

Creek Road/Bardsley Lane, Greenwich

in the London Borough of Greenwich

planning application no. 05/1222/F

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

The proposal

Redevelopment to provide 106 residential flats, A1, A2, A3 and A4 retail, a club use in the basement area, nursery/creche use or training centre (D1), B1 office space and basement parking.

The applicant

The applicant is **Hyde Housing Association**, and the architect is **KSS Design Group**.

Strategic issues

The redevelopment offers a **mixed-use** development within the **town centre**, including commercial, community and residential uses. Part of the site falls within a **Strategic Viewing Corridor** and the buffer zone of the **Maritime Greenwich World Heritage** site and along Creek Road part of the **strategic road network** identified for a future **tram** system. The proposal also raises strategic policy issues relating to the provision of **wheelchair housing**, the loss of a **residential hostel** and the information submitted does not confirm that **inclusive design** principles have been fully taken into account and that the proposal will not impact upon the **strategic view**. It appears that many of the points raised by Transport for London have been addressed, but confirmation of this is required.

Recommendation

That Greenwich Council be advised that the principle of the redevelopment is generally acceptable in strategic policy terms. There are however, numerous issues that should be fully addressed by the applicant before the proposal is referred back to the Mayor for a decision.

Context

1 On 20 May 2005 Greenwich Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 At the time the application was referred to the Mayor, the application was referable under Category 1B of the Schedule of the Order 2000, which relates to the height of the proposed

buildings. Since then, the application has been amended, and the proposed height (maximum 23 metres) and floorspace (14,066 sq.m.) do not trigger the criteria of Categories 1B and 1C. However, Article 3 requires the local planning authority to refer an application of potential strategic importance as soon as is reasonably practicable after receipt. That was the case with this application since it exceeded the threshold for referral and was therefore referred, and only subsequently amended. This is outlined in Article 4(1) of the order that states "*The local planning authority shall not grant permission on an application which they were required to notify to the Mayor under article 3...*". Although the Mayor is not being asked for a determination at this stage, it is still appropriate for a consultation response to be provided.

3 Accordingly, if Greenwich Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London's comments on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The long, narrow site is located within Greenwich Town Centre to the south of Cutty Sark Station. The site has a long frontage along Creek Road and backs on to Bardsley Lane. To the rear is the St. Alfege Recreation Ground (former grave yard).

7 The site currently contains a variety of buildings including a residential hostel, a locally listed comedy club, two public houses, an unauthorised car washing business, light industrial units including portacabins, and two small grassed open spaces. The site is within Greenwich town centre as identified by the Greenwich Unitary Development Plan and the area is characterised by a mixture of shops, offices and residential properties. A third of the site is located within the buffer zone of the Maritime Greenwich World Heritage site.

8 The site is within the Strategic Viewing Corridor from Greenwich Park towards St. Paul's Cathedral, but is not in the emerging London Panorama of the Greenwich Park to St. Paul's Cathedral of the London View Management Framework draft Supplementary Planning Guidance. Within the Greenwich Unitary Development Plan the site has been identified as 'mixed-use' development site where retail, A3, community uses, civic open space, residential and offices would be appropriate. It outlines that the development be linked to improvements to openness and landscaping of St. Alfege's Recreation Ground.

9 The site is located along Creek Road that forms part of the Strategic Road Network whilst the nearest Transport for London Road Network is the A2 which is approximately one kilometre away from the site. The Cutty Sark DLR station is within walking distance from the site and the Greenwich DLR and mainline rail stations are within 500 metres. The development site benefits from frequent rail services to Central London and Kent area, but also from a large number of bus services. Transport improvements in the future include the DLR 3-car upgrade and in the longer term Phase 3 (between North Greenwich and Greenwich National Rail Station) of the Greenwich Waterfront Transit services that should further boost the public transport accessibility level of the site, which is currently 5.

Details of the proposal

10 The current application proposes five buildings, blocks A – E. The blocks range in height from two to six storeys high and will contain commercial units at the ground floor levels with residential units above. In total the non-residential floorspace comprises 3,259 sq.m. and there are 106 residential flats. The proposed land uses are as follows:

	residential uses		non-residential uses
	quantity	type	
block A	2 10 4	1-bed flats 2-bed flats 3-bed flats	restaurant/cafe (A3) 380 sq.m. basement club 644 sq.m.
block B	38 8	2-bed flats 3-bed flats	retail (A1/A2) 1,100 sq.m. drinking establishment (A4) 100 sq.m.
block C	12 3	2-bed flats 3-bed flats	restaurant/cafe (A3) 410 sq.m.
block D	5 18 3	1-bed flats 2-bed flats 3-bed flats	nursery/creche, community use (D1) 420 sq.m.
block E	3	2-bed flats	restaurant/cafe (A3) 68 sq.m. office (B1) 137 sq.m.

11 The maximum height of the proposed buildings is 25 metres.

Case history

12 As mentioned, since the application was originally referred to the Mayor, the proposal has been amended several times firstly to remove a tower element and secondly to alter the mix of units to increase the amount of family sized units.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; PPG3, draft PPS3, Housing SPG*
- Affordable housing *London Plan; PPG3; draft PPS3, Housing SPG*
- Density *London Plan; PPG3; draft PPS3, Housing SPG*
- Urban design *London Plan; PPS1*
- Mix of uses *London Plan*
- Regeneration *London Plan; London's Economic Development Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13, draft Land for Transport Functions SPG*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Loss of open land *London Plan; PPG17*
- Access *London Plan; PPS1; SPG "Accessible London: achieving an inclusive environment"; ODPM Planning and Access GPG*

- Tall buildings/views *London Plan; RPG3A, draft View Management Framework SPG*
- Ambient noise *London Plan; the Ambient Noise Strategy; PPG24*
- Air quality *London Plan; the Air Quality Strategy; PPS23*
- Sustainable development *London Plan; PPS1, PPG3; PPG13; PPS22; the Mayor's Energy Strategy, Sustainable Design and Construction SPG*
- River Thames/flooding *London Plan; PPG25; draft PPS25, RPG3B*

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the recently adopted Greenwich Unitary Development Plan (2006) and the 2004 London Plan.

Housing

15 Policy 3A.7 of the London Plan sets the Mayor's strategic target for affordable housing at 50% of housing provision. Within that, the London-wide objective of 70% social housing and 30% intermediate provision, and the promotion of mixed and balanced communities, is set. Policy 4B.1 and 4B.3 outline the need for development proposals to achieve the highest possible intensity of use compatible with the local context, the design principles of the compact city and with public transport capacity.

16 The proposal delivers 51% affordable housing on a unit basis and 50% affordable housing on a habitable room basis, thus meeting the London Plan policy expectation. Additionally, the proposal also offers the appropriate 70:30 tenure split. Both the social rented and the intermediate housing is pepper-potted throughout the development.

17 Unfortunately, the development does not include the provision of any 4-bed units, and only six of the eighteen 3-bedroom units are affordable. The applicant has explained that given the town centre location commercial units have been provided at ground floor level, which excludes the provision of residential properties with access to ground floor gardens and the fact the site is very long and narrow so there is not the possibility of providing podium level gardens. Accordingly, the applicant believes that this town centre location is not suitable for family accommodation. Town centre locations can be suitable for family housing, but the constraints of the site are accepted as justification in this instance.

18 There is a residential hostel on the site that will be lost as part of the redevelopment. This hostel is currently occupied. No information has been supplied to GLA officers about the loss of this facility or how the building is currently utilised. London Plan policy 3A.13 states that the loss of hostels should be resisted unless the existing floorspace can be satisfactorily re-provided to an equivalent or greater standard. The applicant should clarify the existing use of the hostel and confirm that replacement provision that is being made.

19 The density of the proposed development is 378 habitable rooms per hectare, which is considerably lower than density range outlined in London Plan table 4B.1 which seeks 650–1100 habitable rooms per hectare in locations such as this. Although lower than would normally be expected for a town centre location with high public transport accessibility, the location of the site within the conservation area, within the buffer zone of the World Heritage Site and its location within the Strategic Viewing Corridor go some way to explaining this low-density development. The earlier proposal that included a large tower was amended, as it was unlikely to receive support from Greenwich Council.

Mix of uses

20 With the exception of the unresolved loss of the residential hostel as discussed above, the proposed mix of uses including a nursery/community use, commercial uses within the town centre location and residential accommodation are welcomed.

21 The Mayor has received a letter from a local resident about the loss of the Lord Hood pub. This matter has also raised significant interest from local residents during Greenwich Council's public consultation process. The pub is an attractive building within the conservation area and it does appear to have popularity with local people. This is a controversial issue locally, which Greenwich Council needs to address; the loss of the pub does not raise any strategic policy concerns.

22 Greenwich Council has reported that the existing number of jobs on the site is approximately 15 and that the proposed number of jobs will be approximately 100. This information does not appear to be located within the environmental statement so it is not clear how the predicted figure was calculated, as it does seem quite high for the proposed 3,259 sq.m. of non-residential floorspace. However, the loss of the existing small amount of employment space and its replacement with alternative commercial uses does not raise any strategic policy concerns, while the removal of unauthorised car wash will improve amenity in the area.

Loss of open land

23 London Plan policy 3D.7- *Realising the value of open space*, seeks the protection and promotion of London's network of open spaces. The proposal does involve developing over two small pockets of open land. This space is currently grassed and contains several large trees. As mentioned, within the Greenwich UDP the site is expected to link to improvements to the openness and landscaping of the adjoining park and some civic amenity space. These matters do not appear to have been adequately addressed by the application. Although the existing open space is small it does appear to provide important links through to the adjoining residential developments and it does serve to break up the built up environment of the town centre.

24 It is recognised that, besides the pedestrian function of the open spaces and its contribution to the openness of the area, the open space is probably not used as a recreation space, given its limited size and location next to a busy road and a car wash. However, this loss should still be acknowledged and further efforts should be made to improve the pedestrian links through the site. This matter will be discussed below, in the paragraphs relating to urban design.

Urban design

25 The long, narrow shape of the site does largely constrain the form of the development. Additionally, the location within the conservation area, buffer area of the World Heritage site and the strategic view has also served to constrain the development potential of the site. Although the overall building form is not inappropriate, the applicant has been asked to look at the treatment given to the ground floor elevations particularly along Bardsley Lane where the elevations have a distinct 'back of house' feel to them. The lack of activity along the ground floor is unacceptable on the basis that Bardsley Lane will serve as the access point for many of the residential flats and will also be used by pedestrians entering the residential sites to the rear of the subject site (i.e. Bardsley House, Sexton's House, etc.). In response to these points the applicant has submitted indicative drawings showing how the elevations can be improved. While these amendments start to address these concerns, further work should be done.

26 As two small areas of open space are being lost, more should be made of the existing park adjacent to the development site and the openness of the actual development should be improved. Firstly, one of the key pedestrian routes through the site should be at the eastern end of site and then secondly adjacent to the existing comedy club. At the eastern end of the site the existing

small lane towards the park will be retained, as will an historic wall. That part of the proposed development that faces on to this lane accommodates the emergency stairs and the bin stores. This is not an inviting frontage to walk past on the way down the lane. Additionally, the proposed drawings use the phrase 'possible entrance through to recreation ground' which does not adequately demonstrate how access to the park will be opened up.

27 A similar problem exists next to the other through route (next to the retained comedy club). Although it is welcomed that the semi-pedestrianised square is provided and cafe and retail uses will front on this space, to enter the square pedestrians will have to walk past the blank elevation of the existing building (this can not be changed), but also past several fire exits (another seemingly blank elevation) to block B. This should be reconsidered and altered on the plans.

28 Block E does not provide an attractive frontage on to the recreation ground, as it has a blank facade at ground floor level. Currently the park suffers from all of the existing development turning its back on it and the park appears to suffer anti-social behaviour issues perhaps worsened by its relatively secluded nature. Breaking up or opening up the ground floor facade will help overcome this problem.

29 London Plan Policy 3A.15 provides a policy context for social infrastructure, including children's play space. Accordingly, the provision of the community space/nursery is welcomed. However, the proposal does not include the provision of children's play space. Immediately to the rear of the site is an existing, and recently refurbished, play ground and a games pitch. These existing spaces should adequately provide for the children of the proposed development and no future provision is sought. The applicant has made a commitment to provide a financial contribution to upgrade the open space through provision of lighting, pathways and landscaping. Details of the size of the financial contribution should be provided.

30 The proposed materials of the elevations are also questioned. On the opposite side of Creek Road is another modern development containing the Wetherspoons Pub and access to Cutty Sark Station, which appears to have used similar materials to those now proposed. The existing modern building has not weathered well and seems to have suffered from its location on the busy Creek Road. Additional to these concerns about the way the existing building has weathered, there is a concern that the character of the area will suffer as these two buildings will be much the same in terms of proportions, materials and height. While uniformity in some Greenwich Town Centre Georgian style terraces provides character to the area, the uniformity between these proposed developments is unlikely to be successful.

31 It is not expected that the development will have an impact on the Strategic Viewing Corridor, given the modest scale of the proposed building. However, to ensure this is the case the applicant should confirm that the proposal does not exceed the maximum 30 metres (AOD) as required by Greenwich UDP policy D24. At present the drawings only provide the finished floor level heights. No visual assessment information in respect of the strategic view has been provided.

Sustainable design and construction

32 The applicant has responded to the GLA's request to carry out an assessment of energy demand and demonstrate the incorporation of energy efficiency and renewable energy measures. Although unfortunately, the applicant has not worked up the energy efficient design measures and not adequately demonstrated that the scheme will be inherently energy efficient. Whilst the scheme targets a 'very good' BREEAM score and may eventually perform well in reducing energy demand, the lack of information about the energy efficient design measures currently represents a weak aspect of the scheme and needs further explanation.

33 The proposal will contain a communal heating system, giving it flexibility to adapt to low carbon technologies and connection to district heating schemes. The applicant has considered combined heat and power and a range of renewable energy technologies. It proposes a 350 kW biomass boiler, which will reduce carbon emissions by 25% (i.e. 29,500 kg C per year from a baseline of 116,106 kg of C), although confirmation is needed that this takes account of carbon emissions associated transportation and processing of fuel.

34 Gas-fired combined heat and power and solar water heating are also feasible and would result in carbon emissions savings of 8.4% and 10.6% respectively. Each of the three technologies would be providing heating and there is the potential for them to conflict technically.

35 A biomass boiler could theoretically work in conjunction with a gas-fired combined heat and power system by providing supplementary heat. Wind turbines and photovoltaics are also theoretically compatible with CHP.

36 The use of roof-mounted wind turbines has not been proposed and a minimum of 12 would be needed to provide a 10% reduction in carbon emissions. Photovoltaics panels are again technically feasible however the roof area limits the ability to meet the 10% target and would incur a capital cost of approximately £742,000 according to information provided.

37 Overall, the energy strategy indicates that the scheme will have a good technological solution to reducing carbon emissions but does not adequately demonstrate that the scheme has been designed to reduce carbon emissions beyond legal the minimum. This needs clarification prior to any further consideration by the Mayor.

38 The proposed biomass boiler represent a substantial reduction in carbon dioxide emissions and is welcomed in principle, subject to the applicant clarifying that it is not possible to achieve greater carbon savings from the combination of combined heat and power with either biomass, wind or photovoltaics, and clarification of the actual carbon savings from biomass.

Access and equal opportunities

39 London Plan Policy 3A.4 states that all new housing should be built to 'Lifetime Homes' standards and that 10% should be wheelchair accessible, or easily adaptable for residents who are wheelchair users. All of the proposed units will be built to 'Lifetime Homes' standards, but only three units will be fully adapted for wheelchair units. The applicant should confirm if other units within the proposal are easily adaptable for wheelchair users in order to comply with the 10% requirement. London Plan Policy 4B.5 states that "*Boroughs should require development proposals to include an Access Statement showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed*". It is unclear if an access statement was submitted in support of the revised proposal. This matter should be clarified and an access statement should be provided to demonstrate that inclusive design principles have been taken into account in the design of the buildings and within the layout of the pedestrian routes and the public square.

40 As raised with the applicant, although the provision of the disabled car parking bays is welcomed, a plan should be submitted which shows these spaces moved closer to the lift core.

Flooding and Blue Ribbon Network

41 A flood risk assessment has been carried out. The assessment provides that flood levels be modelled in the unlikely event of a flood to determine whether the ramps to car park levels should be protected. This is a welcome additional piece of work that will help to minimise the risk of long-term damage and disruption in the event of a major flood. Subject to the Environment Agency

being satisfied with the detailed technical assessment, this offers no reason for altering the development proposals.

42 The flood risk assessment suggests that the proposals include provision for surface water attenuation. This is welcomed, but it is not clear that such matters have been included within the design and do not appear to have been secured through the use of planning conditions. The water should then be discharged to the Thames or Deptford Creek rather than to the combined sewer network. As the assessment acknowledges, the sewer network is often overloaded at times of higher rainfall. This aspect of the development should also be ensured through a condition.

Noise and air quality

43 In respect of both of these issues the Environmental Statement included a comprehensive assessment. The application raises no strategic concerns and any issues can be resolved by the local authority using planning conditions or other legal powers.

Transport for London's comments

44 The proposed car parking levels for the residential uses (0.53 spaces per unit) and other uses are in line with the parking guidelines set out in the London Plan. In addition, TfL welcomes the parking control zone already in place to deter on-street parking, the proposed car club and travel plan initiatives for the site. The proposed S.106 obligation to exclude the occupiers of the scheme from eligibility for on-street parking permits and the requirement for a travel plan are welcomed. Additionally, an obligation upon the applicant to monitor traffic/parking conditions after completion of the development will also be a requirement and should form part of the development travel plan.

45 Concerns were initially raised about the impact of the development site on the Greenwich Waterside Transit alignment and bus services along this congested section of Creek Road. It is understood that the safeguarding for transit and subsequent widening of Creek Road has now been included in the scheme which would be welcomed; however, a complete and current set of detailed scale drawings showing the widening line and the overall bus priority should be provided so this matter can be confirmed. In the absence of any quality plans to date, there is still a concern that the possible future provision of trams for Phase 3 is likely to be compromised. Due to the close proximity of the proposed building and the Norman Road / Creek Road junction, the potential turning movement envelope for a tram seems restricted and TfL considers that this turning movement may not be possible without impinging on Brewery Wharf, which is a safeguarded wharf.

46 Due to the strategic importance of Creek Road, concerns have been raised with the applicant about the highway impact of the site in the context of the cumulative impact of the many developments in the area. While it is accepted that this development is relatively small, additional information has been requested, in particular the expected number of trips generated by mode from the site. To date, this requested information has still not been provided.

47 Although no public transport assessment has been provided as part of the Transport Assessment, the overall trip generated by the site on its own is unlikely to significantly impact on the public transport capacity. However, contributions towards public transport accessibility and infrastructure improvements are requested. In addition to the land secured for Greenwich Waterside Transit alignment and bus services, and the subsequent widening of Creek Road, the section 106 agreement should also made specific references to the need to upgrade the two bus stops on Creek Road by Norman Road to full TfL's acceptable standards, including the eastbound stop unaffected by the safeguarding.

Local planning authority's position

48 The application was considered at Greenwich Council's Planning Board in late July 2006, but the application was deferred pending a site visit by the Councillors, local residents, Council planning staff and the applicant. It is expected that the application will be reconsidered at a committee meeting on 31 August. It is understood that the main matter being debated at the planning committee was the loss of Lord Hood Public House.

Legal considerations

49 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Greenwich Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's comments unless specifically stated.

Financial considerations

50 There are no financial considerations at this stage.

Conclusion

51 The principle of redevelopment of this largely under utilised site is largely supported, as it provides a suitable mixture of commercial, community and residential uses within the town centre. However, the loss of the residential hostel must be fully explained. Additionally, as the proposal involves the loss of two small areas of open space, the scheme must be better designed to provide adequate links to the proposed public square and the existing recreation ground.

52 The report raises several concerns about the proposed design, in relation to the pedestrian through links, the ground floor elevations and the use of materials.

53 Further information is required on how the development adequately accommodates the proposed waterside transit and other concerns raised by Transport for London.

54 The submission of the energy strategy is welcomed and in principle, the biomass boiler will result in a substantial reduction in carbon dioxide emissions. However, the applicant should clarify that it is not possible to achieve greater carbon savings from the combination of combined heat and power with biomass, wind or photovoltaics. Clarification should also be provided as to whether the carbon savings from biomass take into account the carbon related to transportation.

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