

# Lewisham Gypsy & Traveller Site Selection Background Paper

March 2018

## 1. Introduction

This note follows on from the Site Selection Background Paper of August 2016 (updated October 2016 and October 2017). It seeks to summarise how Lewisham Council as Local Planning Authority has sought to identify a residential traveller site to meet the need identified in the Lewisham Gypsy and Traveller Accommodation Assessment (GTAA), as updated in August 2016. In doing so, it focuses on the two potential sites that were the subject to public consultation in October/November 2016. Further detail is set out in the report to the Mayor and Cabinet Report in March 2018

## 2. The Selection Process

The process that the Council has and is undertaking to select as traveller site can be summarised as follows:

**Step 1 - Consult on proposed scope of Plan, Search Parameters, Site Selection Criteria & Sustainability Appraisal Scoping Report.** In January 2016, the Mayor and Cabinet noted the proposed methodology and approved Selection Parameters and Site Selection Criteria for consultation. Consultation on draft Parameters and Criteria took place in March and April 2016. In July 2016, the Mayor and Cabinet approved the final Parameters and Criteria (taking account of the comments received).

**Step 2 - Establish a list of appropriate Council assets.** Officers in Strategic Housing and Asset Management identified a list of all Council assets (land and buildings) of 0.24ha in size and above based on 6 pitches with an average of 400sqm from Council ownership data by reviewing the Council's asset registers.

**Step 3 - Identify a long-list of potential sites.** Officers in Strategic Housing and Asset Management applied Site Selection Criterion 1 (Effective and efficient use of public assets) and this resulted in 5 potential Council-owned sites being identified. A private landowner also put its site forward for consideration during Stage 1 and this was included on the following long-list of 6 sites:

- A - Land on Westbourne Drive SE23;
- B - Land off Turnham Road, SE4;
- C - New Cross Social Club & adjoining land, Hornshay Street, SE15;
- D - Land at R/O 46-116 Baizdon Road SE3;
- E - Land at Pool Court, SE6; and
- F - Land at St Mildred's Road, Hither Green, SE12.

Given the relatively small number of potential sites that were identified, the previously proposed 'long-list' and 'short-list' steps were combined in to one – reducing the number of steps from 7 to 6.

**Step 4 - Identify a preferred site or sites.** Planning officers applied Site Selection Criteria 2 to 10 to the long-list of sites resulting in the identification of two potential sites. In doing so, officers drew on the results of engagement with officers across the Council and the Clinical Commissioning Group and the Metropolitan Police, together with the findings of a highway and access feasibility study and flood risk studies and the Integrated Impact Assessment (combing Sustainability Appraisal and Equalities Analysis Assessment). This resulted in the following two potential sites being identified:

- C - New Cross Social Club & adjoining land (overall score "Good"); and

E - Land at Pool Court (overall score “Potentially Good”).

**Step 5 – Consult on a preferred site or sites.** In September 2016, the Mayor and Cabinet approved a Potential Sites Report for consultation. Stakeholder and public consultation on the two potential sites took place for six weeks in October and November 2016.

**Step 6- Select a site.** Officers carefully considered comments on the two potential sites and investigated issues raised. In November 2017, the Mayor and Cabinet resolved to (a) note the contents of the Consultation Statement, including the main issues raised and officer response to them and the findings of the Integrated Impact Assessment (October 2017); (b) note that officers consider that Pool Court is currently the preferred site. It also (c) instructed officers to further investigate the following matters in relation to the potential Pool Court site and report back to Mayor and Cabinet on: (i) the potential phased delivery of a traveller site, (ii) the incorporation of current public highway land in to a site and (ii) re-location assistance that could be offered to the existing scaffolding business; and (d) inform those that commented on the Potential Sites Consultation Report of these decisions.

Following consideration by the Overview and Scrutiny Business Panel in November 2017, the Mayor and Cabinet in December 2017 instructed officers to also do a cost comparison of both sites, in addition to other bricks and mortar sites before a decision is made.

Officers reported back to the Mayor and Cabinet on these issues in March 2018, when the Mayor and Cabinet were recommended (amongst other things) to (b) approve the Pool Court site as the preferred site; (d) instruct officers to continue to explore the possible acquisition of the eastern land parcel from Network Rail and any subsequent owner and (e) Note the assistance that the Council could give to the existing business to help it relocate to a suitable alternative site. In doing so, it was not recommended that the northern part of Pool Court highway be taken into the site and officers confirmed that they still consider that the overall site (combining the western and eastern land parcels) should be delivered at Pool Court delivering all of the six pitches in one phase, with vehicular access from Fordmill Road.

### **3. Site Selection Criteria**

Site Selection Criterion 1 (Effective and efficient use of public assets) was used at Step 3 to help identify the ‘long list’. The other approved criteria for all subsequent steps are as follows:

2. Reasonable access to local shops, services and community facilities in particular schools and health services.
3. Safe and reasonably convenient access to the road network.
4. Capable of satisfactory provision for parking, turning, service and emergency vehicles.
5. Mixed residential and business use opportunities
6. They have a supply of essential services such as water, sewerage and drainage and waste disposal.
7. Scope for healthy lifestyles and integration.
8. Local environmental quality.
9. Spatial planning and development management considerations.
10. Deliverability

### **4. Scoring**

Each criterion has been given a qualitative score as follows:

- 1 – Excellent
- 2- Good
- 3 – Average
- 4 – Poor

5 - Very poor

## **5. Studies and Further Investigations**

### **Highways**

The Project Centre was commissioned to assess the suitability of highway access for each of the sites on the long-list- resulting in the Highway and Access Feasibility Report: Assessment for Potential Gypsy and Traveller Sites August 2016 (updated October 2016).

### **Flooding**

GeoSmart was commissioned to advise on flooding issues and the likelihood of passing the Sequential and Exceptions Tests for the two long-listed sites that are in Flood Zone 2 or 3 (New Cross Social Club and adjoining land and Land at Pool Court. This resulted in the Flood Smart Pro and Sequential Testing report August 2016 (updated October 2016). Geosmart was also commissioned to review comments received by the Environment Agency in relation to the two potential sites (Flood Smart Technical Review, January 2017) and interpret the Agency's updated Ravensbourne River modelling (35% climate change allowance) in March/April 2017.

### **MUGA Replacement (Potential New Cross Site)**

Breeze landscape architects was commissioned to investigate the feasibility of providing replacement MUGA facilities on land at Upnall House – resulting in a draft report (May 2017) (referred to as the draft MUGA Replacement Study)

### **Masterplan and Capacity**

BDP was commissioned to prepare illustrative masterplan arrangements for the two potential sites – resulting in a Masterplan and Capacity Study (June 2017). This demonstrated a number of ways in which the Potential Pool Court and New Cross Sites could accommodate 6 pitches.

BDP was also asked to investigate whether a Pool Court site could be delivered in two phases, with at least three pitches being on site on the Council-owned land by 2021 and at least three further pitches being developed on the eastern land parcel by 2026. The resulting Masterplan and Capacity Study (February 2018) demonstrates that the eastern land parcel (Phase 2 land) could be developed to link with the western land parcel (Phase 1 land) to form a larger integrated traveller site for six pitches and ultimately that a phased approach is technically feasible. It also demonstrates that stopping up of 5.5m of the hammer-head turning area at the northern end of Pool Court (leaving a 5m length in place) could occur without impacting on the servicing/access requirements of the existing residents of Pool Court.

### **Cost Comparison**

In March 2018, officers carried out a high-level confidential comparison of the likely costs of providing six traveller pitches on the potential Pool Court site and 6 pitches on the potential New Cross site. This compared a number of site assembly and design and construction factors for the two sites. The study concludes that overall the New Cross site is likely to be the marginally more expensive of the two sites to deliver (whilst noting that these figures represent informed estimates given the information available at this stage).

Officers also carried out a comparison of developing the two identified potential traveller sites for general needs housing. This identified the New Cross site to be more suitable for higher-density general needs housing than the Pool Court site and as such, the New Cross site was identified as being a more significant strategic asset than land at Pool Court. However, it is considered that both sites have some development potential which would be lost as a result of bringing forward a traveller site.

### **Re-location assistance**

In January/February 2018, officers investigated the re-location assistance that could be offered to the existing scaffolding business that occupies the eastern land parcel at Pool Court. Officers note that this could take the form of the following: (a) a one-off goodwill financial contribution (discretionary) to assist towards relocation costs (amount to be determined); (b) LBL Economy and Partnerships officers helping in the site search, ongoing tracking of the market to assist with identifying relocation sites and inclusion on the Council's Construction Hub database for future site opportunities, and (c) providing some free planning pre-application advice from LBL Planning officers.

## **6. Stakeholder and Public Engagement**

The following Council and external stakeholders were consulted on the 'long-list' at Step 3: LBL Environmental Protection Team (comments received)

- LBL School Places Manager (no comments received)
- LBL Public Health Director (comments received)
- Lewisham Clinical Commissioning Group (comments received)
- Metropolitan Police (comments received)

All comments that were received were taken in to account when assessing the suitability of the 6 sites on the long-list – as set out in the Site Selection Background Paper of August 2016 (updated October 2016). This resulted in the New Cross (Site A) and Pool Court (Site E) being identified as potentially suitable.

Following Mayor and Cabinet approval, Stakeholder and public consultation on the two potential sites took place during Step 5 for six weeks in October and November 2016. A full explanation of who was consulted, how they were involved, a summary of the main issues raised and planning officer response to them is set out in the Regulation 18 Stage 2 Consultation Statement (October 2017).

## **7. Integrated Impact Assessment**

The Integrated Impact Assessment (IIA) has been updated to reflect changes since August 2016 and the results of consultation, including comments on the IIA itself. The latest IIA (March 2018) assesses the two potential sites against 16 identified objectives. In summary, the IIA finds that the provision of gypsy and traveller pitches at New Cross Social Club site could have a detrimental effect on health, social inclusion and accessibility to community infrastructure through the loss of a social club and games area space. It also finds that the provision of gypsy and traveller pitches at Pool Court could have a negative effect on landscape, biodiversity, flora and fauna through the loss of open space.

## **8. Site C - New Cross Social Club & adjoining land**

### **Site & Surroundings**

A part one and part two-storey licensed social club and hall – which also includes a residential flat. The hall is used for community events, including church services on Sundays. To the west of the building is a car park for approximately 25 cars. To the east of the building sits a flood-lit Multi Games Area (MUGA) comprising three separate games areas – this effectively forms part of the Winslade Estate.

To the north lies the main part of the Winslade Estate; mainly four-storey blocks of flats and parking courts and open space courtyards that stretches northwards to Rollins Street.

A pedestrian underpass built as part of these works provides a link between Hornshay Street and John Willis Close to the east.

The East London Line Extension (ELLE) between Surrey Quays and Clapham Junction opened in December 2012 and adjoins the site to the south and now forms part of the London Overground.

The South London railway line crosses Hornshay Street on a bridge immediately to the west and this comprises the borough boundary with the LB Southwark. There is an existing telecommunications mast located in the railway embankment immediately to the west of the site. To the west of this bridge (fronting Ilderton Road) are a number of open yard motor-trade and builder related businesses.

Car parking in Hornshay Street is generally uncontrolled, although there is a short length of yellow-line control on the south side of the street, under the railway bridge. On-street car parking takes place on both sides of the street.

**Size:** 3,100sqm

**Ownership:** LBL Freehold. The New Cross Social Working Men's Club initially had a 60-year lease of the whole site (up to January 2034). The land now occupied by the MUGA was surrendered to the Council in 2006, to allow for the MUGA to be built. In 2010, the Council granted a one year to the Wheelshunters Club to stay in the Social Club building. However, the initial 60-year lease was not terminated and remains in place.

**Context:** The existing MUGA was funded by the former New Cross Gate NDC and Marathon Trust about 10 years ago.

The site is very close to the boundary with the LB Southwark. There are four gypsy and traveller sites within 1500m in Southwark, providing a total of 42 pitches, as follows:

- Brideale Close SE15 (Off Glengall Road) 16 pitches;
- Burnhill Close SE15 (Off Leo Street, Behind Toys 'R' Us in Old Kent Road) - 5 pitches;
- Ilderton Road SE16 (Next to South Bermondsey Railway Station) - 15 pitches;
- Springtide Close SE15 – 5 pitches.

Passive provision has been made for a new train station at Surrey Canal Road on the London Overground network; linked with the approved Surrey Canal Triangle development/ New Bermondsey Housing Zone.

The area to the west of Ilderton Road is within the London Plan Old Kent Road Opportunity Area and LB Southwark and the GLA are preparing and Opportunity Area Planning

Framework (OAPF) and Area Action Plan (AAP). Related to this, in December 2015, TfL confirmed that the proposed Bakerloo Line Extension would follow the Old Kent Road route to Lewisham (initially). In February 2017, TfL consulted on four locations for stations along the Old Kent Road, including one by the 'Toys R Us' store (approx. 500m from the potential site). The BLE is at a relatively early stage and is by no means certain. It is also not certain whether there would be a station in the indicative location shown. In any event, an approved BLE/new station is unlikely to be delivered before 2030 at the earliest.

## **Overall Summary & Conclusion**

The Masterplan and Capacity Study (June 2017) demonstrates that the potential site could accommodate at least 6 pitches. A potentially good site.

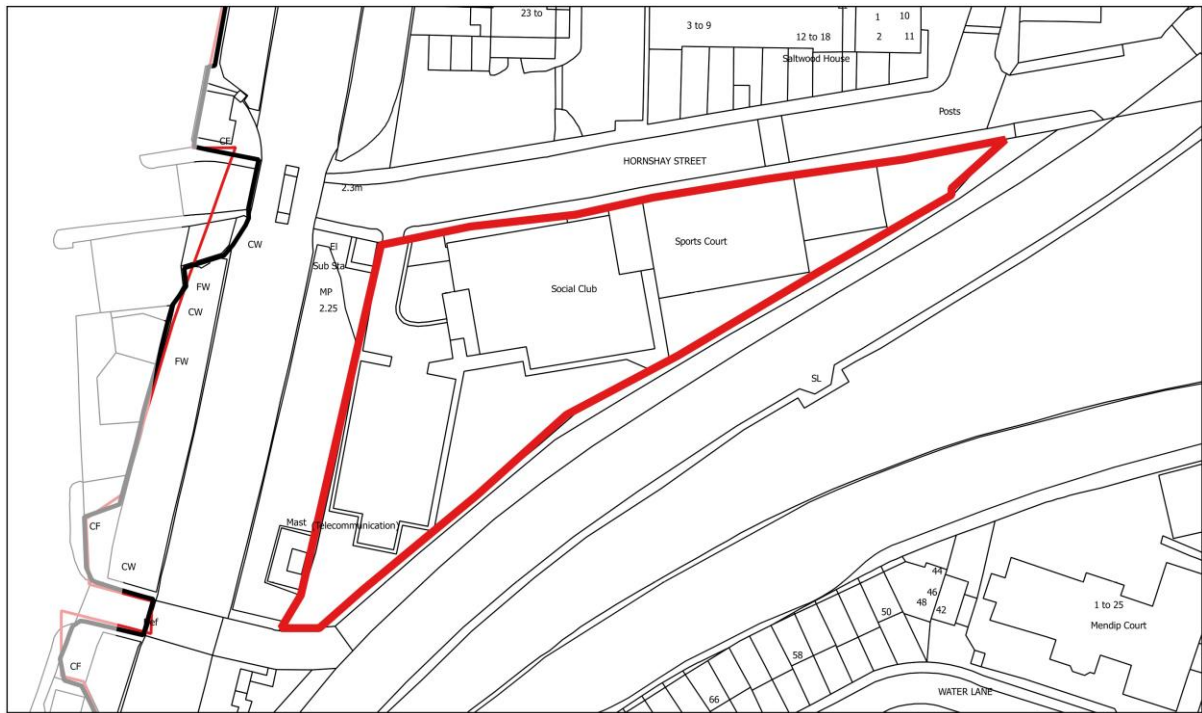
Floor Risk Zone 3a - High pluvial flood risk identified, but based on the presence of existing defences, the actual risk to property is considered low. Reasonable prospect of passing 'sequential' and 'exceptions' tests.

The loss of the Social Club and housing without mitigation would be against policy. However, this needs to be balanced against Core Strategy Policy 2 which makes clear that the Council will assess and provide for the identified needs of the gypsy and traveller community. Officers consider that facilitating the provision of a traveller site (which would result in a net gain of residential accommodation) could represent special circumstances that justify the loss of the Social Club and existing residential accommodation.

The draft MUGA Re-provision Study finds that (subject to consultation) the Upnall House hardstanding area could accommodate one multi-use games area and a team area of approx.407sqm or a multi-use games area and separate informal basketball practice area of approx.323sqm. Whilst these options would mean that there would be a significant net loss of games space, it would enable replacement smaller facilities to be provided in the immediate area. Officers consider that facilitating the provision of a traveller site could represent special circumstances that justify such a loss.

The Masterplan Capacity Study (June 2017) suggests that it would be possible to provide 6 traveller pitches on the potential New Cross site whilst retaining the existing small kick-about area and informal basketball practice area. If this approach was taken and a replacement games area was also provided on the Upnall House land, then there would be no loss of facilities and a small net gain in space (approx. 760sqm as opposed to the existing 720sqm). The Masterplan Capacity Study also identifies an option of providing 6 traveller pitches and a replacement multi-use games area on the site of the existing Social Club car park that could possibly retain all facilities and avoid any net loss in space.

## Site Plan & Photos



## Application of Criteria

New Cross Social Club -Selection criteria	Commentary	Score
2. Reasonable access to local shops, services and community facilities	(a) Bus stop/station - <b>100m (potential new Overground Station within approx. 500m and in longer term potential BLE Station within approx. 500m)</b> (b) The following services within 1,500m	<b>2. Good</b>

New Cross Social Club -Selection criteria	Commentary	Score
in particular schools and health services.	<ul style="list-style-type: none"> <li>• Local shop - <b>Approx. 400m</b></li> <li>• Primary School – <b>Pilgrim’s Way in LB Southwark – approx. 300m</b></li> <li>• Health facility – <b>The Queen’s Road Partnership, approx. 800m</b></li> </ul>	
3. Safe and reasonably convenient access to the road network.	<p>(a) Safe vehicular access or capable of creating safe vehicular access for 15m long caravan to/off a public highway.</p> <p>(b) Access for emergency services.</p> <p>(c) Clearance height of 3.7m.</p> <p><b>Yes – but approaching the site from the west (Ilderton Road) would require a very wide site entrance and could cause conflicts with parked cars on both sides of Hornshay Street. Need parking restrictions on Hornshay Street with likely loss of 6 on-site parking opportunities.</b></p>	<b>2. Good</b>
4. Capable of satisfactory provision for parking, turning, service and emergency vehicles	<p>(a) Judgement (size and shape of site).</p> <p>(b) Infrequent access needed for 15m long caravan.</p> <p><b>Yes – possible, subject to site planning &amp; design.</b></p>	<b>2. Good</b>
5. Mixed residential and business use opportunities.	<p>(a) Mixed-use residential and business use acceptable in principle <b>Yes.</b></p> <p>(b) Any likely adverse impacts are acceptable (assuming environmental permitting regulations, licensing and planning conditions manage activities that could be carried out). <b>Yes.</b></p>	<b>1. Good</b>
6. Supply of essential services such as water, sewerage and drainage and waste disposal.	Assume all sites have access to all essential services or are capable of being connected (NB cost of doing so may vary and affect deliverability). N.B. All sites to be given a score of ‘Average’ for this criterion.	<b>3. Average</b>
7. Scope for healthy lifestyles and integration.	<p>(a) Opportunities for healthy lifestyles such as adequate landscaping &amp; play areas – Judgement (size and shape of site).</p> <p><b>Yes – possible, subject to site planning &amp; design. Bridge House Meadows open space within 800m.</b></p>	<b>2. Good</b>
	<p>(b) High standard design and landscape which facilitates the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site – Judgement (size and shape of site).</p> <p><b>Yes – possible, subject to site planning &amp; design. No immediate residential neighbours to east, south or west. Housing to the north - on opposite side of Hornshay Street.</b></p>	<b>2. Average</b>
8. Local environmental quality.	(a) Contamination – Free from significant contamination or able to be cleaned up (consult LBL Environmental Health) ((NB cost of doing so may vary and affect deliverability).	<b>2. Good</b>



New Cross Social Club -Selection criteria	Commentary	Score
	<p><b>No specific data available – proximity to railway means that there could be issues.</b></p> <p>(b) Noise – Acceptable internal noise environment (consult LBL Environmental Health) <b>Railway noise would be an issue that would need to be addressed.</b></p> <p>(c) Air quality – Acceptable air quality (consult LBL Environmental Health) <b>Within AQMA3 – but away from main road, so OK.</b></p> <p>(d) Flooding – Reasonable prospect of sequential test and exceptions tests being met <b>Yes - Floor Risk Zone 3a - High pluvial flood risk identified, but based on the presence of existing defences, the actual risk to property is considered low.</b></p>	
9. Spatial planning & development management considerations.	<p>(a) Key relevant site-specific development plan policies – both for the site itself and adjoining land <b>Within:</b></p> <ul style="list-style-type: none"> <li>• <b>Flood Zone 3A</b></li> <li>• <b>AQMA1</b></li> <li>• <b>New Cross/New Cross Gate Regeneration &amp; Growth Area (Spatial Policy 1)</b></li> <li>• <b>Lewisham, Catford &amp; New Cross Opportunity Area (London Plan Policy 2.13)</b></li> <li>• <b>Area of Regeneration (London Plan Policy 2.14)</b></li> <li>• <b>Area of Archaeological Priority (Policy CS16)</b></li> </ul> <p><b>Adjacent to:</b></p> <ul style="list-style-type: none"> <li>• <b>London Plan Old Kent Road Opportunity Area (west side of Ilderton Road)</b></li> <li>• <b>Green Chain/Corridor (Policy CS12)</b></li> <li>• <b>SINC 13 (Policy CS12)</b></li> </ul> <p>(b) Key relevant general policies</p> <ul style="list-style-type: none"> <li>• <b>CS Policy 2 (Gypsy and Travellers)</b></li> <li>• <b>CS Policy 10 (Managing &amp; reducing the risk of flooding)</b></li> <li>• <b>CS Policy 14 (Sustainable movement &amp; transport)</b></li> <li>• <b>LP Policy 5.12 (Flooding risk management)</b></li> <li>• <b>CS Policy 19 – Loss of recreational facility</b></li> <li>• <b>LP Policy 3.19 (Sports facilities) seeks to resist the loss of sports facilities.</b></li> <li>• <b>CS Policy 19 – Loss of community premises.</b></li> <li>• <b>LP Policy 3.16 - Protection and enhancement of social infrastructure.</b></li> </ul> <p>(c) Key relevant policies in emerging Local Plan and any emerging Neighbourhood Plan</p> <ul style="list-style-type: none"> <li>• <b>No Neighbourhood Plan under preparation.</b></li> </ul> <p>(d) Key relevant planning guidance</p> <ul style="list-style-type: none"> <li>• <b>None relevant (Old Kent Road Opportunity Area Planning Framework &amp; Area Action Plan under preparation).</b></li> </ul>	<b>3. Average</b>

New Cross Social Club -Selection criteria	Commentary	Score
	<p>(e) Planning history – identification of any key relevant planning history.</p> <ul style="list-style-type: none"> <li>• <b>Permission granted 20/12/2005 (DC/05/60748/X) for the provision of a multi-use games area next to New Cross Social Club, together with the formation of a replacement car park for 25 cars.</b></li> <li>• <b>Observations of proposed telecommunications mask on railway embankment to west of site 15-05-09 (DC/09/71216).</b></li> </ul>	
	<p>(f) Summary – overall conclusion, taking account of the above.</p> <ul style="list-style-type: none"> <li>• <b>A Social Club is a ‘sui generis’ use for planning purposes</b></li> <li>• <b>Policy presumption against the loss of a community facility and sports facility without mitigation. Feasibility works suggests that, subject to consultation, there are realistic options for mitigating the loss of sports facilities on nearby land.</b></li> <li>• <b>Flood risk - OK</b></li> <li>• <b>The PTAL of the area is currently 2. This would be improved by the opening of a Surrey Canal Road Station on the Overground and (in the longer term) an Old Kent Road Station on an extended Bakerloo Line.</b></li> </ul>	
10. Deliverability	<p>Taking account of all of the previous criteria, sites should be:</p> <p>(a) Available now;  (b) Offer a suitable location for development; and  (c) Be achievable with a realistic prospect that development will be delivered on the site within five years.</p> <p><b>Leasehold issues in relation to the Social Club building need to be resolved – but the site is considered deliverable. Subject to consultation, there are realistic options for mitigating the loss of sports facilities on nearby land.</b></p>	<b>4. Good</b>

## **9. Site E – Land by Pool Court**

**Site & Surroundings:** Open land at the rear of Pool Court residential development, with vehicular access from Pool Court. Adjoining scaffolding yard with direct access from Fordmill Road. The Catford Loop railway line crosses over Fordmill Road to the east of the site. The Pool River runs to the north of the site and is in a concrete channel at this point.

**Size:** Following clarification on ownership and minor adjustments, the overall potential site measures approx. 3,150sqm, but with scope for minor increase in size if all or part of the existing hammer-head turning are at the northern end of Pool Court (see below).

**Ownership:** The Council owns the western part of the potential site, but not a sliver of land between the site and the Ravensbourne River. Network Rail owns this sliver of land and also the eastern part of the potential site, which is partly occupied by a scaffolding yard which has a lease expiring in 2020. Network Rail is currently undertaking a portfolio sale of its commercial estate and is not able to consider offers for the sale of the eastern part of the potential site. On this basis, the Council would need to discuss purchase with the new owner of the land. Officers understand that Network Rail is hoping to dispose of its commercial estate in June 2018.

**Overall Summary & Conclusion:** The Council owned land by itself would be too small to deliver the required minimum 6 traveller pitches. The Masterplan and Capacity Studies (June 2017 and February 2018) demonstrates that the potential (combined) site could accommodate at least 6 pitches and that this could potentially provide a good site.

The north-western part of site has flooded in the past (including in 1965) and the Environment Agency raised some significant concerns in response to the Potential Sites Consultation Report. The Agency has recently released up-to-date flood modelling for the Ravensbourne River for a 1:100-year flood event including 25 and 35% allowances for climate change. It should be noted that this does not take account of the proposed Beckenham Place Park Flood Alleviation Scheme. This shows flood water running back from the River along the adjoining railway corridor and extending on to the western part of the potential site. Following discussion with the Agency, officers consider that there is the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case is made and that adequate mitigation is incorporated.

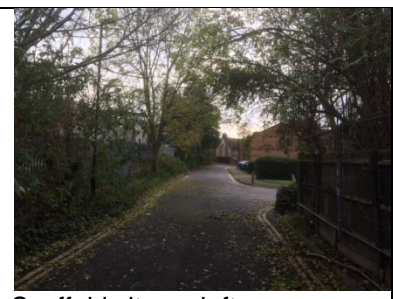
Following the studies and further investigations outlined in Section 5, it was concluded that whilst the inclusion of the northern part of the Pool Court highway area in to the site could help reduce fly-tipping, it is not essential to deliver a site and it has not been included. However, minor revisions to the northern and western boundaries are proposed to exclude the river wall and sliver of land next to it and to better reflect land ownership.

The Masterplan Capacity Study (February 2018) demonstrates that the eastern land parcel (Phase 2 land) could be developed to link with the western land parcel (Phase 1 land) to form a larger integrated traveller site for six pitches and that a phased approach is technically feasible. However, it was concluded that a combined site should be delivered at Pool Court delivering all of the six pitches in one phase, with vehicular access from Fordmill Road.

## Site Plan & Photos



Fordmill road frontage



Scaffold site on left



## Application of Criteria

Land by Pool Court	Commentary	Score
2. Reasonable access to local shops, services and community facilities in particular schools and health services.	<p>(a) Bus stop/station – <b>Canadian Avenue - Approx. 500m</b></p> <p>(b) The following services within 1,500m</p> <ul style="list-style-type: none"> <li>• Local shop – <b>south side of Catford Town Centre - Approx. 800m</b></li> <li>• Primary School – <b>Athelney Primary – Approx. 550m</b></li> <li>• Health facility – <b>Woolstone Medical Centre - approx. 800m</b></li> </ul>	<b>2. Good</b>
3. Safe and reasonably convenient access to the road network.	<p>(a) Safe vehicular access or capable of creating safe vehicular access for 15m long caravan to/off a public highway.</p> <p>(b) Access for emergency services.</p> <p>(c) Clearance height of 3.7m.</p> <p><b>Different scenarios:</b></p> <p><b>1. Using the existing entrance to the Scaffolding site for all vehicle access; 2. Closing the existing access to the scaffolding site and creating a new access on the Pool Court turning head for all vehicle access; and 3. Creating a new access on the Pool Court turning head and allowing vehicles to manoeuvre through the site between the two accesses. Some works likely to be needed for each of these scenarios – including widening of existing access from Fordmill Road or widening of the Pool Court junction (likely loss of tree).</b></p>	<b>1. Good</b>
4. Capable of satisfactory provision for parking, turning, service and emergency vehicles	<p>(a) Judgement (size and shape of site).</p> <p>(b) Infrequent access needed for 15m long caravan.</p> <p><b>All scenarios look possible.</b></p>	<b>1. Good</b>
5. Mixed residential and business use opportunities.	<p>(a) Mixed-use residential and business use acceptable in principle <b>Yes (if access restricted to Fordmill Road) (Scenario 1).</b></p> <p>(b) Any likely adverse impacts are acceptable (assuming environmental permitting regulations, licensing and planning conditions manage activities that could be carried out). <b>Yes (if access restricted to Fordmill Road) (Scenario 1).</b></p>	<b>1. Excellent</b>

Land by Pool Court	Commentary	Score
6. Supply of essential services such as water, sewerage and drainage and waste disposal.	Assume all sites have access to all essential services or are capable of being connected (NB cost of doing so may vary and affect deliverability). N.B. All sites to be given a score of 'Average' for this criterion.	<b>3. Average</b>
7. Scope for healthy lifestyles and integration.	<p>(a) Opportunities for healthy lifestyles such as adequate landscaping &amp; play areas – Judgement (size, shape and topography of site). <b>Yes, subject to detailed design.</b></p> <p>(b) High standard design and landscape which facilitates the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site – Judgement (size and shape of site). <b>Yes, subject to detailed design.</b></p>	<b>2. Good</b>
8. Local environmental quality.	<p>(a) Contamination – Free from significant contamination or able to be cleaned up (consult LBL Environmental Health) ((NB cost of doing so may vary and affect deliverability). <b>No specific data available – proximity to railway and existing use of part of the site as a scaffolding yard means that there could be issues.</b></p> <p>(b) Noise – Acceptable internal noise environment (consult LBL Environmental Health). <b>Railway noise would be an issue that would need to be addressed.</b></p> <p>(c) Air quality – Acceptable air quality (consult LBL Environmental Health) <b>Not in AQMA. OK.</b></p> <p>(d) Flooding – Reasonable prospect of sequential test and exceptions tests being met. <b>Following mitigation - Moderate risk of surface pluvial flooding and low risk level river and groundwater. Reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case was made and that adequate mitigation was incorporated.</b></p>	<b>3. Average</b>
9. Spatial planning & development management considerations.	<p>(a) Key relevant site-specific development plan policies – both for the site itself and adjoining land</p> <p><b>Within:</b></p> <ul style="list-style-type: none"> <li>• Part in Flood Zone 2/Part in Flood Zone 3A</li> <li>• Pool River Linear Park SINC (Policy CS 12 &amp; SALP)</li> <li>• Area of Archaeological Priority (Policy CS16)</li> </ul> <p><b>Adjacent to:</b></p> <ul style="list-style-type: none"> <li>• Pool River Linear Park SINC (Policy CS 12 &amp; SALP)</li> </ul>	<b>3. Average</b>

Land by Pool Court	Commentary	Score
	<p>(b) Key relevant general policies</p> <ul style="list-style-type: none"> <li>• <b>CS Policy 2 (Gypsy and Travellers)</b></li> <li>• <b>CS Policy 10 (Managing &amp; reducing the risk of flooding)</b></li> <li>• <b>CS Policy 14 (Sustainable movement &amp; transport)</b></li> <li>• <b>LP Policy 5.12 (Flooding risk management)</b></li> <li>• <b>Core Strategy Policy 5 (Other employment locations) states, amongst other things, that</b> <ul style="list-style-type: none"> <li>○ <b>The Council will protect the scattering of employment locations throughout the borough outside SIL, LEL &amp; MUEs.</b></li> <li>○ <b>Other uses including retail, community and residential will be supported if it can be demonstrated that site specific conditions including site accessibility, restrictions from adjacent land uses, building age, business viability, and viability of redevelopment show that the site should no longer be retained in employment use</b></li> </ul> </li> <li>• <b>DM Policy 11 (Other employment locations) sets out specific criteria for considering applications for redevelopment for change to other business uses suitable for a residential area.</b></li> </ul> <p>(c) Key relevant policies in emerging Local Plan and any emerging Neighbourhood Plan</p> <ul style="list-style-type: none"> <li>• <b>No Neighbourhood Plan under preparation.</b></li> </ul> <p>(d) Key relevant planning guidance</p> <ul style="list-style-type: none"> <li>• <b>River Corridor Improvement Plan SPD (September 2015)</b></li> </ul> <p>(e) Planning history – identification of any key relevant planning history.</p> <ul style="list-style-type: none"> <li>• <b>Planning application (DC/07/66731) submitted for the continued use of land adjacent to 16 Fordmill Road as a scaffolding/builder’s yard.</b></li> </ul> <p>(f) Summary – overall conclusion, taking account of the above.</p> <ul style="list-style-type: none"> <li>• <b>Benefits of a good quality site could outweigh the loss of employment land and the development of land of ecological significance.</b></li> </ul>	
10. Deliverability	<p>Taking account of all of the previous criteria, sites should be:</p> <p>(c) Available now;</p> <p>(d) Offer a suitable location for development; and</p> <p>(e) Be achievable with a realistic prospect that development will be delivered on the site within five years.</p> <p><b>At least 6 pitches are deliverable, but only in conjunction with other land that would need to be acquired. A phased approach to delivering a site is possible – but is not the preferred approach.</b></p>	<b>4. Average (Potentially good)</b>

## Summary Matrix

	2. Local Facilities	3. Access to highway	4. Parking etc.	5. Business use	6. Essential services	7. Health & Integration	8. Environmental Quality	9. Planning	10. Deliverability	Comment/ Overall	Commentary
<b>C. New Cross Social Club*</b>	Good	Good	Good	Good	Average	Good	Average	Average	Good*	<b>Good*</b>	A potentially good site. Flood Risk Zone 3a - High fluvial flood risk identified, but based on the presence of existing defences, the actual risk to property is considered low. Reasonable prospect of passing 'sequential' and 'exceptions' tests. Facilitating the provision of a traveller site (which would result in a net gain of residential accommodation) could represent special circumstances that justify the loss of the Social Club and existing residential accommodation. Feasibility work suggests that (subject to consultation with local people and scheme development), two of the existing play courts could be retained and/or that replacement MUGA facilities could be provided on land at Upnall House.
<b>E. Pool Court**</b>	Good	Good	Good	Excellent+	Average	Good	Average	Average	Average (Potentially Good)	<b>Potentially Good**</b>	The Council owned land by itself would be too small to provide the 6 traveller pitches required by 2031. However, if it were combined with the adjoining scaffolding yard, the combined site could be potentially good in terms of deliverability. Officers consider that there is the reasonable prospect of meeting the 'sequential' and 'exceptions' tests in terms of flooding, providing that adequate mitigation is incorporated. A carefully designed scheme that eradicates Japanese knotweed, responds positively to the river, retains/mitigates the loss of existing valuable trees and any protected species could satisfactorily address ecological consideration and be acceptable.

\* Subject to resolution of lease and covenant issues. \*\* Needs to be developed in conjunction with other land

+ Assuming that the site is accessed solely from Fordmill Road



