

# GREATER LONDON AUTHORITY

[REDACTED]  
(By email)

Our Ref: MGLA200720-8470

31 July 2020

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 20 July 2020. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

*Pre App Morden Wharf - 20/1730/O - In respect of the above planning application, currently with LB Greenwich (for 1,500 new homes etc) would you please be able to email me the Pre-App Response from the GLA?*

Our response to your request is as follows:

Please find attached the information the GLA holds within scope of your request. Please note that some names of employees are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[REDACTED]  
**Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:  
<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

GREATER **LONDON** AUTHORITY  
Development, Enterprise and Environment

**Our ref:** D&P/4562/MJ

**Date:** 27 June 2018

[REDACTED]  
Lichfields  
14 Regent's Wharf  
All Saints Street  
London N1 9RL

Dear [REDACTED]

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008**

**Site: Morden Wharf – Southern Site**

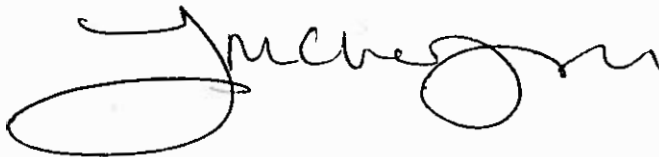
**LB: Greenwich**

**Our reference: D&P/4562**

Further to the pre-planning application meeting held on 16 May 2018, and further subsequent information, I enclose a copy of the GLA's assessment, which sets out our advice and matters that will need to be fully addressed before any applications are submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,



**Juliemma McLoughlin**  
Chief Planner

cc

[REDACTED] FL  
Senior Principal Planning Officer, Royal Borough of Greenwich, The  
Woolwich Centre, 35 Wellington Street, London SE18 6HQ

## Morden Wharf – Southern Site

in the Royal Borough of Greenwich

### The proposal










Development for approximately 1,700 residential units, together with commercial/employment development of circa 30,000 sq.m.

### The applicant



The applicant is **U+I**, the architect is **OMA**, and the agent is **Litchfields**.

### Context

1 On 16 May 2018, a pre-planning application meeting was held at City Hall including the following attendees:

GLA Group:		Strategic Planner, case officer
		Principal Strategic Planner
		Senior Strategic Planner – Urban Design
		Principal Technical Planner, Transport for London
Applicant:		U+I Group
		U+I Group
		Gerald Eve (on behalf of Morden College)
		Gardiner & Theobalds (project manager)
		Litchfields

2 Supplementary information was provided on 22 May and 20 June 2018.

3  has now left the GLA and  will now act as Principal Strategic Planner on this proposal.

4 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

### Site description

5 The 5.34 hectare site is located on the west side of the Greenwich Peninsula, bounded by Morden Wharf Road to the north, beyond which is the Northern Warehouse (in use as a bus garage), open storage areas associated with the neighbouring jetty, and the Brenntag chemical plant; the Thames and the Thames path to the west; and the Enderby Wharf site to the south, which is under development with a residential-led scheme in buildings of up to 31 storeys, including a cruise liner terminal (GLA Ref: D&P/2515b/02). The eastern boundary abuts an office supplies warehouse and vehicle parking area; a vehicle rental yard; and Tunnel Avenue, which runs alongside the A102 Blackwall Tunnel Southern Approach.

6 The site was formerly occupied by a Tate & Lyle processing facility, although most of the buildings associated with this have since been demolished. Buildings remaining include the three-storey Thames Bank House in office use (adjacent to Tunnel Avenue, at the north-east corner of the site) and adjacent car park; and the Southern Warehouse (on the northern boundary of the site), in temporary occupation by various uses, including a theatrical/exhibition prop-maker. The remainder of the site is in temporary use by various highways related businesses, with open storage, yard, parking, and minimal low-rise buildings.

7 The surrounding area is generally residential to the south and industrial to the north, with residential schemes coming forward to the east as part of the Greenwich Peninsula development.

8 This site is located within the Greenwich Peninsula Opportunity Area. The northern strip of the site (including the Southern Warehouse) and the eastern extension (including Thames Bank House), known as the 'Tunnel Avenue Frontage Land and Southern Warehouse' is designated as a Strategic Industrial Location. The majority of the site (excluding the Southern Warehouse) is a Safeguarded Wharf (known as 'Tunnel Glucose' Wharf).

9 Morden Wharf is owned by U+I, part freehold, but mainly leasehold from Morden College, a registered charity providing help and support to the elderly. A development agreement between U+I and Morden College, provides for the promotion of a residential-led mixed-use development on the Southern Site, leaving the Northern Site (not included in this proposal) as an industrial location and partly as a Safeguarded Wharf.

10 The A102 Blackwall Tunnel Southern Approach is part of the Transport for London Road Network (TLRN). The nearest section of the Strategic Road Network (SRN) is the A206 Trafalgar Road/Woolwich Road, located 1 kilometre south of the site. Currently there is no access for vehicles (except for buses) from the northern end of Tunnel Avenue to the A102. The site also has a jetty (Morden Wharf southern jetty), which the applicant has advised could be used as a potential location for a Thames Clipper pier, once repaired and a floating access deck completed. North Greenwich Jubilee Line Station is located approximately 1 kilometre north of the site, which can be accessed by pedestrians and cyclists via the footbridge connecting Tunnel Avenue to Boord Street. There are three bus services (422, 188 and 108) within approximately 500 metres of the site on Tunnel Avenue and Blackwall Lane to the south. The site currently records a public transport accessibility level (PTAL) of between 1 and 2, on a scale of 1-6, where 1 is the lowest, which indicates a poor level of accessibility.

11 On 10 May 2018, TfL was granted a Development Consent Order (DCO) by the Department for Transport for the Silvertown Tunnel. Construction could begin as early as 2019, with the new tunnel expected to open in 2023. As part of the DCO, improvements are proposed for both the Boord Street footbridge and Tunnel Avenue, in accordance with the Silvertown Tunnel Design Principles document.

## **Details of the proposal**

12 The applicant proposes up to 1,700 residential units, together with commercial space of circa 30,000 sq.m. The proposals are at an early stage and the applicant is working with the Council and the GLA to establish the principles to guide the proposals.

## **Strategic planning issues and relevant policies and guidance**

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of the Greenwich Core Strategy and Detailed Policies (2014), and the 2016 London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- National Planning Policy Framework and National Planning Practice Guidance.
- The draft London Plan 2017, which should be taken into account on the basis explained in the NPPF.
- On 5 March 2018, the Government published the draft revised National Planning Policy Framework for consultation (until 10 May 2018). This should be taken into account appropriately in accordance with its early stage of preparation.
- Opportunity Areas *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Historic environment *London Plan*
- World Heritage Sites *London Plan, World Heritage Sites SPG*
- Strategic Views *London Plan, London View Management Framework SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy; Mayor's draft Transport Strategy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Mayor's draft Environment Strategy*

## Summary of meeting discussion

15 Following a presentation of the applicant's proposals for the site, meeting discussions mainly covered strategic issues relating to the principle of development. Advice with respect to the main strategic issues is provided under the associated sections below.

16 The applicant aims to submit a hybrid application (outline and detailed elements) in early 2019, with a view to securing permission by March 2020. Any proposal is likely to be referred to the Mayor of London under Categories 1A, 1B(c) and 1C(c) of the Schedule to the 2008 Order:

- 1A "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
- 1B(c) "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres."
- 1C(c) "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London."

## Principle of development

### Opportunity Area

17 The site is within the Greenwich Peninsula Opportunity Area, identified in the London Plan as having capacity to accommodate a minimum of 13,500 new homes and 7,000 additional jobs by 2031, with the draft London Plan identifying capacity to accommodate a minimum of 17,000 new homes and an employment capacity of 15,000. The proposals would contribute to the targets.

### Residential, social infrastructure, town centre uses

18 Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Greenwich an annualised average housing completion target of 3,204 units per year between 2019/20 and 2028/29, (compared to 2,685 per year between 2015 and 2025 in the London Plan). The proposals for approximately 1,700 residential units would contribute to these targets. As identified by the applicant, a proposal of this scale in this location, with relatively poor transport connections, requires an appropriate level of social infrastructure and town centre uses in order to function as a sustainable community. This requires further discussion as the design proposals develop.

### Safeguarded wharf

19 Almost the entirety of the site is currently designated as a safeguarded wharf (known as Tunnel Glucose Wharf), excluding the Southern Warehouse and an adjacent strip of land fronting onto Tunnel Avenue. This is part of a network of wharves along the Thames that are protected for use as wharves by a Safeguarding Direction issued by the Secretary of State for Housing, Communities and Local Government.

20 London Plan Policy 7.26 'Increasing the use of the Blue Ribbon Network for freight transport' states that development proposals should protect safeguarded wharves; increase their use; and adjacent development should minimise conflicts and disturbance. Further support is provided by Policies 5.17 and 5.18 relating to waste, and 5.20 on aggregates. These policies are reflected in draft London Plan Policy SI15 'Water transport', SI18 on waste, and SI10 on aggregates.

21 The current wharves network dates from 2005, and the Mayor recently commissioned a Safeguarded Wharves Review (2018), which has published proposals for consultation until August 2018, and can therefore be given some weight. Once the consultation closes, the Mayor will consider the responses received and may propose further changes to the network. Once the issues have been considered in full by the Mayor he will submit his recommendations for safeguarding to the Secretary of State. It will then be for the Secretary of State to determine which wharves he chooses to safeguard and those he chooses to de-safeguard.

22 The current review reflects the Safeguarded Wharves Review (2011/13) proposal to de-designate the current location of the wharf (Tunnel Glucose), and designate the Northern Site as Tunnel Wharf. This proposal was uncontested and is supported by the Port of London Authority (PLA) and the GLA. An aggregates supplier (Sivyer) is currently completing lease arrangements on the Northern Site and is expected to start operations in summer 2018. In view of the uncertainty of the timing of adoption of the Review, the applicant has agreed in principle with the PLA that a section 106 agreement in relation to a satisfactory planning permission for substantial development on the Southern Site would require re-provision of a satisfactory long term safeguarded wharf on the Northern Site at the time of implementation, and that such an

agreement could be promoted either in parallel with or in advance of any planning application submission. GLA officers support this proposal, in line with the London Plan, the draft London Plan, and the Safeguarded Wharves Reviews 2011/13 and 2018.

23 As required by the London Plan and the draft London Plan, any development adjacent to the newly located wharf must minimise conflicts and disturbance between uses. It is recognised that wharf uses would be shielded to a certain degree by the Northern Warehouse, which is in continuing use as a bus depot and outside of the application site; as well as the retained Southern Warehouse within the application site, which is proposed to be retained in industrial-type use. These buildings, together with the separation distance they provide to wharf uses, plus the mitigation that would be required for the industrial-type uses within these buildings, are expected to allow potential conflicts and disturbance to be minimised; however, design development must ensure this.

#### Strategic Industrial Locations (SIL) and non-designated industrial sites

24 The 'Tunnel Avenue Frontage Land and Southern Warehouse', is located within the Greenwich West Peninsula Strategic Industrial Location (SIL), which extends beyond the site to both the south and the north. The Southern Warehouse (on the northern boundary of the site) is in temporary occupation by various uses, including a theatrical/exhibition prop-maker, while Thames Bank House office building is also in temporary occupation, together with an adjacent car park. The remainder of the non-SIL part of the site (known as the 'Riverside Land') is in temporary use by various highways related businesses, including open storage, yard, parking, with a few low-rise buildings of limited floorspace. This 'Riverside Land' part of the site was de-designated as SIL through the Greenwich Core Strategy (2014).

25 London Plan Policy 4.4 states that a rigorous approach is required to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses, including good quality and affordable space; and that any release of surplus industrial land must be planned, monitored and managed. This applies to SIL, locally significant industrial sites, and non-designated industrial sites, and Map 4.1 identifies Greenwich for managed release. London Plan Policy 2.17 states that SIL should be promoted, managed and protected as London's main reservoir of industrial and related capacity, and that proposals in SIL should be refused unless they fall within the broad industrial type activities appropriate to the function of the particular SIL in question. This SIL is identified in Table A3.1 as a Preferred Industrial Location, with suitable uses including employment workspace to meet identified needs for SMEs or new emerging industrial sectors, and small scale 'walk to' services for industrial occupiers such as workplace creches or cafes. Policy 2.17 also identifies that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities.

26 Policy E4 of the draft London Plan also seeks to ensure a sufficient supply of land and premises to meet current and future demands for industrial and related functions to be maintained, and states that any release should be facilitated through industrial intensification, co-location, and substitution set out in Policy E7 (see below). This applies to SIL, locally significant industrial sites, and non-designated industrial sites, and Greenwich is identified to 'retain' its existing industrial capacity in Table 6.2. Policy E5 of the draft London Plan supports development in SIL with light industrial use (Class B1c); general industrial use (Class B2); storage and distribution use (Class B8); other industrial-type functions, services and activities not falling within those use classes, including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets; flexible Use Class B1c/B2/B8 premises suitable for occupation by SMEs; and small-scale walk-to services for industrial occupiers, such as workplace creches or cafes. Development proposals for any

other uses should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. Furthermore, developments within or adjacent to SIL must not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. The draft London Plan does not distinguish SIL as Preferred Industrial Locations or Industrial Business Parks. Policy E7 'Intensification, co-location, and substitution...' of the draft London Plan supports mixed use developments on non-designated industrial sites (such as the 'Riverside Land' non-SIL part of the proposal site), where there is no prospect of the site being used for industrial purposes; it has been allocated for mixed use in a development plan; industrial, storage or distribution space is re-provided; or where suitable alternative accommodation is available, and subject to relocation support.

27 It is noted that Greenwich Council's Core Strategy (2014) identifies the whole of the site as part of the Greenwich Peninsula West Strategic Development Location, as a new high quality urban quarter comprising a cruise liner terminal and associated leisure, hotel and enterprise space in addition to new housing. As discussed above, the Core Strategy retains the SIL designation of the 'Tunnel Avenue Frontage Land and the Southern Warehouse', but released the remainder of the site from SIL designation for residential-led use, in line with the Greenwich Peninsula West Masterplan. It is also noted that the Core Strategy provides general protection to sites in existing or previous employment use; however, it explicitly notes that this does not apply to sites within the Greenwich Peninsula West Strategic Development Location.

28 The existing SIL within the site extends to 2.08 hectares and contains 6,326 sq.m. of floorspace, including 4,626 sq.m. of creative industry use, mostly made up of Use Class B1/B8, with an element of B1(a) office space. The applicant proposes to provide 7,880-19,500 sq.m. of Use Class B1(c), B2, and B8 floorspace, within the 2.08 hectares SIL area, with the floorspace extent to be determined through further design work, including the possibility of multi-storey provision both within the retained Southern Warehouse and new buildings. Further to Policy E4 of the draft London Plan, paragraph 6.4.5 states that as a general principle, there should be no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS, where floorspace capacity is defined as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio (whichever is the greater). On this basis, 13,000 sq.m. of industrial-type floorspace is required to be re-provided within the SIL part of the site. Subject to this, appropriate industrial servicing capacity, and further design development, the proposed uses within the SIL area are supported in principle, in line with London Plan Policies 4.4 and 2.17, and draft London Plan Policies E4, E5, and E7. It is also noted that the 2.35 hectares Northern Site (not part of the proposal site), which is designated as SIL and proposed to be designated as a safeguarded wharf (as discussed above), will be brought back into use for aggregates transport, with the existing Northern Warehouse continuing in use as a bus depot, which is welcomed.

29 The remaining 3.26 hectares of the site (non-SIL) is currently comprised primarily of open storage and parking associated with Use Class B8, with only 76 sq.m. of building floorspace. No industrial uses are currently proposed by the applicant in these areas. This is supported in line with London Plan Policies 4.4 and 2.17, and draft London Plan Policies E4, E5, and particularly Policy E7, on the basis that it has been allocated for mixed use in the development plan, and industrial-type floorspace is re-provided on the SIL part of the site. However, this is subject to development adjacent to SIL (both within and adjacent to the site) not compromising the integrity or effectiveness of SIL in accommodating industrial-type activities and their ability to operate on a 24-hour basis. This suggests an area of mixed industrial (most likely Use Class B1(c)) and residential use is appropriate in areas adjacent to SIL, providing a buffer to heavier industrial uses.



30 The applicant should also note Policy HC5 'Supporting London's culture and creative industries' and Policy E2 'Low-cost business space' of the draft London Plan, which provide support for creative industries. The retention and/or re-provision of existing creative industries on the site should be sought wherever possible, although it is recognised that these occupants are on temporary leases. Policy E2 'Low-cost business space' also states that proposals involving more than 2,500 sq.m. of business floorspace should consider the scope to provide a proportion of flexible workspace suitable for SMEs. Policy E3 'Affordable workspace' also identifies that in defined circumstances planning obligations may be used to secure affordable workspace. Considering the existing nature of both the site and current occupiers, this may be appropriate here and the applicant should consider this in discussion with Greenwich Council. Any application should also confirm lease arrangements and relocation assistance for existing occupiers.

#### Hazardous substances

31 Approximately 20 metres to the north of the site lies the Brenntag chemical plant. London Plan Policy 5.22 'Hazardous substances and installation' states that development near hazardous installations should be assessed against the Health and Safety Executive's (HSE) methodology, and that the risks should be balanced against the benefits of development.

32 The applicant states that recent HSE advice identifies that a strip approximately 50 metres wide at the north-east corner of the site would be impacted, which is nearly all within the SIL designation, including approximately half of the Southern Warehouse. Approximately half of this width is in an area (the 'inner zone') where high density housing would be subject to an 'advise against' objection, although workspace would be acceptable as long as this is predominantly non-retail and providing for no more than 100 occupants in any building, or are three or more occupied storeys in height. The remainder impacted area is made up of a 'middle zone', where housing is allowed as long as is less than 10% of the area; and an 'outer zone' where housing is allowed, although classified as 'risk level 3'.

33 The application materials should include HSE advice, and will be required to demonstrate that the proposals conform to these requirements.

#### River Thames

34 The proposals will be required to take account of London Plan and draft London Plan Policies relating to the Thames-side nature of the site. London Plan Policy 7.29 'The River Thames' states that development proposals within the Thames Policy Area should be consistent with published Thames Strategy for the particular stretch of river concerned. Draft London Plan Policy SI14 'Waterways strategic role' states that development proposals should take account of emerging Marine Spatial Plans prepared by the Marine Management Organisation, as well as Thames Policy Areas. Draft London Plan Policy SI16 'Waterways use and enjoyment' states that development proposals should improve and expand the Thames Path. Draft London Plan Policy D8 'Tall buildings' states that buildings near the Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river, which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river.

#### Summary

35 The proposal for a mixed-use development including up to 1,700 residential units and circa 30,000 sq.m. of commercial/employment uses is supported in principle, subject to

resolution of the issues raised above, in particular the re-provision of intensified industrial-type floorspace.

## **Housing**

### Affordable housing

36 London Plan Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Policy H5 'Delivering affordable housing' of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 'Threshold approach to applications' identifies a minimum threshold of 35% (by habitable room) affordable housing, or 50% on former industrial sites, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, as well as investigating grant funding, can follow the 'fast track route' set out in the SPG. This means that they are not required to submit a viability assessment or be subject to a late stage viability review. Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA.

37 According to draft London Plan Policy H6, the applicable threshold to follow for the fast track route would be 50%, since the site includes SIL and non-designated industrial land. This applies to the entire site and there would be no reason to submit separate applications for the SIL and non-SIL parts of the site, and furthermore it would be preferable for any application to include both parts of the site. The applicant has provided supplementary information setting out an argument that the non-SIL part of the site should be subject to a 35% threshold, with justification including it being neither SIL nor LSIS; has been released in the statutory development plan from employment land designation; and forms part of the Greenwich Peninsula West Strategic Development Location for a mixed use new urban quarter. While these reasons are acceptable as part of the justification for supporting mixed use development on non-designated industrial sites (as discussed above), this does not support a 35% threshold, and a 50% threshold is applicable, as required by Policy H6.

38 Consequently, if the proposal did not meet the 50% threshold, a financial viability assessment and late stage review when 75% of the units are sold or let would be required. The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of any permission being granted, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG.

39 The applicant is requested to engage with GLA officers in viability discussions prior to submission of the application. Any financial viability assessment will be robustly assessed working in partnership with the applicant, the Council and its independent assessors to ensure that the maximum contribution is secured in accordance with Policies 3.11 and 3.12 of the London Plan, the Mayor's Affordable Housing and Viability SPG, and Policies H5 and H6 of the draft London Plan. The applicant must also fully investigate options for grant funding in order to maximise the delivery of affordable housing.

40 In due course, the Council must publish the financial viability assessment in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG.

GLA officers will ensure that the assessment is made available, to ensure transparency of information in accordance with the SPG.

41 The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Affordability thresholds for all tenures must be secured in the section 106 agreement attached to any permission.

## **Urban design**

42 The proposals are at an early stage of development and no design work was presented at the meeting. The following comments are therefore intended to inform and guide future work.

43 Given the limited access opportunities into the site, the applicant should set out how the proposed layout will align with both the existing and emerging pedestrian/cycle network (including the repositioned footbridge as a result of the Silvertown Tunnel consent). Consideration should be given to the quality of the pedestrian environment along Tunnel Approach and options should be investigated to make improvements. The ability to align access points towards Central Park and North Greenwich Station will be critical in optimising housing delivery on the site, which is relatively poorly accessible. Linkages to areas to the north, including a potential pedestrian/cycle bridge over the proposed wharf, should be defined. Options to improve north-south movement addressing the barrier of the Southern Warehouse should be addressed. The southern boundary of the site must respond to the tall buildings of up to 31 storeys proposed as part of the Enderby Wharf site, and the proposed cruise ship terminal, maximising pedestrian/cycle linkages.

44 As discussed above, the design and layout of the proposals should respond appropriately to neighbouring SIL uses to avoid potential conflicts, and ensure that residential uses are located to optimise quality of outlook and amenity. In particular, this should take account of London Plan Policy 7.14 and draft London Plan Policy SI1 'Improving air quality', and London Plan Policy 7.15 and draft London Plan Policy D13 'Noise'.

45 Opportunities to provide legible and accessible routes to the Thames Path should be maximised and the arrangement of building typologies should respond positively to the river edge in terms of form, scale and active ground floor frontages. Draft London Plan Policy D8 'Tall buildings' states that buildings near the Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river that encloses its open aspect and riverside public realm, or adversely affect strategic or local views along the river. The heights and massing of blocks should also have regard to the wider Greenwich Peninsular Masterplan and views along Tunnel Approach.

46 In the absence of any established urban grain, the scheme should be designed to accommodate a range of housing typologies to promote housing choice, high quality amenity, and varied character. The arrangement of blocks should be informed by a strong place-making strategy defined by sunlit and high quality zones of public amenity, both along the river and within the interior of the site; human scaled and active street frontages; and an appropriate balance of public and private space. A simple hierarchy of public realm should be developed to define pedestrian and residential movement through the site. This should include spaces with an appropriate balance of size and enclosure to form arrival/threshold zones, river path amenity zones, and commercial hubs within the site.

47 A good quality Design Code has been shared with the applicant. Key requirements of the Design Code are:

- Parameter plans to include indicative distribution of uses and residential layouts;
- Public realm hierarchy, including character areas and pedestrian/cycle connections, within wider context of Greenwich Peninsula;
- Typical street sections (building enclosure/pavement widths);
- Maximum contiguous lengths of inactive (servicing) frontage;
- Minimum % of dual aspect units;
- Maximum units per core ratio;
- Minimum floor to ceiling heights;
- Car parking contained within podiums, and any on-street parking integrated into the public realm;
- Hierarchy of building heights to respond to public realm hierarchy;
- Articulation of buildings (base/middle/top);
- Indicative townscape views of key spaces and buildings;
- Long range views from the Thames, with cumulative views of the Greenwich Peninsula.

#### World Heritage Site, strategic views and historic environment

48 London Plan Policy 7.10 'World Heritage Sites' and draft London Plan Policy HC2 state that development should conserve, promote and enhance their Outstanding Universal Value. Further guidance is provided in the Mayor's supplementary planning guidance 'London World Heritage Sites - Guidance on Settings', and the Maritime Greenwich World Heritage Site Management Plan. The Maritime Greenwich World Heritage Site (WHS) lies approximately one kilometre to the south-west and the proposals will be highly visible from the WHS across the open expanse of the Thames. As a place of Outstanding Universal Value, the WHS is a designation of the highest order, and as such it is an important planning consideration that should be assessed as the proposals develop.

49 Policy HC4 'London View Management Framework' of the draft London Plan, and London Plan Policy 7.12, states that development should not harm strategic views, with further detail provided in the Mayor's supplementary planning guidance 'London View Management Framework' (LVMF SPG). The proposals may appear peripherally in some LVMF views, which should be assessed as the proposals develop.

50 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses", and in relation to conservation areas, special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area". Policy HC1 'Heritage conservation and growth' of the draft London Plan, and London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm. The proposals are likely to impact other heritage assets, which should be assessed as the proposals develop.

51 A full assessment of heritage assets and strategic views, and the impact of the proposals upon them, will be required in the application materials within a Townscape, Heritage and Visual Impact Assessment (THVIA), or similar, including verified views, some fully rendered.

## Transport

52 Given the scale of development; the poor PTAL rating of the site (1-2); the applicant's desire to provide car parking; and the site's location close to a very congested part of the TLRN and the consented Silvertown Tunnel; it is likely that TfL will request that detailed strategic modelling is completed to support the application. TfL provide a strategic modelling screening pre-app service, which the applicant should commit to promptly in order to avoid unnecessary delays. A more general pre-application advice service is also available: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-advice>. The aim of the service is to help ensure that the application complies with the London Plan and the draft London Plan and the Mayor's draft Transport Strategy.

53 The proposals are at an early stage of development and limited transport information was presented at the meeting. The following comments are therefore intended to inform and guide future work. Nevertheless, it is expected that the application would be supported by a transport assessment (TA), prepared in accordance with TfL guidance (<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>).

54 The scope of impact assessment on the local transport network, including the SRN/TLRN and public transport network, will be discussed in more detail in a dedicated TfL pre-application meeting; however, this should consider the impact of the development (and cumulative schemes) on all modes of transport, both during construction and at key stages of occupation if the development is phased. For the public TA, the applicant will be required to undertake a detailed trip generation assessment of the site by all modes, and distribute these trips across different routes and services by origin and destination.

55 A review of the TA and impacts of the proposal will determine whether there is a requirement for mitigation or contributions towards walking, cycling, highway or public transport improvements.

56 At the meeting, the applicant advised that car parking would be provided as part of the scheme at a ratio of up to 0.35 spaces per unit, since provision is seen as important to support the viability of the scheme, and is at a level previously approved for other schemes in the area. Although this level of car parking meets current London Plan parking standards, TfL would expect the level to be reduced significantly to better meet draft London Plan Policy T6.1 and Table 10.3, which identifies sites within Inner London Opportunity Areas to be car-free (other than Blue Badge parking). A reduction in car parking provision is also supported by draft London Plan Policy T2 'Healthy Streets', as this will reduce congestion and traffic levels, whilst improving the experience and balance of space given to all users of the site, providing greater opportunities to dwell, walk and cycle in a safer, less polluted and more pleasant environment, helping to achieve mode share and active travel targets.

57 The applicant is encouraged to consider the use of car clubs for both residential and commercial occupiers of the development to facilitate a reduction in the need for car parking. Additionally, as the site is currently located within a controlled parking zone (CPZ), the applicant should secure removal of future occupant's right to on-street parking permits in the surrounding CPZ (excluding Blue Badge spaces) through an appropriate legal mechanism. The proposal should also aim to provide adequate Blue Badge spaces (one for 10% of units) and both active and passive electric vehicle charging points, in line with draft London Plan policy, within the car parking areas. A car parking design and management plan should be provided with the application, in line with draft London Plan Policy T6.

58 The provision of cycle parking across all land uses should be compliant with the minimum standards set out in draft London Plan Policy T5 and Table 10.2, and should be designed in accordance with the guidance set out in London Cycling Design Standards. Details of the type of cycle parking should be provided within the application. Changing and storage facilities for employees of the commercial units should be provided, and at least 5% of all spaces should be able to accommodate larger or adaptable cycles, for example through the use of Sheffield stands.

59 As part of the Silvertown Tunnel works, Boord Street footbridge will be realigned and improved, as well as Tunnel Avenue. A new southbound bus stop will also be provided on Tunnel Avenue. The applicant is aware of the urban realm improvements associated with the Silvertown Tunnel and should ensure that the proposed development responds and integrates fully with the proposals.

60 The use of Legible London signage within the vicinity of the site is encouraged and should be explored by the applicant as part of a wayfinding strategy. The applicant should also include details in the TA to address compliance with the 'Healthy Streets' approach.

61 The applicant should also provide an overview of possible pedestrian and cyclist desire lines to surrounding nodes, including North Greenwich Station, local bus stops on Tunnel Avenue and Blackwall Lane, and amenities such as schools and shops. The TA should include an assessment of the safety and accessibility of all these routes, preferably as part of a pedestrian environment review system (PERS) assessment, and cycle level of service (CLOS) assessment.

62 As part of the application, further consideration should be given to the operational needs of the site. The three existing access points are to be retained and careful consideration is needed to ensure conflicts with HGVs serving existing and proposed operational industrial premises are minimised. Maintaining appropriate visibility from access points will be critical to pedestrian and cyclist safety.

63 A detailed delivery and servicing plan (DSP) should be provided, in line with London Plan Policy 6.11 and draft London Plan Policy T7. The application should also be supported by separate residential and framework travel plans, and a full construction logistics plan. Further guidance can be found on the TfL website.

64 The Mayoral CIL applies and a charge of £35 per square metre of gross internal area (GIA) in the Royal Borough of Greenwich. The CIL would be payable on commencement, and collected by the Council.

## **Climate change**

### Energy

65 The energy strategy was not discussed at the meeting; however, GLA energy assessment planning guidance is available on the GLA website, which provides information on targets taking into account Part L 2013 of the Building Regulations: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>. The applicant is advised to provide a draft energy strategy to GLA officers for review and comment at any point prior to submission.

## Flood Risk

66 As a site adjacent to the Thames, the application of London Plan Policy 5.12 and draft London Plan Policy SI12 'Flood Risk Management' is an important consideration. A flood risk assessment will be required and the applicant should discuss the proposals with the Environment Agency at the earliest opportunity, particularly in relation to its Thames Estuary 2100 Plan. The application of sustainable drainage strategies will also be important.

## **Conclusion**

67 GLA officers welcome the opportunity for early engagement with the applicant on the proposals for this large site and currently under-used site. The principle of the proposal is supported; however, issues relating to safeguarded wharves; Strategic Industrial Land; non-designated industrial land; hazardous substances; the River Thames; housing; affordable housing; urban design; World Heritage Site, strategic views and historic environment; transport; and climate change should be addressed. Further pre-application discussions are required as the proposals develop.

---

for further information, contact the GLA Planning Team:

**Juliemma McLoughlin, Chief Planner**

██████████ @london.gov.uk

██████████, **Principal Planner**

██████████ @london.gov.uk

██████████ **Senior Strategic Planner, Case Officer**

██████████ @london.gov.uk

---

## Morden Wharf – Southern Site

in the Royal Borough of Greenwich

### The proposal

Development for approximately 1,700 residential units, together with commercial/employment development of circa 30,000 sq.m.

### The applicant

The applicant is **U+I**, the architect is **OMA**, and the agent is **Litchfields**.

### Context

1 On 5 July 2018, a follow-up pre-planning application meeting was held at City Hall including the following attendees:

GLA Group:	<div></div> <div></div> <div></div>	Senior Strategic Planner, case officer Principal Strategic Planner Area Manager South, Housing & Land
Applicant:	<div></div> <div></div> <div></div> <div></div> <div></div>	U+I Group OMA OMA Lichfields Lichfields
LPA:	<div></div>	Senior Principal Planning Officer, LB Greenwich

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application. This report should be read in conjunction with the initial pre-application advice report, reference GLA/4562/Pre-application (27 June 2018).

### Summary of meeting discussion

3 Following a presentation of the applicant's proposals for the site, meeting discussions focussed on housing and urban design. Advice with respect to these strategic issues is provided under the associated sections below.

### Strategic planning policy and guidance update

4 In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance (SPG). This must now be read subject to the decision in R(McCarthy & Stone) v. Mayor of London, in which the High Court granted a declaration that



references in the SPG to late stage review were unlawful, to the extent that late stage review is recommended in all cases, irrespective of the time which is likely to be taken before a scheme is built out.

5 On 24 July 2018, the Government published the revised National Planning Policy Framework.

6 On 13 August 2018 the Mayor published a version of the draft London Plan that includes his minor suggested changes. These suggested changes have been prepared following a review of consultation responses, and consist of clarifications, corrections and factual updates to the draft London Plan that will help to inform the Examination in Public. See: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0>.

## Housing

### Affordable housing

7 As stated in the initial pre-application advice report, London Plan Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Policy H5 'Delivering affordable housing' of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 'Threshold approach to applications' identifies a minimum threshold of 35% (by habitable room) affordable housing, or 50% on former industrial sites, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, as well as investigating grant funding, can follow the 'fast track route' set out in the SPG. This means that they are not required to submit a viability assessment or be subject to a late stage viability review. Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA.

8 According to draft London Plan Policy H6 (as published on 1 December 2017), the applicable threshold to follow for the fast track route would be 50%, since the site includes SIL and non-designated industrial land. As stated in the initial pre-application advice report, this applies to the entire site and there would be no reason to submit separate applications for the SIL and non-SIL parts of the site, and furthermore it would be preferable for any application to include both parts of the site. At the initial pre-application meeting, the applicant provided supplementary information setting out an argument that the non-SIL part of the site should be subject to a 35% threshold, with justification including it being neither SIL nor LSIS; has been released in the statutory development plan from employment land designation; and forms part of the Greenwich Peninsula West Strategic Development Location for a mixed use new urban quarter. While these reasons were accepted as part of the justification for supporting mixed use development on non-designated industrial sites, the initial pre-application advice report advised that this did not support a 35% threshold, and a 50% threshold would be applicable, as required by Policy H6.

9 Subsequently, the Mayor has published a version of the draft London Plan that includes his minor suggested changes. In response to consultation on the draft London Plan, Policy H6 of the draft London Plan is proposed to be amended to state that the threshold will be "50% for Strategic Industrial Locations, Locally Significant Industrial Sites and other Non-Designated

*Sites appropriate for residential uses (in accordance with Policy E7 'Industrial intensification, co-location and substitution') where the scheme would result in a net loss of industrial capacity". Paragraph 6.4.5 of the draft London Plan states that "floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio". In this case, it is most appropriate to use a 65% plot ratio, and accordingly, the proposal would be required to re-provide approximately 35,000 sq.m. of industrial-type floorspace (based on a 65% plot ratio of the entire site), in order for the 35% threshold to apply and enable the application to follow the fast track route.*

10 If the proposal did not qualify for the fast track route, a financial viability assessment, and late stage review when 75% of the units are sold or let, would be required. The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of any permission being granted, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. Further detail on the intended timescale and phasing of the proposals should be provided, and mid-term reviews may be required as per the SPG, triggered prior to the implementation of phases. These would take a similar approach to the early review, taking account of any additional affordable housing provided through earlier reviews.

11 The applicant is requested to engage with GLA officers in viability discussions, including the threshold approach, prior to the submission of any application. Any financial viability assessment will be robustly assessed, working in partnership with the applicant, the Council and its independent assessors to ensure that the maximum contribution is secured in accordance with Policies 3.11 and 3.12 of the London Plan, the Mayor's Affordable Housing and Viability SPG, and Policies H5 and H6 of the draft London Plan. The applicant must also fully investigate options for grant funding in order to maximise the delivery of affordable housing.

12 In due course, the Council must publish any submitted financial viability assessment, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information in accordance with the SPG.

13 The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Affordability thresholds for all tenures must be secured in the section 106 agreement attached to any permission. London Living Rent benchmark data is available at: <https://www.london.gov.uk/what-we-do/housing-and-land/renting/london-living-rent>.

## **Urban design**

14 OMA presented early design proposals for the site having been appointed 7 weeks prior to the meeting. Chetwoods architects are working on the SIL proposals; however, they did not attend the meeting. The following comments are intended to inform and guide future work.

### Site layout

15 The applicant had not yet formally engaged with the Environment Agency at the time of the meeting, and the design approach to the river wall was not yet known. It is noted that the level of the wall may need to be raised, and/or a 16 metre set-back to buildings may be required. Further information should be provided on this matter as the scheme develops.

16 Canals and ponds are proposed in response to the flood risk affecting parts of the site, which would introduce water to areas further from the river, also providing visual and potentially practical amenity. The introduction of more water to the site in response to the threat of flooding appears paradoxical, and in order to provide capacity for potential flood water, suggests that water levels would need to be low in relation to the surrounding landscape for most of the time. This could raise safety issues, requiring mitigation in the form of barriers around the waterways. Water bodies also require maintenance, which may impact service charges. The proposed routes through the site also appear narrow, suggesting that it would be difficult to include water bodies, as well as access and circulation routes. Further investigation of this is required as the proposals develop.

17 As stated at the meeting, the applicant proposes a single link to the residential area from the north, through the SIL from Tunnel Avenue. GLA officers suggested that further links to the south should be investigated, from Telcon Road and Christchurch Way, which now primarily serve residential uses, and in particular linking to Enderby Wharf. It is recognised that level changes may raise challenges; however, considering the poor connectivity of the site, additional links are particularly important, including for pedestrians and cyclists. Potential connections to the proposed raised walkway as part of the Knight Dragon Greenwich Peninsula masterplan should also be investigated.

18 As discussed at the meeting, some of the residential blocks are in close proximity to existing industrial uses in SIL, as well as the proposed SIL use within the site, which raises concerns about conflicts between these uses. As discussed at the initial pre-application meeting, development adjacent to SIL (both within and adjacent to the site) must not compromise the integrity or effectiveness of SIL in accommodating industrial-type activities and their ability to operate on a 24-hour basis. This suggests an area of mixed industrial (most likely incorporating Use Class B1(c)) and residential use is appropriate in areas adjacent to SIL (but not within SIL), providing a buffer to heavier industrial uses. The indicative proposals include planted screens as a form of mitigation; however, this must effectively address potential noise/air quality impacts, and other forms of mitigation are likely to be required. The proposals to include active uses to the southern frontage of the Southern Warehouse are supported, subject to the retention of appropriate SIL uses. A limited element of retail/leisure use would be appropriate at the western end of the Southern Warehouse fronting onto the River and the Thames Path, subject to appropriate design/layout.

### Density

19 London Plan Policy 3.4 and draft London Plan Policy D6 'Optimising housing density' seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The optimum density of a development should result from a design-led approach to determine the capacity of the site. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in draft London Plan Policies D4 'Housing quality and standards' and D2 'Delivering good design'.

20 The proposals would have a density of approximately 521 units per hectare (based on 1,700 units over 3.26 hectares, excluding the SIL parcel), which is above the guidance ranges in Table 3.2 of the London Plan (based on the site's PTAL of 1-2, and if classified as an emerging 'central' setting). It is also above the threshold for a greater level of design scrutiny in Policy D6 of the draft London Plan. While the draft London Plan recognises that development sites will usually need to be developed at densities above those of the surrounding areas to accommodate the required level of growth, the very high density proposed will require the

proposals to be very rigorously assessed in terms of design quality and infrastructure capacity, as set out in draft London Plan Policy D6. The planned Design Council Cabe design review is welcomed and GLA officers look forward to the subsequent report. Infrastructure assessments will also be required, as will detailed strategic transport modelling. Further examination of the density proposed and impacts/mitigation is required.

### Height and massing

21 The heights proposed of the lower elements are 4-14 storeys, with four taller buildings of 19, 24, 30 and 38 storeys. The applicant justified the proposed taller buildings as being adjacent to the three permitted tall buildings of up to 31 storeys at Enderby Wharf, as well as adjacent to the permitted cruise terminal. GLA officers noted that the tall buildings at Enderby Wharf were partly justified to enable the delivery of the cruise terminal, and the proposal for buildings of a greater height than at Enderby Wharf raise some concerns, and will require rigorous justification, especially considering the very high density of the proposals, and the poor accessibility to public transport. Detailed testing should examine how the heights proposed respond to the existing and emerging context in Greenwich and in surrounding boroughs, notably the tall building clusters around Greenwich peninsular and the Isle of Dogs. As discussed in the initial pre-application advice report, further investigation is required of the impact of the proposals on LVMF views and the Maritime Greenwich World Heritage Site.

22 Draft London Plan Policy D8 'Tall buildings' states that buildings near the Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river, which encloses its open aspect and riverside public realm, or adversely affects strategic or local views along the river.

23 As the proposals develop, the arrangement of blocks should be informed by a strong place-making strategy defined by sunlit and high quality zones of public amenity, both along the river and within the interior of the site; human scaled and active street frontages; and an appropriate balance of public and private space. Optimising residential quality should be a key consideration in the massing of the residential components of the scheme.

24 Further discussions are required to demonstrate how the architecture will contribute to the principle of establishing character areas as set out above.

## **Conclusion**

25 GLA officers welcome the opportunity for ongoing engagement with the applicant. The principle of the proposal is supported; however, issues raised in this report in relation to housing and urban design require further discussion, in addition to the issues raised in the initial pre-application advice report. Further pre-application discussions are required as the proposals develop.

---

for further information, contact the GLA Planning Team:

**Juliemma McLoughlin, Chief Planner**

██████████ ughlin@london.gov.uk

**John Finlayson, Head of Development Management**

██

██

██████████ ll@london.gov.uk

██████████, **Senior Strategic Planner, Case Officer**

██████████ @london.gov.uk

---

## Morden Wharf – Southern Site

in the Royal Borough of Greenwich

### The proposal

Development for approximately 1,500 residential units, together with approximately 5,000 sq.m. of non-residential uses, and Strategic Industrial Location uses of approximately 16,000 sq.m. (GEA).

### The applicant

The applicant is **U+I**, the architect is **OMA**, and the agent is **Lichfields**.

### Context

1 On 23 November 2018, a follow-up pre-planning application meeting was held at City Hall, including the following attendees:

GLA Group:	<div></div> <div></div>	Principal Strategic Planner, case officer Senior Strategic Planner – Urban Design
Applicant:	<div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div>	U+I Group OMA OMA Chetwoods Chetwoods Plan-it Gerald Eve Lichfields Lichfields
LPA:	<div></div> <div></div>	Senior Principal Planning Officer, LB Greenwich LB Greenwich

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application. This report should be read in conjunction with previous pre-application advice reports, reference GLA/4562/Pre-application (27 June 2018), and Pre-application GLA/4562/02 (14 August 2018).

### Summary of meeting discussion

3 Following a presentation of the applicant's proposals for the site, meeting discussions focussed on urban design. Advice with respect to this is provided below.

## Urban design

4 OMA and Chetwoods presented the latest proposals. The following comments are intended to inform and guide future work.

5 The emerging proposals for the Strategic Industrial Location (SIL) part of the site are welcomed and supported. The two-storey Chetwoods warehouse/logistics building relates well to the massing of the adjacent proposed commercial block and residential blocks beyond, and gives the potential for a distinctive and highly visible elevation marking the entrance to the site when viewed from Tunnel Avenue and Blackwall Tunnel Southern Approach. The potential eastern extension of the Southern Warehouse with SME units within the SIL is also supported. As detailed in the initial pre-application advice report (Reference: GLA/4562/Pre-application, 27 June 2018), approximately 13,000 sq.m. of SIL uses are required to be re-provided.

6 As discussed at the meeting, GLA officers have significant concerns relating to the layout and massing strategy for the proposed residential areas of the site. It is recognised that the site raises challenges; however, the proposals as currently detailed are not considered to offer a satisfactory solution.

7 The site has limited access points, restricting opportunities for creating connections with neighbouring sites and the wider context. Improved connections to the south are essential to support the high densities proposed, and to ensure safe, inclusive and legible access for pedestrians and cyclists. While uncertainties concerning the proposals for the final phase of Enderby Wharf are recognised, links to the rear of Enderby Wharf should be prioritised, providing connections to further public transport facilities, including Maze Hill Station.

8 The main point of access to the site from Tunnel Approach needs to successfully balance vehicular/servicing/cycle and pedestrian access. The applicant has provided an indication of how this will be achieved; however, this requires further development to demonstrate how pedestrian access into the site has been prioritised, particularly at the eastern end of the route.

9 The quantum of car parking is under discussion with TfL, taking account of the limitations on public transport connections, and the targets in the London Plan and draft London Plan. However, the quantum proposed, together with the proposal to route all vehicular access through the north of the site, risks being detrimental to the creation of accessible and people-focused public realm. The proposal for underground car parking to the north of the site is supported; however, the raised podium configuration with two storeys of car parking above an undercroft results in spaces that are likely to feel dark and enclosed, providing no real amenity value and raising security and safety concerns. This also results in poorly defined edges to the surrounding public realm, a poor relationship to the adjacent Enderby Wharf site, and gives an overly dominant appearance to the car park podium. This also results in greater height and prominence to the proposed tall buildings above. The applicant should investigate an alternative layout to reduce the prominence of car parking and eliminate the undercroft, with improved and better defined public space. The expected revisions to the Enderby Wharf site provide an opportunity to work with the neighbouring landowner to create a high quality piece of public realm that links the two sites together.

10 The layout of residential blocks and the resulting sequence of public realm is currently unclear and appears to be poorly conceived. The plans do not provide a clear hierarchy of public realm and shared residential amenity space, with public spaces poorly defined. As proposed, 'residential gardens' allow public access, the 'High Street' is of restricted width and

poorly defined on its southern side, and the 'community heart' appears to have no focus. Officers are not convinced that the streets would be sufficiently scaled to support the height of buildings proposed. While the 'riverfront park' offers the potential to be a high quality public space, it is currently poorly defined by adjacent buildings. The size of the site gives the opportunity to explore a more varied range of housing typologies, including courtyard blocks, mews housing, deck access, and ground/first floor duplexes, with blocks that better define public and private spaces. The justification for buildings of significant height and massing is questioned, and alternatives to achieve the proposed densities should be investigated. Officers are also concerned that the scope of an outline application would be insufficient to provide certainty of architectural quality. The applicant should also explore options to improve the level of active, sunlit public realm; improve levels of active frontage; with more slender building proportions; efficient floor plates of no more than 8 units per core; and a clear definition between the base/middle/top of buildings.

11 The applicant stated that the current segregation of tenures, with affordable blocks to the rear of the site adjacent to industrial uses, will be subject to change. This is essential to meet the requirements of London Plan and draft London Plan policies intended to achieve mixed and balanced communities. The blocks to the rear of the site also have very limited views towards the river, which amendments to the layout should seek to address.

12 The extent of the outline element raises some concerns, particularly the tall buildings proposed, and a more extensive detailed element would enable the applicant to demonstrate the quality of the proposals. The outline element should be supported by a detailed design code and parameter plans, which should set out (as a minimum) connections with the wider context; pedestrian/cycle routes; vehicle/servicing access routes; dimensions of public realm; character areas; location and legibility of main entrances to cores; individual front doors for ground floor units; maximum lengths of inactive frontage; minimum % of dual aspect, with the aim to target 75%; indicative block layouts and range of typologies; location and sizing of shared private amenity spaces; orientation of units; minimum space standards; and floor to ceiling heights.

13 The townscape views provided from the Maritime Greenwich World Heritage Site indicate that the development would be appreciated as part of a cluster together with the consented Enderby Wharf towers; however, this should be considered together with any emerging revised proposals for that site. Townscape and longer range views analysis should be undertaken with high quality visuals to give an indication of the visual impact, including proposed materials treatment.

## Conclusion

14 GLA officers welcome the opportunity for ongoing engagement with the applicant. The principle of the proposal is supported; however, issues raised require further discussion.

---

for further information, contact the GLA Planning Team:

**Juliemma McLoughlin, Chief Planner**

██████████@london.gov.uk

**John Finlayson, Head of Development Management**

██████████@london.gov.uk

██████████, Principal Planner

██████████@london.gov.uk

██████████ Principal Strategic Planner, Case Officer

██████████@london.gov.uk

---

## Morden Wharf – Southern Site

in the Royal Borough of Greenwich

### The proposal

A hybrid planning application:

Outline planning permission with all matters reserved, for the demolition of buildings (except the Southern Warehouse) and phased mixed-use redevelopment comprising up to 1,505 residential dwellings in buildings up to 37 storeys; up to 17,958 sq.m. of commercial floorspace (Use Class A1/A2/A3/A4/B1/B1c/B2/B8/ D1/D2); and associated public realm, open space, and access arrangements.

Detailed planning permission for change of use of part of the Southern Warehouse from Use Class B2/B8 to A3/A4 (1,050 sq.m.); refurbishment (including mezzanines) and external alterations to part of the Southern Warehouse (1,762 sq.m.); change of use of the Jetty to public realm, installation of public art, and Gloriana visitor centre (Use Class D1); access; landscaping and public realm works.

### The applicant

The applicant is **U+I**, the architect is **OMA**, and the agent is **Lichfields**.

### Context

1 On 26 November, a follow-up pre-planning application meeting was held at City Hall including the following attendees:

GLA Group:	[REDACTED]	Principal Strategic Planner, case officer
	[REDACTED]	Principal Strategic Planner – Urban Design
LPA:	[REDACTED]	RB Greenwich
Applicant:	[REDACTED]	Lichfields
	[REDACTED]	Lichfields
	[REDACTED]	U+I
	[REDACTED]	U+I
	[REDACTED]	OMA
	[REDACTED]	OMA
	[REDACTED]	Chetwoods
	[REDACTED]	Planit
	[REDACTED]	Gerald Eve
	[REDACTED]	Tavernor Consultancy
	[REDACTED]	Ramboll

2 Supplementary information was provided on 3 and 9 December 2019.

3 This is the fourth formal pre-application advice report. Pre-application advice reports were issued on 27 June 2018, 14 August 2018, and 10 December 2018. Due to the time that has



elapsed since the first pre-application meeting, and the evolution of draft London Plan policy during this period, this report re-considers areas where policy and the proposal have evolved. The applicant has undertaken separate discussions with Transport for London.

4 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

## Details of the proposal

5 In addition to the description above, the applicant has provided the following draft accommodation schedule:.

<b>Table 1: Proposed Development Area Schedule</b>				
<b>Uses</b>	<b>Detailed</b>	<b>Outline</b>	<b>Total</b>	<b>Notes</b>
	<b>GIA sq.m.</b>	<b>GIA sq.m.</b>	<b>GIA sq.m.</b>	
Residential Dwellings (C3)	0	130,189	130,189	Excluding basements
Food and Drink / Drinking Establishment (A3/A4)	1,050	0	1,050	SW1 (detailed)
Commercial (B1c/B2/B8)	1,762	12,210	13,972	SW2 (detailed) & SW4 & W01 (outline)
Commercial (B1/B2)	0	2,220	2,220	B01 (L01-L04)
Retail, Commercial and Community (A1/A2/A3/B1/B2/D1)	0	1,059	1,059	B01 (LG-UG)
Flexible Retail, Commercial, Community and Leisure (A1/A2/A3/A4/B1/D1/D2)	0	2,469	2,469	B02-B08 & T1-T4: - up to 907 sq.m GIA could be D1/D2 - up to 1,794 sq.m GIA could be A4 - up to 2,049 sq.m GIA could be B1 - up to 2,469 sq.m GIA could be A1/A2/A3
<b>Total</b>	<b>2,812</b>	<b>148,147</b>	<b>150,959</b>	

## Strategic planning issues and relevant policies and guidance

6 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of the Greenwich Core Strategy and Detailed Policies (2014), and the 2016 London Plan (Consolidated with Alterations since 2011).

7 The following are also relevant material considerations:

- The National Planning Policy Framework 2019 and National Planning Practice Guidance.
- The draft London Plan consolidated suggested changes version (July 2019). The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor and this was published on the GLA website on 21 October 2019. In line with paragraph 48 of the NPPF, the weight attached to the draft London Plan should reflect the stage of its preparation; the extent to which there are

unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF. The 'Intend to Publish' version is expected to be published in late December 2019, prior to submission to the Secretary of State and the Greater London Assembly.

- In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance (SPG). This must now be read subject to the decision in *R(McCarthy & Stone and others) v. Mayor of London*.

8 The relevant issues and corresponding policies are as follows:

- |                        |   |
|------------------------|---|
| • Opportunity Areas    | <i>London Plan; draft London Plan</i>   |
| • Housing              | <i>London Plan; draft London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing   | <i>London Plan; draft London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG</i>  |
| • Urban design         | <i>London Plan; draft London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i>                   |
| • Historic environment | <i>London Plan; draft London Plan</i>   |
| • World Heritage Sites | <i>London Plan; draft London Plan; World Heritage Sites SPG</i>   |
| • Strategic Views      | <i>London Plan; draft London Plan; London View Management Framework SPG</i>   |
| • Inclusive design     | <i>London Plan; draft London Plan; Accessible London: achieving an inclusive environment SPG</i>  |
| • Transport            | <i>London Plan; draft London Plan; the Mayor's Transport Strategy</i>   |
| • Climate change       | <i>London Plan; draft London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy</i>  |

## Principle of development

### Residential use and social infrastructure

9 Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Greenwich a ten year housing completion target of 32,040 units per year between 2019/20 and 2028/29, (compared to 26,850 between 2015 and 2025 in the London Plan). The Draft London Plan Examination in Public Panel Report recommends that this figure is revised to 28,240.

10 The proposals for up to 1,505 residential units would contribute to these targets. A proposal of this scale in a location with relatively limited accessibility requires an appropriate level of social infrastructure and supporting uses in order to function as a sustainable community. The applicant has been discussing social infrastructure provision with the Council, including nurse space, community space, and possibly a GP surgery. Provision of social infrastructure within the site should be fully addressed in the application materials, and is strongly supported.

### Safeguarded wharf

11 Almost the entirety of the site is currently designated as a safeguarded wharf (known as Tunnel Glucose Wharf), excluding the Southern Warehouse and an adjacent strip of land fronting onto Tunnel Avenue. This is part of a network of wharves along the Thames that are protected for use as wharves by a Safeguarding Direction issued by the Secretary of State for Housing, Communities and Local Government.

12 London Plan Policy 7.26 'Increasing the use of the Blue Ribbon Network for freight transport' states that development proposals should protect safeguarded wharves; increase their use; and adjacent development should minimise conflicts and disturbance. Further support is provided by Policies 5.17 and 5.18 relating to waste, and 5.20 on aggregates. These policies are reflected in draft London Plan Policy SI15 on water transport, SI7 on waste, and SI10 on aggregates.

13 The current wharves network dates from 2005, and the Mayor has been undertaking a review of the network. A suite of documents for the Round One public consultation was published in August 2018; and the Round Two public consultation, proposing minor changes to the boundaries of some wharves (not including Tunnel Glucose Wharf), was published in August 2019 and closed in October 2019. Following consideration of submissions received, the Mayor will submit his recommendations for safeguarding to the Secretary of State, expected to be in early 2020. It will then be for the Secretary of State to determine if they support the recommendations, although there is no set timescale for this.

14 The current Safeguarded Wharves Review reflects the previous review proposal to de-designate the current location of the wharf (Tunnel Glucose), and designate the adjacent Northern Site as Tunnel Wharf. This proposal was uncontested and is supported by the Port of London Authority (PLA) and the GLA. In view of the uncertainty of the timing of adoption of the Review, it is understood that the applicant has agreed in principle with the PLA that a section 106 agreement in relation to a satisfactory planning permission for substantial development on the Southern Site would require re-provision of a satisfactory long term safeguarded wharf on the Northern Site at the time of implementation. GLA officers support this proposal, in line with the London Plan, the draft London Plan, and the Safeguarded Wharves Reviews 2011-13 and 2018-19.

15 As required by the London Plan and the draft London Plan, any development adjacent to the newly located wharf must minimise conflicts and disturbance between uses. It is recognised that wharf uses would be shielded to a certain degree by the Northern Warehouse, which is in continuing use as a bus depot and outside of the application site; as well as the retained Southern Warehouse within the application site, mostly in industrial-type use. These buildings, together with the separation distance they provide to wharf uses, plus the mitigation that would be required for the industrial-type uses within these buildings, are expected to allow potential conflicts and disturbance to be minimised; however, the application materials must fully detail this, and any permission will need to secure this appropriately.

### Strategic Industrial Locations (SIL) and non-designated industrial sites

16 The 'Tunnel Avenue Frontage Land and Southern Warehouse', is located within the Greenwich West Peninsula Strategic Industrial Location (SIL), which extends beyond the site to both the south and the north. The Southern Warehouse (on the northern boundary of the site) is in temporary occupation by various uses, including a theatrical/exhibition prop-maker, while

Thames Bank House office building is also in temporary occupation, together with an adjacent car park. The remainder of the non-SIL part of the site (known as the 'Riverside Land') is in temporary use by various highways related businesses, including open storage, yard, and parking, with a few low-rise buildings of limited floorspace. This 'Riverside Land' part of the site was de-designated as SIL through the Greenwich Core Strategy (2014).

17 London Plan Policy 4.4 states that a rigorous approach is required to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses, including good quality and affordable space; and that any release of surplus industrial land must be planned, monitored and managed. This applies to SIL, locally significant industrial sites, and non-designated industrial sites, and Map 4.1 identifies Greenwich for managed release. London Plan Policy 2.17 states that SIL should be promoted, managed and protected as London's main reservoir of industrial and related capacity, and that proposals in SIL should be refused unless they fall within the broad industrial type activities appropriate to the function of the particular SIL in question. This SIL is identified in Table A3.1 as a Preferred Industrial Location, with suitable uses including employment workspace to meet identified needs for SMEs or new emerging industrial sectors, and small scale 'walk to' services for industrial occupiers such as workplace creches or cafes. Policy 2.17 also identifies that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities.

18 Policy E4 of the draft London Plan also seeks to ensure a sufficient supply of land and premises to meet current and future demands for industrial and related functions to be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution as set out in Policy E7 (see below). This applies to SIL, locally significant industrial sites, and non-designated industrial sites, and Greenwich is identified to 'retain' its existing industrial capacity in Table 6.2. The Draft London Plan Examination in Public Panel Report recommends that before finalising the Plan for publication, the Mayor should give further consideration to, and modify if justified, the categorisations of boroughs in Table 6.2 in order to provide a more positive strategic framework for the provision of industrial capacity.

19 Policy E5 of the draft London Plan states that SIL should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. It supports industrial-type activities in SIL and states that development proposals for other uses (including residential, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. Furthermore, development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.

20 Policy E7 'Industrial intensification, co-location, and substitution' of the draft London Plan states that mixed use developments on non-designated industrial sites (such as the 'Riverside Land' non-SIL part of the proposal site) should only be supported where there is no reasonable prospect of the site being used for industrial purposes; or it has been allocated in an adopted development plan document for residential or mixed use development; or industrial, storage or distribution floorspace is provided as part of mixed use intensification. Again, this is subject to the industrial and related activities on-site and in surrounding areas not being compromised by the residential use. Furthermore, the intensified industrial, storage and

distribution uses should be completed and operational in advance of any residential component being occupied; and should include appropriate design mitigation to minimise conflict with residential uses.

21 The Draft London Plan Examination in Public Panel Report recommends minor textual changes to Policies E4 and E7.

22 Greenwich Council's Core Strategy (2014) identifies the whole of the site as part of the Greenwich Peninsula West Strategic Development Location, as a new high quality urban quarter comprising a cruise liner terminal and associated leisure, hotel and enterprise space in addition to new housing. The Core Strategy retained the SIL designation of the 'Tunnel Avenue Frontage Land and the Southern Warehouse', but released the remainder of the site from SIL designation for residential-led use, in line with the Greenwich Peninsula West Masterplan. It is also noted that the Core Strategy provides general protection to sites in existing or previous employment use; however, it explicitly notes that this does not apply to sites within the Greenwich Peninsula West Strategic Development Location.

23 Based on figures provided at early pre-application stage, the existing SIL within the site extends to 2.08 hectares and contains 6,326 sq.m. of floorspace, including 4,626 sq.m. of creative industry use, mostly made up of Use Class B1/B8, with an element of B1(a) office space. Further to Policy E4 of the draft London Plan, paragraph 6.4.5 states that as a general principle, there should be no overall net loss of industrial floorspace capacity across London in designated SIL, where floorspace capacity is defined as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio (whichever is the greater). On this basis, a 65% plot ratio indicates that 13,000 sq.m. of industrial-type floorspace is required to be re-provided within the SIL part of the site. The applicant proposes to provide 13,972 sq.m. of Use Class B1(c), B2, and B8 floorspace, plus yard and servicing space, within the Southern Warehouse and the new industrial building (W01). This meets the 65% plot ratio requirement based on the figures provided, which should be confirmed in the application materials, and would be supported in line with Policies E4 and E5.

24 A small element of Use Class A3/A4 floorspace (1,050 sq.m.) is proposed within the Southern Warehouse fronting onto the river and the riverside walkway. Although this is contrary to London Plan and draft London Plan SIL policy, considering the small area of floorspace (1,050 sq.m.) and the benefits arising from the improved relationship to the riverside walkway public realm, it is supported in this case.

25 The remaining 3.26 hectares of the site (non-SIL) is currently comprised primarily of open storage and parking associated with Use Class B8, with only 76 sq.m. of building floorspace. No industrial uses are required in the non-SIL parts of the site by the London Plan or draft London Plan Policies E4, E5, and E7, on the basis that it has been allocated for mixed use in the development plan, and industrial-type floorspace is re-provided on the SIL part of the site. However, Policy E7 requires that the intensified industrial uses provided on the SIL part of the site should be completed and operational in advance of any residential component being occupied on the wider site. The phasing plan provided indicates that the industrial uses will not be completed and operational before residential occupation, which must be addressed in any application

26 In line with draft London Plan Policies E4 and E7, the application must demonstrate that the industrial uses on-site and in surrounding areas are not compromised by the proposed adjacent residential uses, and design mitigation must be incorporated. An office/industrial building (B01) containing 2,220 sq.m. of Use Class B1/B2 space and 1,059 sq.m. of Use Class

A1/A2/A3/B1/B2/D1 space is proposed adjacent to the proposed industrial building within the SIL, which is supported in providing a buffer between residential and industrial uses, allowing the SIL to function effectively in accommodating industrial-type activities and the ability to operate on a 24-hour basis, and to protect residential amenity. Mitigation is also identified for the proposed residential buildings adjacent to the existing SIL outside of the application site, as discussed further below.

27 The applicant should also note Policy HC5 'Supporting London's culture and creative industries' and Policy E2 'Providing suitable business space' of the draft London Plan, which provide support for creative industries. The retention and/or re-provision of existing creative industries on the site should be sought wherever possible, although it is recognised that these occupants are on temporary leases. Policy E2 also states that proposals involving more than 2,500 sq.m. of business floorspace should consider the scope to provide a proportion of flexible workspace or smaller workspace suitable for micro, small and medium-sized enterprises. Policy E3 'Affordable workspace' also identifies that affordable workspace should be considered in defined circumstances, although it is understood that the Council has no specific requirements.

#### Public art and visitor infrastructure

28 The proposal to include the Gloriana and associated visitor centre, and public art, on the jetty is strongly supported in line with draft London Plan Policies D7, E10, HC1, HC5, SI16 and SI17.

#### Form of application

29 The applicant proposes only a minimal part of the site to be within the detailed application, and the central part of the Southern Warehouse is now proposed to be removed from the application completely. As stated throughout the pre-application process, the applicant is encouraged to include further elements within the detailed application, and justification for the outline approach should be included in the application. The outline application will be required to be accompanied by a rigorous design code and parameter plans. Parameter plans are included within the draft design code provided, which indicate that they would be appropriate, however, an assessment of the full scale drawings will be required to confirm this.

## **Housing**

#### Affordable housing

30 London Plan Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Policy H5 'Delivering affordable housing' of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 'Threshold approach to applications' identifies a minimum threshold of 35% (by habitable room) affordable housing, or 50% on former industrial sites, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, as well as investigating grant funding, can follow the 'fast track route' set out in the SPG. This means that they are not required to submit a viability assessment or be subject to a late stage viability review. Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being

the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA.

31 The application proposes 35.3% (by habitable room) affordable housing, made up of 69% low cost rent and 31% intermediate.

32 According to draft London Plan Policy H6, the applicable threshold to follow for the fast track route would be 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and other Non-Designated Industrial Sites appropriate for residential uses (in accordance with Policy E7 'Industrial intensification, co-location and substitution') where the scheme would result in a net loss of industrial capacity. Applying a 65% plot ratio (as identified above) for the entire site, the proposal would be required to re-provide approximately 35,000 sq.m. of industrial-type floorspace, in order for the 35% threshold to apply and enable the application to follow the fast track route.

33 The proposal includes between 13,972 sq.m. and 17,251 sq.m. (based on the figures under 'details of proposal' above) of industrial-type floorspace and the proposal does not therefore qualify for the fast track route, and a financial viability assessment and late stage review, would be required. The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of any permission being granted, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. Considering the phasing of the proposals, mid-term reviews may also be required as per the SPG, triggered prior to the implementation of phases. These would take a similar approach to the early review, taking account of any additional affordable housing provided through earlier reviews.

34 Any financial viability assessment will be robustly assessed, working in partnership with the applicant, the Council and its independent assessors to ensure that the maximum contribution is secured in accordance with Policies 3.11 and 3.12 of the London Plan, the Mayor's Affordable Housing and Viability SPG, and Policies H5 and H6 of the draft London Plan. The applicant must also fully investigate options for grant funding in order to maximise the delivery of affordable housing.

35 In due course, the Council must publish any submitted financial viability assessment, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information in accordance with the SPG.

36 The tenure of the low cost rent and intermediate housing should be confirmed in the application materials. The rent levels for social rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Affordability thresholds for all tenures must be secured in the section 106 agreement attached to any permission.

#### Fire safety

37 In the interests of fire safety and to ensure the safety of all building users, Policy D11 of the draft London Plan seeks to ensure that development proposals achieve the highest standards of fire safety. The application must include a statement that demonstrates that all features and materials would comply with Part B of the Building Regulations.

## Play space

38 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the draft London Plan states residential developments should incorporate good-quality, accessible play provision for all ages, with at least 10 sq.m. of play space per child that:

- a) provides a stimulating environment;
- b) can be accessed safely from the street by children and young people independently;
- c) forms an integral part of the surrounding neighbourhood;
- d) incorporates trees and/or other forms of greenery;
- e) is overlooked to enable passive surveillance; and
- f) is not segregated by tenure.

39 Play space provision should be assessed using the updated GLA play space calculator (2019), available at: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/play-and-informal-recreation>. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by section 106 agreement.

## **Urban design**

40 The general layout is supported; however, the interface between blocks B02/03 and the Wharf Drive servicing area remains unclear. Further clarity is required on how Agent of Change principles/mitigation will be secured to ensure high residential quality.

41 GLA officers previously expressed concerns about the ability of the north-south servicing/ pedestrian/cycle route to accommodate the 'canal' water feature, and its removal is therefore supported. The introduction of clearly defined private residential communal gardens is also welcomed; however, this is unclear in the design code, which is described as 'semi-private'. The riverside park is strongly supported, and has the potential to meet a high standard subject.

42 Further detail is needed on how the blocks interface with the public realm, including defensible space. The design code indicates this is secured through parameter plan A\_011; however, this does not appear to be the case. The design code should also address the sizing of residential lobbies.

43 Removing the central portion of the Southern Warehouse from the application raises concern given this will result in a large amount of dead frontage onto Seawitch Lane. The approach to the segregation of vehicles, pedestrians and cyclists appears on Seawitch Lane appears to be more convincing than at earlier stages. The proposed colonnade within the industrial building should be generously sized in terms of height and width, which should be secured within the design code.

44 The tapering of Building T03 to reflect the form of industrial silos is supported as a concept; however, no detail is included to ensure exemplary design quality is secured. The design code should explain design parameters for achieving an elegant, tapered form to the tower's base.



45 Pedestrian and cycle links to the neighbouring Enderby Wharf site need more clarity to demonstrate how the significant level changes can be addressed to create fully accessible and legible connections to Telegraph Avenue/Christchurch Way and beyond.

46 In terms of density and height, the scheme will require rigorous justification in the application materials, taking account of the relatively poor connectivity of the site to its surroundings and to public transport.

47 The design code sets out clear and simple principles for facade treatments and materials which is welcomed. The greening of tower facades is welcomed as a concept; however, it may not be practical given climatic conditions and exposure to the river, and may introduce maintenance costs and challenges. Should this be pursued, the design code will need to provide sufficient detail to secure a workable solution with detail provided on long term maintenance.

#### World Heritage Site, strategic views and historic environment

48 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*, and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*. Policy HC1 'Heritage conservation and growth' of the draft London Plan, and London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm.

49 London Plan Policy 7.10 'World Heritage Sites' and draft London Plan Policy HC2 state that development should conserve, promote and enhance their Outstanding Universal Value. Further guidance is provided in the Mayor's supplementary planning guidance 'London World Heritage Sites - Guidance on Settings', and the Maritime Greenwich World Heritage Site Management Plan. The Maritime Greenwich World Heritage Site (WHS) lies approximately one kilometre to the south-west and the proposals will be highly visible from the WHS across the open expanse of the Thames. As a place of Outstanding Universal Value, the WHS is a designation of the highest order, and as such it is an important planning consideration that should be assessed as the proposals develop.

50 Policy HC4 'London View Management Framework' of the draft London Plan, and London Plan Policy 7.12, states that development should not harm strategic views, with further detail provided in the Mayor's supplementary planning guidance 'London View Management Framework' (LVMF SPG). The proposals will appear peripherally in some LVMF views, which should be considered in the application materials.

51 The applicant presented an analysis of three views, all within the World Heritage Site (Riverside adjacent to the Royal Naval College; from the General Wolfe Statue; and to the south of the Queen's House within Greenwich Park) showing wirelines for the proposals, including in the cumulative situation with all consented schemes. The proposed buildings will clearly be prominent in these views, in particular the two tallest buildings, although less so in the cumulative views. The application materials will need to include rigorous justification for the heights of the buildings in townscape terms. A full assessment of heritage assets and strategic views, and the impact of the proposals upon them, will be required within a Townscape, Heritage and Visual Impact Assessment (THVIA), or similar, including verified views, some fully rendered as agreed with the Council.

## Transport

52 The applicant has been in separate pre-application discussions with TfL. Subject to the outcome of these discussions, proposals for a consolidation centre, mobility hub, and Thames Clipper jetty are likely to be supported in strategic planning terms. The proposed mobility hub suggests that car parking should be further reduced.

## Climate change

53 The energy strategy was not discussed at the meeting; however, GLA energy assessment planning guidance is available on the GLA website, which provides information on targets taking into account Part L 2013 of the Building Regulations:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>. The applicant is advised to provide a draft energy strategy to GLA officers for review and comment at any point prior to submission.

54 As a site adjacent to the Thames, the application of London Plan Policy 5.12 and draft London Plan Policy SI12 'Flood Risk Management' is an important consideration. The application of sustainable drainage strategies in line with London Plan Policy 5.13 and draft London Plan Policy SI.13 will also be important.

55 The application will be required to include an Urban Greening Factor (UGF) assessment, in line with London Plan Policy 5.10 and Policy G5 of the draft London Plan.

## Conclusion

56 The principle of the proposal is supported; however, issues relating to social infrastructure, safeguarded wharves; industrial use; housing; affordable housing; play space; fire safety; urban design; World Heritage Site, strategic views and historic environment; transport; and climate change should be fully addressed in any application. Should these points be addressed, GLA officers consider that further strategic planning pre-application meetings prior to submission would not be required.

---

for further information, contact GLA Planning Unit (Development Management Team):

**Juliemma McLoughlin, Chief Planner**

██████████ @london.gov.uk

**John Finlayson, Head of Development Management**

██████████ @london.gov.uk

██████████ **Deputy Head of Development Management**

██████████ @london.gov.uk

██████████, **Principal Planner**

██████████ @london.gov.uk

██████████, **Principal Strategic Planner, Case Officer**

██████████ @london.gov.uk

---