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Your Ref: New London Plan

02 March 2018

New London Plan
GLA City Hall
London Plan Team
Post Point 18
London
SE1 2AA

GVA Planning

65 Gresham Street
London
EC2V 7NQ

T: +44 (0)20 7911 2468
F: +44 (0)20 7911 2560

gva.ie

Dear Sirs,

**Draft New London Plan – Consultation (29th November 2017)
Representations on behalf of Trundley’s Road Limited**

Thank you for providing us with the opportunity to comment on the draft New London Plan. We are responding on behalf of our client, Trundley’s Road Limited (part of Aitch Group) in relation to the site at 164-196 Trundley’s Road and 1-9 Sanford Street, Deptford, SE8 5JE (the Site).

We will shortly be submitting a planning application for the Site for the demolition of existing buildings and construction of a basement, double height commercial plinth at ground floor and two buildings one of part 6 & 9 storeys and one of part 11 to 15 storeys to provide 2,200 sqm (GIA) of flexible commercial floorspace (Use Classes B1c/B2/B8) at ground and mezzanine floors, 189 residential dwellings above, with associated access and highway works, amenity areas, cycle, disabled and commercial car parking (within the basement) and refuse/recycling stores.

The Site falls within the wider Surrey Canal Strategic Industrial Location (SIL) identified and afforded strategic protection by the London Plan (2016) for industrial uses. When submitted, this application will follow 18 months of pre-application advice discussions with the London Borough of Lewisham (LBL) during which a masterplan for the Site and part of the wider Surrey Canal SIL has been collaboratively produced that would see this part of the SIL regenerated to provide commercial-led mixed use development. This approach is in line with the direction of travel set out in the evidence base for LBL’s emerging Local Plan which identifies this part of the SIL for re-designation to ‘Mixed-Employment Location (MEL) that would support a mix of commercial and residential uses to overcome the existing low density of industrial uses and poor quality of the buildings.

With particular regard to the Site, approximately 43% is occupied by non-SIL uses comprising Class ‘A’ uses with residential flats above. Further the existing buildings on the Site that are in commercial use are in a poor condition and are only partly occupied. As a result, the Site is not providing the maximum use of the SIL land and therefore has significant potential for regeneration and in particular, ‘intensification’ via the consolidation of the

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Directors of the Company: Robert McLoughlin, Gerard Hughes (British), Simon Miller (British), Stephen Brown (British), Paul Holcombe (British).

SIL uses on the Site to support the delivery of residential accommodation in accordance with draft policies E4 and E7 of the New London Plan.

It is acknowledged Policy E7 part B sets out that such development proposals:

should only be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad-hoc planning applications.

However, it is considered that this policy requirement should be implemented with some flexibility in relation to development proposals such as those for the Trundley's Road site that are coming forward during this transitional phase of planning policy, so as not to unnecessarily delay development. It is considered this should particularly be the case for development proposals such as those proposed for the Site that result in no net loss of industrial land in line with policies in the draft New London Plan and where it can be demonstrated the approach taken has been in collaboration with the borough over a significant period of time and that has resulted in proposals that are ultimately supported by the borough.

Further, in applying the general principle set out in draft policies E4 and E7 of 'no net loss of floorspace' across designated SIL sites, it is considered these policies should explicitly take into consideration the existence of non-SIL uses on some SIL sites and apply this more flexibly to allow for the protection such uses (mainly residential) are also afforded by planning policy.

It is considered that in setting an affordable housing requirement for SIL sites and a corresponding threshold approach to viability, policies H5 and H6 should take into consideration the financial implications of re-providing commercial floorspace in accordance with the detailed criteria for intensification and co-location of SIL sites set out in policy E7 and the negative impact this has on the viability of schemes. In such circumstances as these, flexibility should be provided for within policy H5 to allow for lower levels of affordable housing provision and within policy H6 to allow for no Late Stage review mechanism where it is demonstrated by the viability assessment that the affordable offer is significantly above the maximum reasonable level afforded by a scheme. In addition, policy E7 should be revised to become more flexible where compliant levels of affordable housing are proposed and authority given to boroughs to decide what is preferable in the borough (compliant commercial floorspace or compliant levels of affordable housing). Lastly, it is also considered draft policies H5 and H6 should account for the higher land values of SIL sites that are occupied by non-SIL uses such as residential use and the negative impact this has on viability.

We consider flexibility should particularly be applied for development proposals such as those for Trundley's Road that are coming forward during this transitional policy phase, that have sought to comply with draft policies E4 and E7 and that further, take a long-term view to propose a 35% GLA compliant affordable offer, despite viability evidence to demonstrate this level is significantly above the maximum reasonable amount that can be provided.

In light of the above, we request that policies H5, H6, E4 and E7 are reviewed and amended in order to be consistent with policies that support growth in the Plan.

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Yours faithfully

Sascha Wardley
Associate

For and on behalf of GVA Planning and Regeneration Limited