh the reasons for approving the reserved matters.

10.0 RECOMMENDATION (A)

GRANT APPROVAL FOR THE DISCHARGE OF CONDITION 2 (RESERVED MATTERS) subject to the following conditions:

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

Received 22 November 2018

AA5575-1150, AA5575-1151, AA5575-1152, 2.005 Rev A Site Elevations – North Elevation, 2.005 Rev A Site Elevations – West Elevation, AA5575-1200, AA5575-1201, AA5575-1202, AA5575-1203, AA5575-1205, AA5575-1206, AA5575-1207, AA5575-1208, AA5575-1209, AA5575-1210, AA5575-1211, AA5575-1212, AA5575-1600, AA5575-1601, AA5575-1602, AA5575-1603, AA5575-1604, AA5575-1610, AA5575-1611, AA5575-1612, AA5575-1613, AA5575-1614, AA5575-1615, AA5575-1616, AA5575-1617, AA5575-1618, AA5575-1619, AA5575-1650, AA5575-1700, AA5575-1701, AA5575-1702, 2.001 Rev B - Block C Full Elevations Set, 2.101 Rev A - Block C North Elevation, 2.102 Rev B - Block C East Elevation, 2.103 Rev A - Block C South Elevation, 2.104 Block C West Elevation, C-5.201 Rev A - Block C Elevation and Section Fragment Podium, C-5.202 Rev A - Block C Elevation Section Fragment Roof, C-5.203 Rev A - Block C Elevation Section Fragment Central, AA5575-1300, AA5575-1301, AA5575-1302, AA5575-1303, AA5575-1304, AA5575-1305, AA5575-1306, AA5575-1307, AA5575-1308, AA5575-1309, AA5575-1310, AA5575-1311, AA5575-1312, AA5575-1313, AA5575-1314, AA5575-1315, AA5575-1316, AA5575-1317, AA5575-1318, AA5575-1319, AA5575-1630, AA5575-1631, AA5575-1632, AA5575-1633, AA5575-1634, AA5575-1635, AA5575-1637, AA5575-1651, AA5575-1671, AA5575-1703, AA5575-1704, 2.002 Rev A - Block D1 Elevations Full Set, 2.105 Rev A - Block D1 North Elevation, 2.106 Rev A - Block D1 East Façade, 2.107 Rev A - Block D1 South Elevation, 2.108 Rev A - Block D1 West Elevation, D1-5.202 Rev A1 - Block D1 Elevation and Section Fragment Podium, D1-5.201 Rev A - Block D1 Elevation and Section Fragment Central, D1-5.203 Rev A - Block D1 Elevation and Section Roof, AA5575-1401, AA5575-1402, AA5575-1403, AA5575-1404, AA5575-1405, AA5575-1406, AA5575-1407, AA5575-1408, AA5575-1409, AA5575-1410, AA5575-1411, AA5575-1412, AA5575-1413, AA5575-1414, AA5575-1415, AA5575-1640, AA5575-1641, AA5575-1642, AA5575-1643, AA5575-1644, AA5575-1705, 5.201 Rev A - Block D2 Elevation Section Fragment Podium, 5.202 Rev A - Block D2 Elevation Section Fragment Roof, 5.203 Block D2 Elevation Section Fragment Central, AA5575-

1706, E-5.201 Block E Elevation and Section Fragment, Planning Conformity Statement (Quod, November 2018), Design and Access Statement (November 2018)

Received 18 December 2018

RMA Clarifications (December 2018)

Received 18 January 2019

AA5575-1170, AA5575-1171, AA5575-1172, AA5575-1173, AA5575-1204 Rev 1, AA5575-1670 Rev 1, AA5575-1680 Rev 2, AA5575-1695 Rev 1, AA5575-1636 Rev 2, AA5575-1681 Rev 2, AA5575-1696 Rev 1, AA5575-1400 Rev 2, AA5575-1672 Rev 2, AA5575-1682 Rev 3, AA5575-1697 Rev 1, AA5575-1500 Rev 1, AA5575-1501 Rev 1, AA5575-1502 Rev 1, AL5575-2101 Rev 1, AL5575-2103 Rev 1, RMA Clarifications (14 January 2019)

Received 24 January 2019

AA5575-1153 Rev 1, AA5575-1160 Rev 1, AA5575-1161 Rev 1, 2.005 Rev B - Site Elevations – East Elevation, 2.005 Rev B - Site Elevations – South Elevation, AA5575-1652 Rev 1, 2.003 Rev B - Block D2 Elevations Full Set, 2.109 Rev B - Block D2 North Elevation, 2.110 Rev B - Block D2 East Elevation, 2.111 Rev B - Block D2 South Elevation, 2.112 Rev B - Block D2 West Elevation, 2.004 Rev B - Block E Elevations Full Set, 2.113 Rev B - Block E North and East Elevations, 2.114 Rev B - Block E South and West Elevations, AL5575-2100 Rev 1, AL5575-2102 Rev 1, RMA Clarifications (22 January 2019)

Received 31 January 2019

AA5575-1200 Rev 1

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.

- (2) The reserved matters hereby approved shall not be implemented other than in accordance with the environmental standards and mitigation measures as set out in the Revised s.73 Environmental Statement Addendum (BWB Consulting, February 2018), the Environmental Conformity Report (BWB Consulting, November 2018) and the ECR Review Response Document (BWB Consulting, 17 January 2019) and these shall be maintained in that condition for the duration of the development.

Reason: To ensure the development is carried out in accordance with the Environmental Statement and the mitigation measures proposed therein.

- (3) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order) the occupiers of the two retail units shown on the approved plan (AA5575-1300) shall maintain public entrances on both the east

and west elevations. The dual public entrance / egress of the units shall be maintained as such for the duration of the development.

Reason: To ensure that the units afford an active frontage to both Molesworth Street and 'Retail Street' and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (2011) and Policy LTC14 of the Lewisham Town Centre Local Plan (2014).

- (4) The communal amenity space on the roof of the podium element of Block C shall be accessible and available for use by residential occupiers of Blocks C1 (co-living units), C2, D1 and D2 for the duration of the development.

Reason: In order that the local planning authority may be satisfied as to the amenity space provision in the scheme and to comply with Policy 3.6 Children and young people's play and informal recreation of the London Plan (2016), Policy 15 High quality design for Lewisham of the Core Strategy (2011) and DM Policy 32 Housing Design, layout and space standards of the Development Management Local Plan (2014).

- (5) Phase 2 of the development shall not be brought into use or occupied until a Detailed Servicing and Management Strategy (updating the approved Site Servicing and Management Strategy (February 2013)) has been submitted to and approved in writing by the local planning authority. The operation of all servicing and delivery activities shall be implemented in strict accordance with the approved Detailed Servicing and Management Strategy for the duration of the development.

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

- (6) Details of the provision of a Peregrine Falcon nest tray to the roof space of Block D2, together with the number and location of bird boxes to be provided as part of the development hereby approved, shall be submitted to and approved in writing by the local planning authority prior to commencement of above ground works for Phase 2, and shall be installed prior to first occupation of Building D2, and maintained for the duration of the development.

Reason: To comply with Policy 7.19 Biodiversity and access to nature conservation of the London Plan (2016), Policy 12 Open space and environmental assets of the Core Strategy (2011), and DM Policy 24 Biodiversity, living roofs and artificial playing pitches and local character of the Development Management Local Plan (2014).

- (7) Prior to first occupation of any building in Phase 2 details of the mitigation measures to achieve pedestrian comfort levels commensurate with the intended use at locations 110 and 111 of the Wind Microclimate Assessment (BRE, 9 January 2019) shall be submitted to and approved by the local planning authority. The measures as approved shall be implemented prior to first occupation and maintained for the duration of the development.

Reason: In order to ensure a suitable environment for visitors and residents and to accord with Core Strategy Policy 18 The location and design of tall buildings of the Core Strategy (2011).

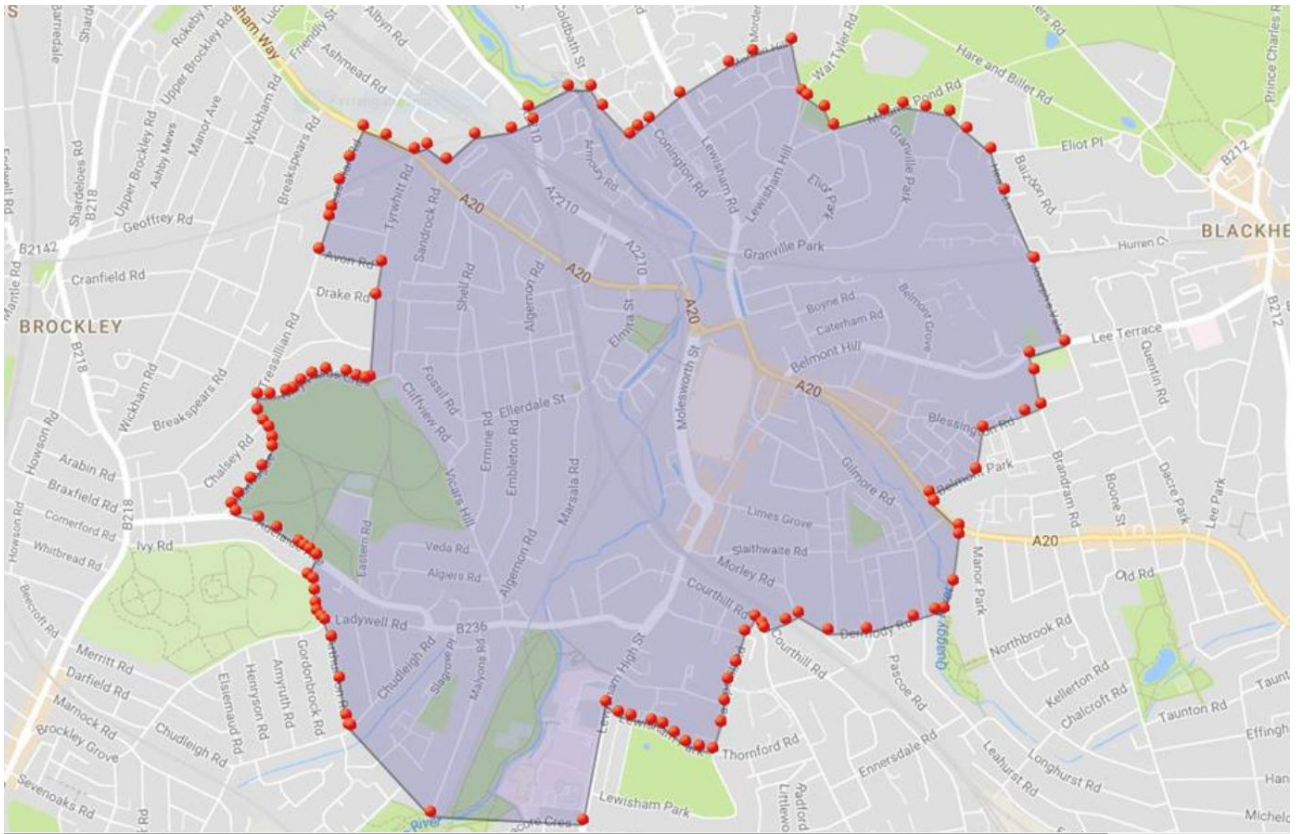
- (8) The location of the four Blue Badge parking spaces and electric vehicle charging points to each shall be in accordance with drawing AA5575-1200 Rev 1. The parking spaces and electric vehicle charging points shall be provided prior to first operational use of the service yard and shall be available for use and maintained for the duration of the development.

Reason: To reduce pollution emissions in an Air Quality Management Area in accordance with Policy 7.14 Improving air quality of the London Plan (2016) and DM Policy 29 Car parking of the Development Management Local Plan (November 2014).

INFORMATIVES

- (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 Council's website. On this particular application, positive and proactive discussions took place with the applicant prior to the application being submitted through pre-application discussions.
- (2) As you are aware the approved development is liable to pay the Community Infrastructure Levy (CIL) which will be payable on commencement of the development. An 'assumption of liability form' must be completed and before development commences you must submit a 'CIL Commencement Notice form' to the council. You should note that any claims for relief, where they apply, must be submitted and determined prior to commencement of the development. Failure to follow the CIL payment process may result in penalties. More information on CIL is available at: - <http://www.lewisham.gov.uk/myservices/planning/apply-for-planning-permission/application-process/Pages/Community-Infrastructure-Levy.aspx>
- (3) Please note the requirement to notify the Civil Aviation Authority in relation to the erection of any crane exceeding a height of 91.4m above ground level. The CAA's Airspace Regulation (AR) section should be contacted at E: ARops@caa.co.uk or T: 0207 453 6599. If the crane is to be in place for in excess of 90 days it should be considered a permanent structure and will need to be notified as such. Any crane of a height of 60m or more will need to be equipped with aviation warning lighting in line with CAA guidance concerning crane operations which is available at <https://publicapps.caa.co.uk/docs/33/CAP%201096%20In%20Focus%20-%20Crane%20Ops.pdf>

Appendix 1: Consultation Map



Appendix 2: Note of Public Drop-in Session (24 January 2019)

A public drop-in session was held from 6pm to 8.30pm on Thursday 24 January 2019 at Glass Mill Leisure Centre. All those who had submitted comments on the Phase 2 reserved matters planning application were invited to attend. A total of 10 local residents came along to the session during the course of the evening. A Council Officer was present and took notes of the comments made by attendees, and the responses given:

Proposed Uses

C: Support the provision of additional retail and food and drink uses, and the co-working space will provide opportunities for small businesses.

C: There is no community space provided within the proposed development. This is a missed opportunity to provide space for community meetings / events, recognising there is a shortage of such facilities locally. Is there potential for the meeting rooms within the co-working space to be used by community groups outside of working hours?

R: It was explained that the mix of uses was approved at the s.73 permission stage. In terms of the co-working space, it was explained that requiring community use of the facilities outside of working hours may prove challenging in terms of securing future operators for this space, and given the flexible nature of this proposed space and its need to respond to the demands of future business occupiers.

C: Support the proposed cinema, which will be a good facility for local people and help to develop the evening economy in Lewisham.

Design

C: The proposed materials are tawdry and brash, particularly the gold elements.

R: The design intent and rationale was explained by the scheme architects.

Microclimate

C: Concerned that the design of Block D1 will result in wind eddies along Molesworth Street, making this space uncomfortable for those waiting for buses at this location.

R: It was explained that the proposed development has been subject to wind tunnel testing and mitigation measures are proposed in terms of tree planting to address any wind impacts.

Public Realm

C: What will be the management and maintenance arrangements for the public realm?

R: It was explained that a management company will be responsible for the management and maintenance of the public realm and ensure that this is maintained to a high quality.

C: When will Confluence Place be open to the public?

R: Works are currently on-site to facilitate the creation of Confluence Place, and it is anticipated that the space will be complete in Spring 2019, with it opening for public access following this.

Impact of Construction Works

C: Concerns regarding the impact of construction activities in terms of noise and air quality for neighbouring residents, and how noise and air quality will be monitored during the construction phase.

C: During the construction of Phase 1 there were issues where the contractor did not effectively manage impacts for neighbouring properties – for example, a site generator was left running over the course of a weekend.

R: It was explained that there are a series of conditions attached to the s.73 permission which require submission of detailed arrangements relating to the mitigation of construction impacts, and require compliance with the approved measures. This will provide the mechanism to ensure that construction impacts are mitigated.

Other

C: Support the proposed development, it is about time that development on this site is completed.

C: When taken together with the other developments recently consented and coming forward (such as the proposed development at Conington Road), the development will flood the market with apartments for sale.

R: It was explained that the proposed units would be all be for rental, with none of the units in Phase 2 being for market sale.

C: The timing of the pedestrian crossings around the site needs to be looked at, as the lights stay red for too long (giving cars priority) and do not facilitate the effective movement of pedestrians through the area.

R: This lies outside the control of the applicant or the scope of this application, but the comments were noted and this would be raised with TfL / the Council's Highways Team to review.

C: The CGIs don't show other consented schemes within the surrounding area.

R: Noted that the CGIs do not show consented schemes, however whilst these may be consented schemes there is no certainty that they will necessarily be built out, and to include these schemes in the visualisations could risk criticism from the public that these have been shown to mitigate / reduce the impact of the proposed development which is the subject of the current reserved matters application.

C: London Living Rent is not affordable for Lewisham residents. The scheme should be delivering social rented housing.

R: It was explained that the housing tenure mix was approved as part of the s.73 permission.

C: Pleased that some of the apartments will be affordable tenure, at London Living Rent and so linked to the average local salary of Lewisham Central residents.

C: As residents of Phase 1, the completion of the development is welcomed as is the new retail space proposed.

Appendix 3: Report of the Council’s Appointed Independent Consultant Reviewing the Submitted Financial Viability Assessment

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DELIVERY | VIABILITY | CAPACITY

Lewisham Gateway, Lewisham SE13

Financial Viability Review Report – Reserved Matters Application

London Borough of Lewisham

January 2019

Private and Confidential

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1 INTRODUCTION

Background

- 1.1** Urban Delivery was instructed by the London Borough of Lewisham (the "Council") to assess a viability assessment provided by Lewisham Gateway Developments Limited (a subsidiary of Muse Developments Limited) (the "Applicant") in support of its Reserved Matters Application for Phase 2 of its development known as Lewisham Gateway in the centre of Lewisham town centre (the "Property" or "Site").
- 1.2** Outline planning permission for the development was granted in May 2009. With Phase 1 nearing completion, a S73 application was approved in 2018 for Phase 2 with the outline proposals allowing for the development of 474 new self-contained homes for private rental, 53 affordable homes at London Living Rent, 114 co-living units plus a mix of co-working office space, retail and leisure accommodation and public realm enhancements. This application was supported by a viability assessment prepared by the Applicant and reviewed by Urban Delivery, which found the provision of affordable housing to be the maximum that could reasonably be provided at the time.
- 1.3** The base financial model for the whole development assumed a developer's return of 15% profit on cost and 15% affordable housing with the level of provision determined at reserved matters stage and subject to viability. The Reserved Matters Application now proposes to provide 106 affordable homes as London Living Rent tenure, which reflects a proportion of 20% of all self-contained homes in Phase 2.
- 1.4** The purpose of this report is to provide guidance on the reasonableness of assumptions applied by the Applicant with regard to its Reserved Matters Application viability assessment for Phase 2 of the development scheme and to test whether it could be financially viable to provide additional affordable homes, in accordance with planning policy.
- 1.5** The advice provided in this report does not represent a Valuation in accordance with the RICS Valuation Global Standards 2017 (The Red Book), published by the

Royal Institution of Chartered Surveyors, and should not be regarded as such. The advice provided herein must only be regarded as an indication of potential value, on the basis that all assumptions are satisfied.

Conflict of Interests

- 1.6** We confirm that in providing this advice to the Council there is no conflict of interest between Urban Delivery and Lewisham Gateway Developments Limited or Muse Developments Limited.

Information Provided

- 1.7** In undertaking this review Urban Delivery has collected evidence from a number of third party sources. Urban Delivery cannot be held responsible for the accuracy of this data.
- 1.8** This report contains commercially sensitive information provided by the Applicant and the report must not be used by any person other than for whom it has been commissioned, without Urban Delivery's expressed permission. In any event, Urban Delivery accepts no liability for any costs, liabilities or losses as a result of the use of, or reliance upon, the contents of this report by any person other than the commissioner for planning purposes.
- 1.9** In undertaking the review of the Applicant's Reserved Matters Application viability report, Urban Delivery has been provided with the following information:
- a. A copy of the Applicant's draft viability report, prepared by Douglas Birt Consulting, dated December 2018. Within the appendices this includes:
 - i. A copy of the HCA Development Appraisal Toolkit, dated 17th December 2018.
 - ii. A copy of the updated cost summary and change tracker, prepared by Gardiner and Theobald (undated).
 - iii. A schedule of PRS rental values prepared by Savills (undated).
 - iv. A selection of rental evidence for co-living units, prepared by Doug Birt Consulting (undated).

- v. A schedule of rental values and investment yields relating to the commercial uses prepared by Lunson Mitchenall and dated June 2016.

2 PROJECT DETAILS

Location

- 2.1** The Site is located to the north of Lewisham town centre, adjacent to Lewisham DLR and mainline railway stations in south east London within the London Borough of Lewisham. The Site is situated to the north of the A20, which has been diverted around the southern boundary of the Site as part of the earlier phase works, which provides a direct route to other arterial routes and on to the wider motorway network.

The Site

- 2.2** The overall Lewisham Gateway Site extends to 5.6 hectares (13.8 acres), part of which formerly comprised a section of the main road network including the Lewisham Northern Roundabout and its various approach roads. As at the date of this report Phases 1, including three residential towers located to the north of the site, have been constructed. In addition, infrastructure works requiring the reconfiguration of the road network as well as the diversion of the Quaggy and Ravensbourne Rivers have been completed.
- 2.3** We have only inspected the Site from the road and surrounding public areas and have not undertaken any internal inspections or carried out any measured surveys. We are therefore reliant on the accuracy of the information provided by the Applicant and its advisers.

Development Overview

- 2.4** The subject of this viability review is a Reserved Matters Application following the approval of a S73 application in 2018 for minor material amendments to the existing planning permission for the comprehensive redevelopment of the Lewisham Gateway Site (Ref No: DC/06/62375, Dated 8th May 2009).

2.5 The approved S73 application proposed the following mix of land uses within Phase 2 of the proposed development:

- 33,958 sqm (NIA) residential accommodation, comprising;
 - 474 x Private Rental Units
 - 53 x Affordable Rental Units (LLR)
 - 114 x co-living Units
- 6,175 sqm (GIA) of retail accommodation (A1 and A3)
- 2,402 sqm (GIA) for a cinema
- 1,525 sqm (GIA) for a gymnasium
- 1,759 sqm (GIA) for office/co-working accommodation

2.6 The FVA for the Reserved Matters Application sets out a different mix of residential units, summarised in the below table:

Accommodation Type	S73 Proposal	Reserved Matters Application
PRS Units		
Studios (1P)	0	16
1 Bed Units (2P)	216	185
2 Bed Units (3P)	40	61
2 Bed Units (4P)	211	157
3 Bed Units (4P)	2	0
3 Bed Units (5P)	1	1
3 Bed Units (6P)	4	4
Total PRS Units	474	424
Co-Living Units		
Studios	56	119
1 Bed Units	58	0
Total Co-Living Units	114	119
LLR Units		
1 Bed Units (2P)	27	53
2 Bed Units (3P)	13	23

2 Bed Units (4P)	13	30
Total LLR Units	53	106

2.7 The Reserved Matters Financial Viability Assessment submitted by the Applicant indicates that the development proposal will now include 106 affordable homes to be offered at London Living Rental levels compared with only 53 affordable homes at the time the S73 application was submitted.

2.8 The Applicant’s Reserved Matters FVA identifies the total residential accommodation extends to 35,553 sqm (382,689 sqft) NIA. This is approximately 1,595 sqm (17,168 sqft) greater than the S73 FVA appraisals indicated.

2.9 The FVA for the Reserved Matters Application also sets out a different mix of commercial floor areas, summarised in the below table:

Accommodation Type	S73 Proposal (Sqm)	Reserved Matters Application (Sqm)
Retail (A1 and A3)	6,175	4,059
Cinema	2,402	2,322
Gym	1,525	1,481
Office / Co-Working	1,759	1,635
Total	11,861	9,497

2.10 We have therefore applied the Reserved Matters residential unit mix and commercial floor areas to our own appraisals.

2.11 Although current LB Lewisham planning policy requires 50% of all proposed dwellings to be provided as affordable housing, and the draft London Plan seeks 30% of homes built for private rent to be provided at London Living Rental levels, the S106 agreement for this project limits total provision to no more than 20% affordable housing (in acknowledgement of the high infrastructure costs in

delivering the whole development). The original S106 has a provision that the project is able to achieve a 15% return (profit on cost).

3 APPROACH TO VIABILITY APPRAISAL

Limitation of residual development appraisals

3.1 We have prepared a series of development appraisals using the industry standard Argus Developer software to appraise the project viability. Please note the following;

- Development appraisals are highly sensitive to their inputs (i.e. small changes in inputs can lead to a marked change in outputs).
- Development appraisals are required to assess viability as at today's date, which is reinforced in the RICS Financial Viability in Planning guidance note. They are permitted to factor in historic costs and also potential future market and cost inflation. However, this all needs to be considered as at today's date.

Approach to Appraisal

3.2 In undertaking a viability assessment for planning purposes Urban Delivery gives full consideration of the RICS Guidance Note 94/2012 (GN94) – Financial Viability in Planning. GN94 provides an objective methodology framework to support Affordable Housing viability assessment. The GN94 highlights that it is grounded in the statutory and regulatory planning regime that currently operates in England. GN94 concludes that the fundamental issue in considering viability assessments in a town planning context is whether an otherwise viable development is made unviable by the extent of planning obligations or other requirements.

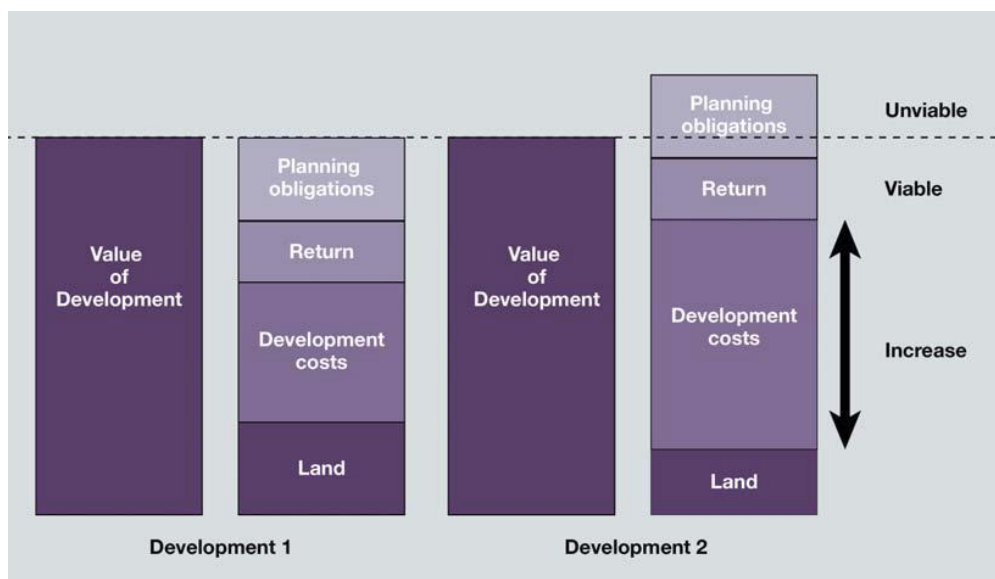
3.3 GN94 defines financial viability for planning purposes as follows:

“An objective financial viability test of the ability of a development project to meet its costs including the cost of planning obligations, while ensuring an appropriate Site Value for the landowner and a market risk adjusted return to the developer in delivering that project”.

- 3.4** GN94 proposes the use of a residual appraisal methodology for financial viability testing and that such a methodology is normally used, where either the level of return or site value can be an input and the consequential output (either a residual land value or return respectively) can be compared to a benchmark having regard to the market in order to assess the impact of planning obligations or policy implications on viability. GN94 defines site value as follows:

“Site Value should equate to the market value subject to the following assumption: that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan”.

- 3.5** It is accepted however that any assessment of site value will have regard to potential planning obligations, and the purpose of the viability appraisal is to assess the extent of these obligations while also having regard to the prevailing property market.
- 3.6** This principle is demonstrated by the diagram found in GN94. The costs and necessary returns of Development 1 are such that policy can be met in delivering all planning obligations while meeting a site value for the land, all other development costs and a market risk adjusted return. In contrast, Development 2 indicates that an increase in costs results in an inability of that development to absorb the original planning obligations and is therefore unviable. A financial viability assessment would be required to ascertain what could viably be delivered in the way of planning obligations while ensuring that the proposed development was viable and deliverable.



Source: RICS Guidance Note 94/2012.

3.7 While Urban Delivery acknowledges the RICS definition of Market Value as an appropriate basis to assess site value, this is currently under review and the NPPF and NPG advocates use of EUV+ to calculate site value. We would therefore typically adopt this approach.

3.8 For the purpose of this FVA Review however, the calculation of a site value is not necessary as both parties agree the site value is nil.

Residual Development Appraisal Assumptions

3.9 This viability assessment has been undertaken in accordance with the LB Lewisham’s Supplementary Planning Document (SPD) on Planning Obligations, adopted on the 25th February 2015. This includes guidance on financial viability assessments (paragraphs 4.31 to 4.38). This FVA review also gives consideration to the GLA Housing and Viability SPG, adopted in August 2017.

3.10 Our residual development appraisal has been prepared using Argus Developer, a recognised industry standard package that models individual development schemes and development phases. The model is based on costs and values adopted by the appraiser and can then be applied to a bespoke timeframe with assumptions on cost breakdown throughout the life of the project. This assumption on costs, revenues and the timing of such is then used to calculate finance costs.

- 3.11** In our residual development appraisal we have adopted our own assumptions on the amount and timing of income and expenditure, explaining why these differ from the Applicant's assumptions, if applicable. As part of our review we have examined all assumptions and formed our own independent view on whether these assumptions are applicable in the current market conditions.
- 3.12** We have appraised the development scheme as a single phase. We provide a copy of this appraisal in Appendix 1 and set out the revenue and cost assumptions adopted.

4 MARKET ANALYSIS

Local Property Market

4.1 Following the property market research undertaken in early 2018 for the S73 application FVA, we have reviewed the market evidence to verify the value assumptions included in the Applicants Reserved Matters Application FVA. This includes commercial property values and private residential rental values. On the basis that there is no private sale residential use proposed within Phase 2, we have excluded this from our updated research.

Residential Rental Values – PRS

4.2 Within the proposed Phase 2 development, a total of 294 dwellings within blocks C and D1 will be provided for private rent. We have therefore carried out research to identify likely rental values for these units. This has included a mix of independent private rented homes as well as purpose built rental blocks.

Fizzy Lewisham, SE13

4.3 Fizzy Living currently has two blocks within the Lewisham Gateway development and has been actively marketing one and two bedroom units to let. We provide summary rental information in the table below for typical unfurnished apartments.

Fizzy Lewisham, Lewisham Gateway, SE13				
No Beds	Area sq m	Area sq ft	Monthly Rent	£psf/pa
1	54.0	581	£1,595	£32.93
1	51.8	558	£1,610	£34.65
2	71.7	772	£1,790	£27.83
2	71.7	772	£1,900	£29.54
Average	62.3	671	£1,724	£30.85

4.4 The rental figures presented in the above table reflect the lower rental ranges and as such it is likely the average monthly unit rental would exceed £1,700 per dwelling and a value of £332 per sqm (£30.85 per sq ft) per annum.

L&Q, Thurston Point, Lewisham, SE13

4.5 Within L&Q’s development at Thurston Point in Lewisham, we understand that there are a total of 238 private rental units providing a mix of studios, one, two and three bedroom apartments. We are advised that availability is limited and units are in high demand. We set out a summary of the average units in the table below.

L&Q - Thurston Point, Lewisham, SE13				
No Beds	Area sq m	Area sq ft	Monthly Rent	£psf/pa
Studio	32.1	345	£1,050	£36.52
1	44.0	474	£1,275	£32.28
2	60.3	649	£1,450	£26.81
3	69.6	749	£2,500	£40.05
Average	58.0	554	£1,569	£33.96

4.6 The rental figures presented in the above table reflect only a selection of units and can vary in size and unit rent. As such it is likely the average rental value will range from £323 to £430 per sqm (£30 to £40 per sq ft) per annum.

Other Private Rental Values, SE13

4.7 A review of rental asking prices and agreed lets for independent rental units within standard residential blocks indicates that rental values can range depending on location and quality of amenity. We set out the indicative range for one, two and three bedroom apartments below:

- Studio @ £825 to £1,150 per month
- 1 bed @ £1,250 to £1,450 per month
- 2 bed @ £1,500 to £1,650 per month
- 3 bed @ £1,650 to £2,000 per month

4.8 Based on the current average rental figures above and assuming an average size for each of the studio, one, two and three bedroom units, we estimate that an average rental value would be in the order of £253 to £458 per sq m (£24 to £42 per sq ft) per annum. The wide range is attributed to the difference in floor areas between studio to 3 bedroom units.

- 4.9** It should be noted that a purpose built rental block with on-site amenities designed for the rental sector should be able to achieve a premium over stand-alone rental units in mixed-tenure developments.

Residential Rental Values – Co-living Units

- 4.10** Co-living is a relatively niche sector, albeit set to grow in popularity over the next few years. There remain limited examples currently available for the professional sector. The perceived benefit of co-living accommodation is that despite analysis indicating it can cost the resident more on a £/sqm (£/sqft) basis, it offers more affordable accommodation overall than a standard apartment.

The Collective, Old Oak, NW10

- 4.11** The Collective at Old Oak is advertised as the largest co-living building in the world, including 535 bed spaces across shared clusters, studio and en-suite units. The building is located approximately 10km to the north west of Lewisham and while in a different area of London, it represents the concept of co-living and can provide an indication of the rents and revenues to be achieved. In addition to bed spaces, the facility includes communal lounge, cinema room, library, laundry facilities, gym, coffee shop, restaurant, outside space and roof terrace. The unit type and rents are understood to comprise the following:

- Studio room (Premium): £290 per week
- Shared en-suite/Kitchen: £245 per week

- 4.12** The actual weekly rent will vary depending on contract term. Longer term tenancies attract a discount over shorter tenancies. We are advised the above figures are for longer term tenancies and therefore reflect the lower end of the price range. Marketing details for this site indicate that the rent includes bi-weekly cleaning, linen change, WiFi, concierge service, on-site maintenance and use of the gym.

The Collective, Acton Town, W3

4.13 The Collective at Acton includes 26 En-suite bedrooms and 17 studio rooms. Facilities include concierge, communal lounge, laundry facilities and car parking. The unit type and rents are understood to comprise the following:

- En-suite room: £250 per week
- Studio room: £290 per week

4.14 This development is smaller than that proposed at Lewisham Gateway but provides a good indication of achievable weekly rents based on room types, facilities and distance from central London.

Residential Rental Values – Affordable Housing

4.15 The proposed affordable homes within Phase 2 will be provided at London Living Rent (LLR). The monthly rental levels for this tenure is published by the GLA and is subject to unit type and council ward. The proposed scheme is located within Lewisham Central, for which the monthly rental levels are currently as stated below:

- 1 bed @ £879 per month
- 2 bed @ £977 per month

4.16 These rental values would be expected to be the maximum rent receivable for the on-site affordable homes.

Commercial Values

4.17 Within the development appraisal a number of different land uses are proposed including A1 and A3 retail, cinema, offices and a gym. While we have reviewed the local property market there is very little evidence recorded on any new transactions since the S73 application FVA review. We summarise this further below.

Retail

4.18 Thurston Point, situated on the western side of Lewisham railway station comprises a mixed-use development by L&Q and Ashford Developments. The development includes an Asda supermarket, gym and six retail units. Previous discussion with

the letting agent revealed that asking rents for the unlet retail units had been reduced from £269 to £162 per sqm (£25 to £15 per sq ft).

- 4.19** The development was originally pre-let to Asda and The Gym Group with unit 3, extending to 284 sqm (3,055 sq ft), having been leased to Screwfix in late 2016 at a rent reflecting £269 per sqm (£25 per sq ft). Unit 3 was let on a shell and core basis and a rent free period was agreed to cover the cost of fit out. In 2017, unit 7 was leased to More Yoga at a rent reflecting £269 per sqm (£25 per sq ft).
- 4.20** On the opposite side of Loampit Vale, there are a range of retail units within Barratt's Renaissance development. While a number of these remain vacant, the asking rents reflect a value of circa £269 per sqm (£25 per sq ft). However, we note the marketing agent is now seeking to dispose of these via long leasehold sale rather than letting with prices sought in the region of £300,000. This would reflect a capital value of c.£2,336 per sq m (£217 per sq ft).
- 4.21** The corner unit, owned by the Council, was let to Explore Learning on a 15 year lease, commencing in March 2017, at a rent reflecting £290 per sqm (£27 per sq ft). We were advised previously that a 12 month rent free period was agreed.
- 4.22** With regard to investment transactions, we are not aware of any significant deals in the local area and are of the opinion sentiment will not have changed materially since the S73 FVA review in early 2018.
- 4.23** As reported previously, we are aware that in December 2016, Knight Frank Investment Management exchanged contracts to acquire the Asda and Gym Group buildings on the Thurston Point development, from Ashford Developments. The price is understood to have been £13,700,000 which reflects a blended yield of 4.85%. Analysing this deal, we would anticipate the individual yields would reflect a greater investment value for the Asda foodstore and a higher yield for the gym. The approximate rental income from the two units is estimated to be £703,000 per annum, of which Asda accounts for around 73% of this revenue. On this basis, applying a yield of circa 4.75% to the Asda unit, the gym would be attributed a yield of circa 6.25%.

4.24 Assuming that the retail space within the proposed development is likely to be let to a mix of national retailers, attracted by the proximity to the cinema, we anticipate covenants to be relatively strong and would therefore expect the completed units, once let, to achieve yields in the range of 6.25% to 6.75%.

Cinema

4.25 Information for new cinema lettings is limited with operators treating new lease terms in confidence. Our updated research has not revealed any new letting information since the S73 FVA review.

4.26 In early 2014, London Metric Property acquired the freehold interest in the Odeon Cinema premises on Finchley Road in Swiss Cottage. The agreed price was £4,780,000 and reported to reflect a yield of 7.13%. We have calculated that the passing rent at the time would have been in the order of £340,000 per annum. While floor areas are not available for this property, we understand that the cinema comprises five screens and 671 seats. This reflects a rental of £507 per seat or £68,000 per screen and a capital value of £7,124 per seat and £956,000 per screen.

4.27 In November 2013, two Odeon cinema premises in Richmond in south west London were sold for a sum in the order of £12,140,000 reflecting a yield of 4.75%. At the date of the sale there was an unexpired term of 18 years on the lease and the passing rent equated to £227 per sqm (£21.10 per sq ft) although an RPI index linked rent review was due in 2014, potentially impacting on the level of the yield achieved. The guide price prior to the sale reflected a yield of 5.75%.

4.28 In December 2012, Vue Cinema took a lease on a new cinema premises in Shortlands, near to Bromley. The premises was reported to extend to 2,415 sqm (25,995 sq ft). The agreed rent was £455,000 and reflects a rent of £188 per sqm (£17.50 per sq ft).

4.29 Outside of London, but situated in the centre of the cathedral city of Canterbury in Kent, a two screen cinema leased to ABC (guaranteed by Odeon) for a 25 year term

up to 2032, sold in May 2016 for a price of £2,790,000 reflecting a yield of 6.38%. The passing rent of £178,026 is subject to RPI uplifts of between 1% and 5% and currently equates to £84.60 per sqm (£7.85 per sq ft). Given the location we would anticipate the rental value for the proposed cinema unit would significantly exceed the figure indicated by this evidence, however, we are of the opinion the achieved yield reflects the demand for secure cinema related property investment.

- 4.30** Based on the limited evidence available we remain of the view that rental values for cinema premises are stable and would expect a new multi-screen cinema in the centre of Lewisham to achieve a rental value equivalent to £193 to £215 per sqm (£18 to £20 per sq ft) and to reflect an investment yield of between 5.75% and 6.50%.

Offices and Co-working

- 4.31** The trend for co-working offices continues to increase with specialist operators continuing to expand in the UK. Co-working can be described as a style of work that involves a shared working environment, often an office, and independent activity. Typically, co-working offices are attractive to early stage companies, work-at-home professionals, independent contractors, or people who travel frequently who end up working in relative isolation. Increasingly, co-working is also attractive to more established companies and their employees who want to spend some of their time working within spaces where there are increased opportunities for networking, collaboration, or amenities beyond what is available in their normal place of work.
- 4.32** UK demand for office space from co-working providers is projected to increase significantly over the next decade. With self-employment forecast to increase by 15% over the next decade and micro businesses now representing 96% of all UK business, with a further 1.1m new micro businesses predicted by 2024, demand for flexible working environments is predicted to increase.
- 4.33** Evidence of co-working office transactions is limited with values intrinsically linked with the actual or projected revenue streams that can be generated as part of the

operating business. For the purpose of this FVA review it is assumed that an operator may lease the office space from the Applicant to set up and operate a co-working facility. On this assumption, the value attributed to the co-working space would be in line with office values elsewhere in Lewisham, although a co-working operator may be able to pay a premium rent where the business model perceives the potential for greater margins to be achieved and may out-bid standard office occupiers to lease the space to set up such an operation.

- 4.34** While we have undertaken a review of the local office property market there are few changes to the trends that we reported as part of the S73 FVA review in early 2018. We set out the evidence below of which we are currently aware.

Unit 1, 52-54 Thurston Road, SE13

- 4.35** The unit comprises a 92 sqm (990 sq ft) office premises over ground and mezzanine level within a new development to the west of Lewisham station. We understand that the unit was let to JBS Solicitors Ltd in August 2016, for a term of five years at a rent of £18,000 pa. This reflects a rental rate of c.£195 per sqm (£18.18 per sq ft). It is understood the asking rent was £20,000 and that there will be a rent review after three years.

Unit D, Silkworks, Conington Road, SE13

- 4.36** The unit comprises a 96 sqm (1,029 sq ft) office premises over ground level within a recent development to the northeast of Lewisham town centre. We understand that the unit was let in May 2015 at a rent of £18,000 pa. This reflects a rental rate of c.£188 per sqm (£17.50 per sq ft).

Unit 1, 52-54 Thurston Road, SE13

- 4.37** This unit (referred to above) comprises a 92 sqm (990 sq ft) office premises over ground and mezzanine level within a new development to the west of Lewisham station. We understand that the unit was sold to Fuse Pension Fund in April 2016, for a sum of £165,000. This sale pre-dates the letting to JBS Solicitors Ltd but adopting the estimated rental value would have reflected a net investment yield of circa 11.75%. This level of yield reflects the vacant possession at the time of the

acquisition and had it been let, may have been reduced to reflect the lower investment risk.

Unit 2, 52-54 Thurston Road, SE13

- 4.38** This unit comprises a 69 sqm (738 sq ft) office premises over ground level within a new development to the west of Lewisham station. We understand that the unit was sold to Frank Metier LLP in November 2016, for a sum of £167,000. This sale reflects a capital value of £2,435 per sqm (£226 per sq ft).

Unit 3, 52-54 Thurston Road, SE13

- 4.39** This unit comprises a 75 sqm (807 sq ft) office premises over ground level within a new development to the west of Lewisham station. We understand that the unit was sold to a private party in October 2016, for a sum of £180,000. This sale reflects a capital value of £2,400 per sqm (£223 per sq ft). This unit is reported to have been let in December 2017 at a rent reflecting £176 per sqm (£16.40 per sq ft).
- 4.40** As stated above, there is a limited volume of transactional evidence for comparable office accommodation to rely on and the evidence above is for accommodation located more to the periphery of the town centre. As such, we would expect rental values for prime office space close to Lewisham station and the town centre to achieve a greater value than many of the above transactions indicate. We would expect the proposed office accommodation to achieve rental values in the order of £215 to £269 per sqm (£20 to £25 per sq ft).
- 4.41** With capital values for the evidenced transactions at between £1,794 and £2,432 per sqm (£167 and £226 per sq ft) and rental values in the order of £172 to £194 per sqm (£16 to £18 per sq ft) the equivalent yield would be in the order of 7.00%, depending on the covenant strength and lease terms of the eventual occupiers. We note that the Applicant has adopted a yield of 5.25% in its FVA which we believe reflects a prime investment opportunity and would be dependent on a letting to an occupier with a strong covenant.

Gym

- 4.42** We have reviewed the local property market for evidence of leisure transactions, including gym premises, since the S73 application FVA review. There has been no new transactional evidence and we have therefore relied upon evidence reported previously.
- 4.43** In July 2017, Ovalhouse Limited, trading as Soho Gyms agreed a lease for a term of 20 years on 1,412 sqm (15,198 sq ft) of refurbished space within 65-71 Lewisham High Street, SE13. The lease allows for five year RPI linked rent reviews capped at 4% and collared at 2% with the initial rent of £175,000 per annum reflecting a rate of £124 per sqm (£11.51 per sq ft). A 12 month rent free period was agreed between parties. The 999 year long leasehold interest in this premises is currently being marketed with offers sought in excess of £2,950,000 which would reflect a net initial yield of 5.57%.
- 4.44** As referred to above, within the Thurston Point development by L&Q and Ashford Developments, The Gym Group had pre-leased a 1,533 sqm (16,500 sq ft) premises on a 15 year term. Discussion with the letting agent confirmed that the agreed rent equates to £121 per sqm (£11.25 per sq ft) and that a 15 month rent free period was granted to assist with the cost of fit-out. This deal was agreed nearly two years ago. When discussed with the letting agent, he was of the view that the same deal agreed today could potentially achieve a greater rental level in the order of £150 per sqm (£14 per sq ft).
- 4.45** In September 2016, Pure Gym agreed a lease for a term of 20 years on 1,110 sqm (11,945 sq ft) of second-hand accommodation at 315-317 Camberwell New Road, SE5, approximately 5.5km to the west of the subject Site. The agreed rent of £140,000 per annum reflects a rate of £126 per sqm (£11.72 per sq ft). The rent reviews are RPI linked, capped at 4% and collared at 1%. A six month rent free period was agreed between parties. This property was subsequently sold in Q4 of 2016 at a price reflecting a net initial yield of 6.24%.

- 4.46** In March 2016, Flow Dance London agreed a lease for a term of 10 years on 379 sq m (4,080 sq ft) of D2 assembly and leisure accommodation at 1-3 Brixton Road in Oval, SE9, approximately 6.9km to the northwest of the subject Site. The agreed rent of £61,500 per annum reflects a rate of £162 per sqm (£15.07 per sq ft). A three month rent free period was agreed between parties. Based on location and the smaller floor area of this unit, we would not expect the subject Property to achieve as high a rental value as this evidence indicates.
- 4.47** In September 2015, Pure Gym acquired the freehold interest in 242 Shepherds Bush Road in West London, approximately 14km to the northwest of the subject Site. The premises extend to 2,029 sq m (21,840 sq ft). The acquisition price was reported to be circa £10,783,000, which reflects a capital value of £5,314 per sqm (£493 per sq ft).
- 4.48** In September 2016, the Virgin Active gym on Worple Road in Wimbledon was acquired by KFIM Long Income Property Unit Trust for the sum of £6,800,000. The premises extend to 2,624 sqm (28,243 sq ft) and was reported to be generating a rent of £398,317 per annum. Based on these figures the rent reflects around £151 per sqm (£14.10 per sq ft) and the investment yield is calculated to be in the order of 5.50%. Given the quality of covenant and location we would expect this evidence to represent a superior investment opportunity than the subject Property.
- 4.49** More historic data on gym transactions includes the Virgin Active gyms at 108-110 Cricklewood Lane, NW2 and Unit 13, Smugglers Way, SW18. These two facilities sold in February 2014 and July 2013 respectively, achieving investment yields of between 4.93% and 6.13%. Both were sold with long unexpired terms remaining on the leases.
- 4.50** Based on the evidence available for gym transactions, we would expect the proposed leisure accommodation to achieve rental values in the order of £129 to £172 per sqm (£12 to £16 per sq ft) and depending on covenant, achieve an investment yield of between 6.25% to 6.75%. It is noted the Applicant's FVA adopts a rental value of £205 per sqm (£19 per sq ft) and a yield of 6.75%.

5 VIABILITY ASSESSMENT REVIEW

Land Value

- 5.1** It is our understanding that the land has been provided at nil cost by the Council and other public sector parties.

Appraisal Inputs

Private Rented Sector Revenue

- 5.2** The Applicant's FVA identifies that 424 homes will be provided as private rented sector units (PRS). The revenue attributed to these units has been based of an average rental value for each unit type with monthly rents ranging from £1,491 for a studio flat to £2,400 for a three bed flat. The average rent per sqm (sq ft) is calculated to be in the order of £336 per sqm (£31.23 per sq ft). This has increased from £324 per sqm (£30.15 per sq ft) for the S73 application FVA. Discounts are applied to cover rental voids equivalent to 5% of annual rent and management and maintenance costs equivalent to 20% of the gross rental income. We understand this is based on advice received from its commercial advisers and the direct experience currently derived from Fizzy Living's management of the PRS units in phase 1. This is considered to be an acceptable management charge.
- 5.3** The Applicant has applied an investment yield of 4.00% in order to calculate the capital value for this element of the development. This is unchanged from the S73 application FVA. While evidence of transactions is limited, we are of the opinion this level of yield and investment return is acceptable.
- 5.4** Having reviewed the local rental market, including rents currently being charged by the operator, Fizzy Living, within the Phase 1 development for unfurnished units, as well as L&Q's PRS scheme nearby, we are of the opinion that these assumptions are reasonable. We have therefore adopted these values and cost assumptions to our own appraisal.

Co-living Revenue

- 5.5** The Applicant is proposing that 119 homes will be provided as co-living studio units. This has increased from 114 units at the date of the S73 application FVA which included 58 one bed cluster flats with shared kitchens and bathrooms and 56 studio flats. The revenue we have attributed to these units has been based of an average rental value for studio units with weekly rents of £290. This unit rental value is unchanged from the S73 application FVA assumption regarding co-living studio units. The average rent per sqm (sq ft) is calculated to be in the order of £580 per sqm (£53.88 per sq ft) which reflects an increase from £522 per sqm (£48.50 per sq ft) at the date of the S73 application FVA. The increase in £/sqm is attributed to the same unit rent being applied to a smaller average unit size. The same discounts are applied to cover rental voids and management and maintenance costs as applied to the PRS units of 25%.
- 5.6** The Applicant has applied an investment yield of 4.00% in order to calculate the capital value for this element of the development. This is unchanged from the S73 application FVA. While evidence of transactions is limited, we are of the opinion this level of yield and investment return is acceptable.

Affordable Housing Revenue (London Living Rent)

- 5.7** The Applicant is proposing that 106 homes will be provided as affordable housing with the units offered at London Living Rent. This reflects an increase from 53 at the date of the S73 application FVA.
- 5.8** The revenue attributed to these units within the Applicant's FVA is based on the figures adopted as at the date of the S73 application FVA and increased in line with CPI. However, proposed LLR rates are published by the GLA and the difference between 2018 and 2019 rates for Lewisham Central Ward are negligible. For the purpose of this FVA review we have adopted the values suggested by the Applicant. Discounts are applied to the gross rent to cover management and maintenance costs equivalent to 28% of the gross rental income, which is in line with allowances other Registered Providers have made for the management of rented tenure affordable housing.

- 5.9** The Applicant has applied an investment yield of 4.00% in order to calculate the capital value for this element of the development. This is unchanged from the S73 application FVA. We are of the opinion this level of yield and investment return is acceptable.

Commercial Revenue – Retail Uses

- 5.10** The Applicant has applied a rental value to the proposed retail accommodation of £334 per sq m (£31 per sq ft) and an investment yield of 6.50%. This is unchanged from the S73 application FVA. Our own review of the local retail property market has identified that the deals completed within the new build schemes close to the subject Property are typically lower than suggested by the Applicant.
- 5.11** The evidence for retail transactions set out in section 4 of this report include accommodation within the Renaissance scheme and Thurston Point, close to Lewisham Gateway. This evidence indicates rental values equivalent to £161 to £269 per sqm (£15 to £25 per sq ft). However, these premises are located off-pitch compared with the proposed development at Lewisham Gateway which could therefore achieve greater value. For the purpose of this FVA review we have therefore adopted the rental values applied by the Applicant.
- 5.12** The Applicant has applied a yield of 6.50% to the retail uses. This is unchanged from the S73 application FVA. The selection of yield reflects the current position where no pre-lets have been agreed with tenants. Once lettings are agreed, depending on the covenant strength, there is potential for yields to reduce and lead to a greater capital value. For the purpose of this FVA review, we are of the opinion this yield is reasonable.

Commercial Revenue – Cinema Use

- 5.13** The Applicant has applied a rental value to the cinema accommodation of £205 per sqm (£19 per sq ft) and a yield of 6.00%. This is unchanged from the S73 application FVA.

5.14 Based on the evidence available for cinema transactions, we are of the opinion the proposed rental value and investment yield is reasonable. It should be noted that the delivery of the cinema unit is likely to influence the successful letting of the A3 retail units. A delay in delivering the cinema could result in the inability to sign up a mainstream operator and therefore impact on the achievable rental value as well as negatively affect the value of the retail uses, which would negatively impact on viability.

Commercial Revenue – Co-working Offices

5.15 The Applicant has applied a rental value to the office accommodation of £344 per sqm (£31.95 per sq ft) and a yield of 5.25%. This is unchanged from the S73 application FVA.

5.16 We have attributed a rental value based on local office rents. The evidence for office transactions set out in section 4 of this report include accommodation within the new developments on Thurston Road and at Thurston Point, close to Lewisham Gateway. This evidence indicates rental values equivalent to £172 to £194 per sqm (£16 to £18 per sq ft). However, these office units are located off-pitch compared with the proposed development at Lewisham Gateway and it is feasible that rental values within the proposed development could achieve a premium. For the purpose of this FVA review we have therefore adopted the rental values applied by the Applicant.

5.17 With regard to investment yield, the evidence of investment transactions is limited but our analysis of sales would suggest yields in the order of 7.00%, depending on the covenant strength and lease terms of the eventual occupiers. We are of the opinion that the yield applied by the Applicant reflects a prime investment opportunity and would be dependent on a letting to an occupier with a strong covenant. For the purpose of this FVA review, we have adopted the Applicant's assumed yield of 5.25%.

Commercial Revenue – Gym Use

- 5.18** The Applicant has applied a rental value to the gym accommodation of £205 per sqm (£19 per sq ft) and a yield of 6.75%. This is unchanged from the S73 application FVA.
- 5.19** Our review of the local property market for gym uses suggests that the Applicant's assumed rental value is at the higher end of the range for what could be achieved at the current time. We would therefore accept the rental assumptions adopted within the Applicant's FVA report. We are of the opinion that the yield adopted by the Applicant of 6.75% is reasonable at the current time where no pre-let has been agreed.

Grant Funds

- 5.20** We understand that, to date, total public sector funding (provided by the Council, the HCA and GLA in the form of grants or loans) for the whole development amounts to around £21,900,000.
- 5.21** Following the award of Housing Infrastructure Funds (HIF) in early February 2018, a sum of £10,000,000 has now been awarded to the Lewisham Gateway project. We have therefore applied this funding to our own appraisals. In this appraisal a total of £19,558,850 has been included to cover public sector funding.

Tenant Incentives

- 5.22** The Applicant has included a capital contribution of £1,400,000 towards the fit-out of the proposed cinema. This is unchanged from the S73 application FVA. Based on our past involvement in other mixed-use developments in which cinemas have formed an integral element, we can confirm that landlord contributions of this magnitude are often provided to a cinema operator to agree a letting and assist with start-up costs. We are therefore of the opinion that it is acceptable to include this contribution within the viability assessment.

- 5.23** A financial contribution of £50,000 has also been included in respect to the proposed gym use. Again, we would accept that this level of financial contribution is reasonable to secure a tenant and to assist with fit-out costs. This is unchanged from the S73 application FVA.

Purchasers Costs

- 5.24** With regard to the sale of the property investment elements of the scheme, which includes the sale of the PRS units, we have applied a purchaser's cost equivalent to 5.75% of the GDV. This reflects a purchaser's obligation to pay Stamp Duty Land Tax plus agency and legal fees.

Construction Costs

- 5.25** The Applicant's financial viability appraisal comprises a mix of development costs including construction of the Phase 2 buildings, phase specific infrastructure costs as well as an apportionment of side wide infrastructure costs relevant to the delivery of the whole project.
- 5.26** It is our understanding from the Applicant that the cost summary has been prepared and updated by Gardiner & Theobald with input from the contractor to allow for actual cost allowances for specified elements. At the time of preparing this report this cost summary has not been verified by an independent quantity surveyor. In addition to more specific costs being provided by a contractor it is noted that the BCIS All-in Tender Index has increased from Q1 2018 to Q1 2019 by 0.9%.
- 5.27** An informal review of the Gardiner & Theobald cost summary by Urban Delivery identifies that costs have increased from the S73 application FVA of £185,741,000 to a current construction cost estimate of approximately £201,206,000. The main differences are set out in the table below:

Cost Element	S73 Application	Reserved Matters Application	Variance
Shell & Core (Block C)	£27,457,000	£27,815,000	+£358,000
Fit-out Co-Living (Block C)	£4,547,000	£5,352,000	+£805,000
Shell & Core (Block E)	£4,240,000	£4,421,000	+£181,000
Fit-out: CAT A (Block E)	£627,000	£478,000	-£149,000
Main Contractor On-Costs	£32,838,000	£33,711,000	+£873,000
Misc Costs	£2,736,000	£1,736,000	-£1,000,000
Get Living Changes - Incorporated	N/A	£4,723,000	+£4,723,000
LDGL Design Changes	N/A	£1,205,000	+£1,205,000
Get Living Changes - Future	N/A	£1,025,000	+£1,205,000
Inflation	£4,769,000	£5,216,253	+£447,253
Fixed Price Adjustment	N/A	£6,548,668	+£6,548,668
Estimated Non-recoverable VAT	Excluded	£448,000	+£448,000
Total Cost Estimate	£185,741,000	£201,205,921	+£15,464,921

5.28 We have therefore applied the updated cost estimates to our own appraisal for the purpose of this FVA review. It is anticipated that actual costs will be available at the time of the next FVA review.

Additional Construction Cost Items

5.29 The Applicant's FVA report It has included additional costs that are referred to as 'Site-wide Costs' and 'Phase 2 Specific Costs'. The Site-wide Costs comprise a

combination of development costs associated with the project as a whole and have been apportioned on a 66.6%/33.3% ratio between Phase 1 and Phase 2 respectively.

5.30 The Phase 2 Specific Costs comprise a mix of costs attributed to items such as Rights of Light, S278 Bonds, Lane Rental Charges and costs associated with an on-going legal dispute. These costs total £2,300,000. These attributed costs are unchanged from the S73 application FVA.

5.31 Based on commercially sensitive information made available to Urban Delivery previously we conclude that the costs presented by the Applicant are genuine and acceptable to include in this viability assessment.

S106 and CIL Contributions

5.32 We have applied an overall CIL contribution to our appraisal of £182,555. This figure is based on the revised floor areas and increase in provision of LLR units.

5.33 The S106 agreement entered into in respect to the S73 application sets out the following financial contributions:

• DLR Contribution:	£140,000
• Financial Contribution:	£500,000
• Lewisham Station:	£300,000
• Council Monitoring:	£30,000
• Additional Staff Resource:	£100,000
Total:	£1,070,000

5.34 We have included these costs within our appraisal. We have also included a carbon off-setting contribution of £637,300 based on current £/tonne of Co₂ rates.

Professional Fees

5.35 The Applicant has adopted an average cost for professional fees reflecting 10% of construction costs. Additionally, the development agreement permits the developer to charge up to 4% for project management costs, although we are advised the

Applicant is applying a figure of only 3%. These are unchanged from the S73 application FVA.

- 5.36** For a new scheme, depending on scale and complexity, we would ordinarily allow for fees in the order of 10% to 12% of build costs. On the basis that this proposed development is part of a comprehensive regeneration scheme with highway and service diversions we would typically adopt a fee rate towards the higher end of this range. With an additional allowance of up to 4% for project management fees, we are of the opinion that an average fee cost equivalent to 13% of build costs is acceptable. We have therefore adopted a rate of 13% within our own appraisal.

Marketing Costs

- 5.37** The Applicant has applied marketing and letting costs of 10% of the annual rental value for the commercial units. This is a standard allowance for letting fees and we have applied this to our own appraisal

Development Programme

- 5.38** The Applicant has assumed in its FVA that the development of Phase 2 is likely to take 36 months to complete construction following an initial six month pre-construction lead-in. For the purpose of this FVA review we have adopted a similar timescale of 36 months with revenue from the sale of the affordable homes being received during the construction period. This is unchanged from the S73 application FVA.

Finance Costs

- 5.39** The Applicant has adopted a finance rate of 6.75% on development costs. We note that there is no separate fee for arrangement costs or loan exit fees which typically range from 1% to 2% of the funds borrowed. This is unchanged from the S73 application FVA.
- 5.40** The funding of a project of this scale is likely to be complex with a range of different funding sources. We are aware that public sector funding has been

provided, subject to a claw-back arrangement, plus the land has been included at nil cost, thereby reducing up-front costs. For the purpose of this FVA review the Applicant's adopted rate appears reasonable.

Developer Profit

- 5.41** Under the terms of the Development Agreement the base financial model for the whole development assumes a developer's return of 15% profit on cost.

- 5.42** We have therefore adopted a target return of 15% profit on cost in determining the financial viability of this project.

6 VIABILITY OUTPUTS AND CONCLUSIONS

- 6.1** Having reviewed the Applicant's financial appraisal and FVA report, we have undertaken our own appraisal and have arrived at the main outcomes described below.
- 6.2** Based on our opinion of Gross Development Value for the proposed development and the development costs, we are of the opinion that Phase 2 of the project will generate a profit on cost in the order of 4.85%.
- 6.3** Based on this outcome we would advise that the scheme is failing to achieve its target return of 15% profit on cost and cannot afford to deliver any further affordable housing than is currently proposed.
- 6.4** It is our understanding that a further viability review will be completed at a late stage to test whether actual achieved values and incurred costs could subsequently afford a further financial top up toward affordable housing in the borough.

APPENDIX 1

Development Appraisal Summary – Reserved Matters Application

Lewisham Gateway - Phase 2
Reserved Matters Application FVA

Development Appraisal
Urban Delivery
16 January 2019

APPRAISAL SUMMARY**URBAN DELIVERY****Lewisham Gateway - Phase 2
Reserved Matters Application FVA****Summary Appraisal for Phase 1**

Currency in £

REVENUE**Rental Area Summary**

	Units	m²	Rate m²	Initial MRV/Unit	Net Rent at Sale
PRS - Studio	16	624.00	458.77	17,892	214,704
PRS - 1 Bed (2p)	185	9,503.80	361.83	18,588	2,579,085
PRS - 2 Bed (3p)	61	4,037.20	332.17	21,984	1,005,768
PRS - 2 Bed (4p)	157	11,251.60	313.29	22,452	2,643,723
PRS - 3 Bed (5p)	1	111.00	259.46	28,800	21,600
PRS - 3 Bed (6p)	4	443.00	246.50	27,300	81,900
Co-Living Studios	119	3,094.00	580.00	15,080	1,345,890
LLR - 1 Bed	53	2,734.70	210.55	10,864	414,570
LLR - 2 Bed	53	3,754.00	170.49	12,076	460,820
Co-Working Offices	1	1,635.00	344.00	562,440	562,440
A1 & A3 Retail	1	4,059.00	334.00	1,355,706	1,355,706
Cinema	1	2,322.00	205.00	476,010	476,010
Gym	1	1,481.00	205.00	303,605	303,605
Totals	653	45,050.30			11,465,821

Investment Valuation

PRS - Studio					
Current Rent	214,704	YP @	4.0000%	25.0000	5,367,600
PRS - 1 Bed (2p)					
Current Rent	2,579,085	YP @	4.0000%	25.0000	64,477,125
PRS - 2 Bed (3p)					
Current Rent	1,005,768	YP @	4.0000%	25.0000	25,144,200
PRS - 2 Bed (4p)					
Current Rent	2,643,723	YP @	4.0000%	25.0000	66,093,075
PRS - 3 Bed (5p)					
Current Rent	21,600	YP @	4.0000%	25.0000	540,000
PRS - 3 Bed (6p)					
Current Rent	81,900	YP @	4.0000%	25.0000	2,047,500
Co-Living Studios					
Current Rent	1,345,890	YP @	4.0000%	25.0000	33,647,250
LLR - 1 Bed					
Current Rent	414,570	YP @	4.0000%	25.0000	10,364,256
LLR - 2 Bed					
Current Rent	460,820	YP @	4.0000%	25.0000	11,520,504
Co-Working Offices					
Current Rent	562,440	YP @	5.2500%	19.0476	10,713,143
A1 & A3 Retail					
Current Rent	1,355,706	YP @	6.5000%	15.3846	20,857,015
Cinema					
Current Rent	476,010	YP @	6.0000%	16.6667	7,933,500
Gym					
Current Rent	303,605	YP @	6.7500%	14.8148	4,497,852
					263,203,020

GROSS DEVELOPMENT VALUE**263,203,020**

Purchaser's Costs

(15,134,174)

(15,134,174)

NET DEVELOPMENT VALUE**248,068,846****Additional Revenue**HCA/GLA Grant Monies
HIF Grant Monies9,558,850
10,000,000

19,558,850

**Lewisham Gateway - Phase 2
Reserved Matters Application FVA**

Initial MRV	Net MRV at Sale
286,272	214,704
3,438,780	2,579,085
1,341,024	1,005,768
3,524,964	2,643,723
28,800	21,600
109,200	81,900
1,794,520	1,345,890
575,792	414,570
640,028	460,820
562,440	562,440
1,355,706	1,355,706
476,010	476,010
<u>303,605</u>	<u>303,605</u>
14,437,141	11,465,821

APPRAISAL SUMMARY**URBAN DELIVERY****Lewisham Gateway - Phase 2
Reserved Matters Application FVA****NET REALISATION****267,627,696****OUTLAY****CONSTRUCTION COSTS**

Construction	m²	Rate m²	Cost	
PRS - Studio	780.00 m ²	3,730.27 pm ²	2,909,611	
PRS - 1 Bed (2p)	11,879.75 m ²	3,730.27 pm ²	44,314,675	
PRS - 2 Bed (3p)	5,046.50 m ²	3,730.27 pm ²	18,824,808	
PRS - 2 Bed (4p)	14,064.50 m ²	3,730.27 pm ²	52,464,382	
PRS - 3 Bed (5p)	138.75 m ²	3,730.27 pm ²	517,575	
PRS - 3 Bed (6p)	553.75 m ²	3,730.27 pm ²	2,065,637	
Co-Living Studios	3,867.50 m ²	3,730.27 pm ²	14,426,819	
LLR - 1 Bed	3,418.38 m ²	3,730.27 pm ²	12,751,462	
LLR - 2 Bed	4,692.50 m ²	3,730.27 pm ²	17,504,292	
Co-Working Offices	1,635.00 m ²	3,730.27 pm ²	6,098,991	
A1 & A3 Retail	4,059.00 m ²	3,730.27 pm ²	15,141,166	
Cinema	2,322.00 m ²	3,730.27 pm ²	8,661,687	
Gym	1,481.00 m ²	3,730.27 pm ²	5,524,530	
Totals	53,938.63 m²		201,205,635	201,205,635

Other Construction

Sitewide Costs (33.3%)			14,408,910	
Phase 2 - Specific Costs			2,300,000	
Carbon Liability Tax			637,300	
				17,346,210

Section 106 Costs

CIL Liabilities			182,555	
DLR Contribution			140,000	
Financial Contribution			500,000	
Lewisham Station			300,000	
Council Monitoring			30,000	
Additional Staff Resources			100,000	
				1,252,555

PROFESSIONAL FEES

Professional Fees	13.00%	26,156,733		26,156,733
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MARKETING & LETTING

Letting Agent Fee	10.00%	269,776		269,776
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Additional Costs

Cinema Capital Contribution		1,400,000		
Gym Capital Contribution		50,000		
				1,450,000

FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)				
Total Finance Cost				7,558,187

TOTAL COSTS**255,239,095****PROFIT****12,388,601****Performance Measures**

Profit on Cost%	4.85%
Profit on GDV%	4.71%
Profit on NDV%	4.99%
Development Yield% (on Rent)	4.49%
Equivalent Yield% (Nominal)	4.36%
Equivalent Yield% (True)	4.48%

**Lewisham Gateway - Phase 2
Reserved Matters Application FVA**

IRR	16.04%
Rent Cover	1 yr 1 mth
Profit Erosion (finance rate 6.750%)	8 mths