Greenwich Peninsula (Plot N0602)
in the London Borough of Greenwich
planning application no. 08/1013/F

Strategic planning application stage 1 referral (new powers)

The proposal
Mixed use development comprising five elements of a maximum height of 122 metres, accommodating 397 residential units and 821 sq.m. retail floorspace (use class A1/A2/A3) with associated basement car parking and servicing, access, private and communal amenity space and landscaping.

The applicant
The applicant is Peninsula Quays Limited, and the architect is Patel Taylor LLP

Strategic issues
The proposal is a high density residential-led scheme by the River Thames that is linked to a wider consented planning application for the redevelopment of Greenwich Peninsula. The key strategic issues are the acceptability of the housing elements of the scheme, particularly affordable housing provision; the impact of the design on the strategic view from Greenwich Park and the relationship of the scheme to the riverfront and the main street; the measures incorporated to tackle climate change, and the potential conflict between the site and the safeguarded wharf at Victoria Deep Water Terminal. Transport issues are also addressed in the report.

Recommendation That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 97 of this report; but that the possible remedies set out in paragraph 99 of this report could address these deficiencies.

Context

1 On 19 May 2008 the Mayor of London received documents from Greenwich Council notifying him of a planning application, received by the Council on 28 April 2008, of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 20 June 2008 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

The application is referable under Categories 1A and 1C of the Schedule to the Order:
“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats,” and,

“Development which comprises or includes the erection of a building of one or more of the following descriptions:

(a) the building is more than 25 metres high and is adjacent to the River Thames.”

2 Once Greenwich Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

3 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

4 Plot N0602 is the first plot to be brought forward as part of the outline planning permission for the north-western quadrant of the Peninsula. It lies west of the O2 Arena adjacent to the River Thames and proposed Meridian Gardens. The site area is 0.606 hectares.

5 London Plan policy 1.3 “Major Areas and Co-ordination Corridors” identifies the Greenwich Peninsula as part of the Thames Gateway Growth Area corridor. It is also identified as an Opportunity Area in London Plan policy 2A.5 “Opportunity Areas”, meaning that developments should promote social and economic inclusion relating to neighbouring areas.

Details of the proposal

6 The planning application is for a total of 396 residential units, with 119 affordable units, and 788 sq.m. of retail (Use Class A1/A2/A3).

7 The above uses are contained within 5 elements of the scheme set out as follows:

- 5 storey block (Pavillion/Pier Block)
- 6 storey block (Meridian block)
- 18 storey block (Wrap block)
- 13 storey block (Strand block)
- 32 storey tower (South tower)

8 The proposal is for 397 residential units, 78 of which are for social rent and 41 for intermediate sales. This represents a 66:44 split between social rent and intermediate units.

9 The scheme incorporates 821 sq.m. of retail use on the southern frontage and a total of 186 car parking spaces. The main vehicle access is off the Meridian Strand with pedestrian access to the cores from five separate points around the development.

Case history
On 23 February 2004 outline planning permission (ref 02/2903/O) was granted for the comprehensive redevelopment of the peninsula (the outline permission), and for the permanent retention and change of use of the Millennium Dome (now ‘the 02 Arena’) to provide an arena and the Millennium Dome Waterfront leisure and entertainment area, as well as for the development of Millennium Square.

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

12. The relevant issues and corresponding policies are as follows:

- **Tall buildings/views**
  - London Plan; View Management Framework SPG
- **Urban design**
  - London Plan; PPS1
- **Access**
  - London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- **Housing**
  - London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG
- **Affordable housing**
  - London Plan; PPS3; Housing SPG
- **Density**
  - London Plan; PPS3; Housing SPG
- **Transport**
  - London Plan; the Mayor’s Transport Strategy; PPG13Parking
  - London Plan; the Mayor’s Transport Strategy; PPG13
- **Ambient noise**
  - London Plan; the Mayor’s Ambient Noise Strategy; PPG24
- **Safeguarded wharves**
  - London Plan; Safeguarded Wharves on the River Thames Implementation Report
- **Sustainable development**
  - London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG
- **River Thames/flooding**
  - London Plan; Mayor’s draft Water Strategy; PPS25, RPG3B
- **Air quality**
  - London Plan; the Mayor’s Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG, PPS23

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

**Design**

14. The London Plan policies set out design principles for a compact city. They seek to promote world class architecture and design (Policies 4B.1 and 4B.2) and to enhance the quality of the public realm. The Plan also covers specific design issues, including tall and large scale buildings, and impacts on built heritage and strategic views.

**Form/massing**

15. The outline planning permission fixed design parameters for the various development plots on the Peninsula, including spot heights and development envelope. Figure 1 below, taken from the applicant’s Design and Access statement gives an indication of the consented parameter envelope.

**Figure 1 – The consented parameter envelope for plot N0602 and surrounding plots**
In bringing forward the detailed design, three approaches to distribution of the massing were explored in detail as set out in figure 2 below:

**Figure 2 – Massing studies**

The final option in figure two above is the massing option brought forward within the application. The removal of the southern block reduces the number of north-west facing residential units (assuming a single-aspect design), increasing daylight and sunlight to the northern block with the additional potential benefit of improved views for future development on the plot to the south. The massing also opens up the potential for the design to articulate the different blocks as discussed in the design quality section below.

The massing has been developed into five elements set out in paragraph 8 of this report. On the basis of the agreed parameters in the outline planning application, the proposed Meridian
Tower is the element that needs particular consideration against London Plan policies on views impact and design quality.

19 The proposed tower exceeds the consented parameter of 81 metres (AOD) by approximately 38 metres, with an additional 3 metres from the cleaning crane. Planning permission is sought for a maximum height of 122 metres.

Views/ height

20 The London Plan designates a series of views as part of the London View Management Framework (LVMF) published in July 2007 (policy 4A.16 and table 4B.1). Policy 4B.18 of the London Plan establishes the approach to assessing development proposals that fall within the assessment areas of designated views.

21 The proposed development falls within the London Panorama from Greenwich Park. A Townscape and Visual Assessment was carried out as part of the Environmental Statement for the outline planning permission. The applicant has reviewed this assessment and revised visual assessment work has been submitted as part of this application.

22 The relevant viewing place for this panorama is the General Wolfe statue by the Royal Observatory, from which there are two assessment points. The first of these is the formal view of the Greenwich World Heritage Site (Assessment Point 5A.1) and the second is to the Strategically Important Landmark St. Paul’s Cathedral (Assessment Point 5A.2). It is this first view that is relevant to this application and is shown below:

**Figure 3: Designated view 5 - London Panorama from Greenwich Park**

![Significant View from Assessment Point 5A.1](image)

23 The Strategically Important Landmark of St. Paul’s Cathedral is not within the view from this Assessment Point. Other landmarks within this view are the buildings of Greenwich Maritime in the centre, the Millennium Dome / O2 Arena to the east, the Monument and Tower Bridge to the west.

24 The following figure shows the proposed impact of the development on the panorama, in the context of the build out of the approved parameter plans for the outline planning application. This figure is taken from the applicant’s Townscape and Visual Assessment:
25 The development site lies towards the right-hand side of the above view. The proposed Meridian tower element of the scheme can be seen behind the four chimney stacks of Greenwich Power station, which lies in the middle ground.

26 The LVMF requires the submission of a Qualitative Visual Assessment (QVA) for development within the above panoramic view. QVA’s are particularly important where the proposal is not supported by an Environmental Impact Assessment, for which there is a long established methodology. In this instance, the original Townscape and Visual Assessment was undertaken as part of an EIA. The revised assessment provides a qualitative assessment alongside the figure presented above but does not explicitly present a full QVA. The descriptive information is brief but does identify the key features and conditions of the view, noting the focus of the view as the relationship between the World Heritage Site and the cluster of towers on the Isle of Dogs. It covers the relationship between the proposed Meridian Tower and the Greenwich Power Station chimneys and the Dome, followed by an assessment of the effects of the proposed development on the view. In this instant, sufficient information has been provided to enable an assessment of the impact of the proposal on the strategic view.

27 The applicant concludes that the significance of potential impact is negligible. The applicant argues that the tower helps draw the viewer across from the principle view and over to the Dome.

28 The proposal preserves the view and setting of St. Paul’s Cathedral and the setting of the listed buildings within the World Heritage Site. The massing of the Meridian Tower creates a form that complements the form of the power station chimneys, whilst at the same time enabling the viewer to distinguish between the structures and their locations.

29 The Townscape and Visual Assessment also assesses the potential impact on five views within the original EIA (see Appendix 1). It concludes that the significance of potential impact of following four views would be beneficial, having a moderate impact locally, with the remaining view from the Royal Naval College by the riverside having a negligible impact:

- View 2b: from the North at East India Dock Basin
- View 3: from the raised approach road to Canary Wharf overlooking Blackwall Basin
- View 4a: from the Manchester Road Lift Bridge
• View 4b: from the Beach at Van Gogh Crescent

30 In respect of the London Panorama from Greenwich Park the proposed development preserves the ability to recognise landmark buildings within the view and does not intrude into the front or middle ground assessment areas. In terms of impact on other views, the impacts will be local and not harmful, and these raise no strategic concerns.

Design quality

31 Each of the five distinct elements has its own design rationale and set of materials, however, the evolution of the design ensures that they do not appear as a disparate group of buildings. The buildings will each have strong identities and the variation in heights and depths will make for an interesting scheme.

32 The quality of all the buildings is important, and particularly the Meridian Tower given its prominence. The scheme incorporates dual aspect units within The Wrap, The Strand and The Tower buildings. Within The Wrap building there are 38 north facing single aspect units, concentrated at the lower levels. At the higher levels, the building steps back with larger units incorporated. The north-south orientation of the blocks, and the reconfiguration of the massing leading to the Meridian Tower proposal rather than a perimeter block has helped to minimise the number of north facing single aspect units. The remaining units will retain a view of the river and Meridian gardens, even if only at an angle. Overall, the design has minimised the number of single aspect units.

33 The design is of a high quality, that views from the residential units of the river are striking and that views of the building itself are interesting (see figure 5 below).

Figure 5 – The Meridian tower in the context of the overall scheme
Relationship with river/open space/adjacent buildings

34 The site is adjacent to land identified in the masterplan for public space along the river front. The remaining three boundaries are further development plots in the Masterplan. The two prominent boundaries are the western boundary with the river and the eastern boundary along what will be known as The Strand.

35 Along the river front there are proposals for public space, dealt with by a separate planning consent. This includes a linear pedestrian route along the river and linear ecological features. Along the route different uses and activities are envisaged, including public gathering areas and a street market.

36 The relationship between the ground floor uses and this space is important. The four storey Pavilion building is significant in terms of its proposed retail/restaurant/café use and in linking the strong vertical emphasis in the Meridian tower, with the horizontal nature of the public space. The design concept works well, and should integrate the development with the riverside walk and public gardens.

37 The landscape treatment of east-west connections between park and transport hub along the sides of the building demonstrates high quality of materials but the design proposals lack conviction and coherence with regard to achieving strong and distinctive designs for each route.

38 On the eastern boundary, the main building along The Strand will sit along the majority of the boundary (84 metres in length), rising to 13 storeys. The success of this building in creating a positive relationship with The Strand and any future development depends on the quality of the materials, the treatment of the ground floor and the articulation of the building to ensure that it does not appear overbearing. The proposed Strand building is broken up to read as three distinct elements as shown in figure 6 below. The use of vertical piers and horizontal cornices create a structure within which a variety of detail can be provided, such as changing the width and colour of the piers. This is a positive solution, however, Greenwich Council will need to ensure that high quality is maintained throughout the detailed design process.

Figure 6 – The Strand building

Amenity and children’s play space
39 Each dwelling will have its own amenity space linked to a habitable room, which will either be a balcony, terrace or garden. A 953 sq.m. communal courtyard will also be provided in addition to 112 sq.m. Local Area for Play.

40 The London Plan has a specific policy (3D.13) and supplementary planning guidance on children and young people’s play and informal recreation space, to ensure that recreation provision is in line with the expected child population generated by the scheme. The proposed play space will be located in the courtyard garden area on level 3 of the development as shown in figure 7 below:

Figure 7 - proposed location of children’s play space

41 The number of children likely to live within the scheme is 144\textsuperscript{1}, meaning the need for approximately 1422 sq.m of recreation space. The SPG recognises the need for provision for different age groups and that the distance from the site of this provision varies by age. For this development, the approximate required provision by age is as follows:

- Age 0-4: 555 sq.m.
- Age 5-10: 526 sq.m.
- Age 11-15: 341 sq.m.

42 The scheme falls substantially short of this level of provision in overall terms and even for need for the youngest age group where on-site location is essential. Adjacent to the site, along the

\textsuperscript{1} Calculated in line with methodology and assumptions in Appendix B of the London Plan Supplementary Planning Guidance: Providing for Children and Young People’s Play and Informal Recreation.
river front are the Meridian Gardens, for which there is planning consent however there does not appear to be children’s play provision within this area.

43 The applicant relies solely on the outline planning permission to justify the level of play space provision within this scheme, however, London Plan policy and guidance on this issue has materially changed since the outline planning application, and the scheme represents a full planning application in its own right. The applicant has sought to address other material policy changes, notable those relating to climate change as part of this application.

44 The applicant has not adequately addressed London Plan policy with regard to children’s play space. The applicant will need to revise the scheme and demonstrate further the relationship between the scheme and wider open space provision. It should work with the Council to enhance provision in relation to the development if alterations to the masterplan strategy are required. In addition the Council is requested to condition the detailed landscape design and to add “in consultation with the GLA,” as part of it.

Access and inclusive design

45 The applicant has submitted an Access Statement, along with plans for each of the proposed wheelchair accessible units, which are spread throughout the development. The statement looks reasonable in principle, and inclusive design appears to be integral to the scheme design, however, this is subject to a more detailed consideration of the statement.

Sustainable design and construction

46 The London Plan requires development to adopt sustainable design and construction principles, as set out in policy 4A.3 and expanded on in the SPG on Sustainable Design and Construction. Applicants are required to submit a Sustainability Statement to demonstrate how the scheme compares with the Mayor’s essential standards and preferred standards.

47 The applicant has submitted a statement covering all of the standards in the SPG, along with an energy statement and a Code for Sustainable Homes pre-assessment report. Key measures to address energy, water and living roofs are covered in the Climate Change section below, however, there are additional commitments in respect of sourcing of materials, the use of FSC certified timber and charging points for electric cars.

48 The scheme incorporates green roofs on all five main buildings and a range of habitat types are intended. Greenwich Council should ensure their implementation through a suitable planning condition.

49 The scheme is currently achieving Code for Sustainable Homes level three, however, the pre-assessment report indicates that it may be possible to achieve level four. The applicant has stated its intention to achieve level four. There are no specific London Plan policies in relation the Code, which assesses individual buildings on a technical basis. The intention to strive for a higher code level is positive, however the acceptability of the scheme in London Plan terms is determined by assessment against policy.

Overall
Overall the design rationale is consistent in strategic planning terms with policies 4B.1 on design principles for a compact city and 4B.2 to promote world-class architecture and design. The applicant has also demonstrated that the scheme will adopt good sustainable design and construction measures in line with policies 4A.1, 4A.3 and 4A.11. However, the scheme is not consistent with policy 3D.13 of the London Plan and the scheme should be revised to incorporate more play space and commitments to provide suitable provision in line with the expected child population possibly within the Meridian Gardens scheme, need to be made.

**Housing**

The outline planning permission sets the parameters for overall housing provision, affordable housing, housing mix and tenure. Conditions were imposed requiring Meridian Delta Limited to submit for approval by Greenwich Council a phasing plan, and details of density and mix across the development. These conditions have now been discharged.

The London Plan has a strategic target for housing provision of 30,500 additional homes per year. The Annual Monitoring Target for Greenwich is 2,010 homes as set out in policy and table 3A.1. The London Plan seeks to maximise the potential sites in the relation to London Plan design principles, public transport capacity and the local context of the site (Policy 3A.3). The Plan contains a series of policies to help deliver mixed and balanced communities, and seeks to secure the maximum reasonable amount of affordable housing on-site, taking account of scheme-specific circumstances.

The consented scheme required the submission of a phasing plan for approval by Greenwich Council. This plan allowed for a total of 2,500 residential units within phase 1, and includes Plot N0602. This scheme will provide 397 units. Reserved matters applications have been submitted and approved for the following:

- Plot M0102 (Bellway Homes, 229 residential units)
- Plot M0114 (Meridian Delta Ltd and Mode Homes, 207 units)
- Plot N0206 (Meridian Delta Ltd and Crest Nicholson Plc, 305 units)

The consented scheme was subject to a condition requiring density ranges to be in substantial accordance with application documents and to be included in the Masterplan Design Code. This document has been approved by Greenwich Council and sets a density for the wider area, known as Meridian Gardens, of 350 dwellings per hectare.

The London Plan density matrix (Table 3A.1) sets a guide for determining appropriate densities, based upon the characteristics of the area and the public transport accessibility level (PTAL). In this instance the site has a good PTAL of 4 and the setting is arguably “central”, meaning that a density of between 650 and 1100 habitable rooms per hectare is likely to be suitable.

The applicant states the density is 943 habitable rooms per hectare / 321 dwellings per hectare. Design and transport issues are considered further on in the report and although the proposed density falls within the quantitative guidelines in the London Plan, outstanding issues for these will have to be addressed for the density to be acceptable, including children’s play space provision.

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2 The London Plan defines “central” as “areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of a International, Metropolitan or Major town centre.”
Affordable housing

57 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

58 Clause 51 of the section 106 agreement for the outline planning permission requires the delivery of 38% of housing provision as affordable housing across the development, allowing for flexibility on individual sites if consistent with an agreed methodology including broad location, a mix within each plot, parameters for minimum and maximum provision.

59 This application represents a 30% affordable housing provision by unit. In February 2007, the applicant submitted to Greenwich Council a programme for the provision of affordable housing, within which the applicant demonstrates how provision of 30% of units as affordable housing within this plot relates to the overall provision of 38% within this particular district of the Peninsula.

60 Policy 3A.10 of the London Plan is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The ‘Three Dragons’ development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. In this instance, however, the affordable housing provision across the development is intertwined with a range of other costs and contributions to facilities, priorities for which were established at the outline planning stage. In addition, based on the information provided to the GLA and Greenwich Council the provision should not undermine the overall delivery of the affordable housing within the consented scheme.

Housing mix and tenure

61 The proposed tenure split within the affordable housing provision is 66% social rented and 44% intermediate. The consented scheme set parameters for housing mix by size across the development. Appendix B shows the proposed mix of units by number of bedrooms and by tenure for the scheme in comparison to the outline planning consent.

62 Although there are variations, the parameters act as a guide. The social rent provision provides a reasonable mix of units size that is broadly consistent with the parameters in the outline consent and the mix does not raise any strategic concerns.

Lifetime homes/wheelchair accessible

63 The London Plan requires all housing to be built to Lifetime Homes standard and for 10% to be wheelchair accessible or easily adaptable for residents who are wheelchair users. As part of the consented scheme, Greenwich Council required 10% of the social rented units to be designed to be capable of adaptation to Greenwich Council Housing Services Wheelchair Unit Site Brief.
The applicant states that all units have been designed in accordance with lifetime homes standards and 10% of dwellings to be adaptable to wheelchair standards. It further states that 64 units (16%) are designed to be easily convertible to fully accessible standards.

The proposal is broadly consistent with the London Plan housing policies, taking into account the consented masterplan and subsequent documents submitted to Greenwich Council in order to discharge planning conditions.

Noise

The London Plan seeks to reduce noise and enhance soundscapes. Policy 4A.20 sets out the measures the Mayor will take and which boroughs should incorporate within their Development Plan Documents. This includes separating new noise sensitive developments from major noise sources wherever practicable. Policy 4C.9 is also of some relevance to this application, stating that development next to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance. This site is not next to or opposite the safeguarded Victoria Deep Water Terminal, however, conditions were imposed by Greenwich Council on the outline planning application to address the potential noise issues between this and adjacent plots and the Safeguarded Wharf.

Greenwich Council has raised concerns regarding this proposal, notably that it is being brought forward in advance of sites that could act as a noise barrier between sensitive receptors and the wharf uses. A supplementary noise report has been submitted to the Council and copied to the GLA. There are potential noise concerns with the current proposal that might affect the likelihood of complaints, and the applicant should look to address these in discussion with Greenwich Council.

One potential concern is that some of the additional residential rooms, especially bedrooms, will have line of sight to the nearby safeguarded aggregates wharf at Victoria Deep Water Terminal, where unloading of vessels takes place at any time of day or night. Residents who take issue with the noise from the wharf are able to request that Greenwich Environmental Health Officers investigate and if they consider that the noise constituted a statutory nuisance, they would be obliged to serve an abatement notice on the wharf, which could lead to restrictions on its freedom to operate. Alternatively, residents themselves have the right to take their own legal action.

The applicant’s response is to provide enhanced cladding (in particular, acoustic glazing) for affected properties to reduce internal noise levels to those accepted by Greenwich as discharging Condition 120 of the original consent for Greenwich Peninsula given on 23 February 2004. However, this protection is only effective if residents are willing to keep their windows closed and while the proposal now is to provide ‘comfort cooling’ to the affected bedrooms, residents cannot be forced to keep their windows closed and use this ventilation system instead. In addition, although it is stated that measurements of wharf noise were undertaken during both night time and day time, the applicant’s report does not clearly indicate which are the night time noise levels nor does it provide an assessment according to BS4142 (the standard methodology for assessing noise from industrial premises), which would enable the likelihood of complaints to be ascertained.

A second, related concern is that the development on this plot will go ahead before blocks between Plot N0602 and the wharf are built. These other blocks would provide some significant noise screening to many of the dwellings on Plot N0602. This development phasing would therefore leave residents more exposed to noise from the wharf for a significant period.
71 In view of the above, it is suggested that before Greenwich reaches a decision on the noise aspects of this proposal, it may wish to consider requesting more information on the potential night noise impacts in the form of a BS4142 assessment and taking into account the effects of the proposed phasing of other parts of the development.

72 The proposal raises concerns in relation to policy 4A.20 arising from the practicalities of delivering the masterplan. The proposal is not strictly contrary to policy 4C.9 of the London Plan but raises concerns in relation to the spirit of the policy. Care needs to be taken to ensure that the principles that were acceptable for the outline planning application are not undermined in this full planning application and the applicant should provide the further information suggested in this report to the Council and if necessary revise proposals accordingly.

**Sustainability**

74 The London Plan (policy 4A.1) requires development to make the fullest contribution to the mitigation and adaptation of climate change, and in particular to minimise its carbon dioxide (CO2) emissions. The energy demand and supply aspects of all development should be determined in line with the energy hierarchy to use less energy, supply energy efficiently and to use renewable energy. Specific policies 4A.3 – 4A.11 apply to each aspect of the energy hierarchy, and to climate change adaptation. Policies 4A.12 – 4A.18 address water issues including flood risk management, the use of sustainable drainage systems and reducing the use of water.

**Energy**

75 The applicant has submitted an energy demand assessment and strategy, which states that the scheme will reduce carbon dioxide emissions by just under 30% beyond minimum building regulations requirements (taking account of energy loads not covered by building regulations).

**Energy efficiency**

76 Energy efficient design is calculated, through modelling work, to reduce CO2 emissions by 6.4%, however details from the modelling work have not been provided and the applicant should provide information particularly on proposed insulation levels and air tightness as there may be scope for the applicant to improve on the savings from energy efficient design. Passive design measures are covered earlier in this report in the section on design.

**Decentralised energy**

77 Policy 4A.6 of the London Plan requires developments to demonstrate that they have selected their power, heating and cooling technologies in line with preferences aimed at prioritising decentralised energy solutions.

78 At present there is no district energy system in the area, however, Meridian Delta Limited are actively considering the potential for a Peninsula-wide Combined Heat and Power (CHP) system. The applicant has stated that the scheme is designed to connect should such a system be brought forward, and demonstrated this through a schematic drawing.

79 In the absence of a district CHP system, the scheme will contain one energy centre to host energy supply technologies, with a communal heating system to serve all uses. An on-site gas-fired CHP system will supply all the hot water throughout the year as well as some space heating from mid-September to May. The London Plan requires CHP systems to be sized to minimise CO2 emissions. At an output of 210kWelectrical /345kW thermal to proposed CHP system is in line with London Plan requirements, and it will reduce CO2 emissions by a further 18.4%.
Renewable energy

80 The applicant has considered a range of renewable energy technologies and considers the use of biomass as most appropriate for the development. It states a carbon dioxide emissions reduction of 7.7% in addition to savings achieved from energy efficient design and CHP. The biomass will meet additional space heating needs in the winter months.

81 The Council should impose a planning condition to address the potential to connect to a district CHP system, and to ensure the implementation of the energy efficiency and renewable energy measures.

Water

82 The applicant is committed to achieving the water use target in policy 4A.16 of the London Plan of 105 litres per person per day. This is also in line with levels 3 and 4 of the Code for Sustainable Homes. This level will be achieved through a combination of measures such as low flush toilets and spray taps, but notably also through the use of a centralised grey water recycling system and rainwater harvesting system. The grey water system will collect water from baths, showers and wash basins and this will be used in toilet flushing. The rainwater will be harvested from the roofs and stored in a basement tank. The water will then be used to irrigate the landscape and courtyard areas and for use in communal water features such as car washing.

83 The development is within Flood Zone 3 of the River Thames, meaning that it is in a high risk area, however, the River Thames flood defences provide protection. A flood risk assessment has been carried out for the planning application in line with clause 82 of the outline planning consent. This indicates that the scheme would flooded to a level of 3.3m AOD in the event of a breach of flood defences.

84 To address this, the applicant has incorporated a series of measures, including setting floor levels at a minimum of 4.85m AOD, the use of soft landscaping to introduce some permeability into the site, and incorporating a 377 m³ storm water attenuation tank, although it is not clear where. The applicant states that there is no space on the site to attenuate water, but that the drainage strategies will be implemented on a Peninsula-wide basis. The London Plan requires applicants to demonstrate how they compare to the drainage hierarchy in policy 4A.14, and the applicant should be more explicit in this regard.

Waste

85 The applicant proposes a centralised recycling facility with a chute system to separate recyclable materials from general household waste. A site-wide waste system is being considered for the peninsula and the applicant states that this scheme has been designed to enable connection in future.

Air quality

86 London Plan policy 4A.19 seeks to improve London’s air quality. The proposed on-site energy measures are likely to have an air quality impact that needs to be mitigated. The information presented to date relies on the masterplan application and is limited, however, the scheme is unlikely to have an impact in its own right. If similar proposals occur for each plot on the Peninsula there is concern that the cumulative impact may be an issue. Meridian Delta Limited are currently considering the potential to implement a Peninsula-wide energy scheme that would allow more effective mitigation measures. The Council should ensure that appropriate planning conditions are in place to mitigate air quality impacts.
Transport

87 The site is located on the Greenwich Peninsula, on land to the south west of the O2 and adjacent to the River Thames. It is also close to the A102 Blackwall Tunnel Approach which forms part of the Transport for London Road Network (TLRN). The site is very well served by public transport, being located approximately 300 metres from North Greenwich station, which offers direct interchange with London Underground services on the Jubilee Line, taxis and bus services. Whilst seven different bus routes are currently available at this particular location, the site will also benefit from the implementation of the Greenwich Waterfront Transit (GWT) by 2011. As a result, the site currently records a good Public Transport Accessibility Level (PTAL) of 4 (on a scale of 1-6 where 6 is classed as excellent) which should be further increased in the future with the transport improvements planned for the area.

88 The proposed level of residential car parking (0.47 spaces per unit) is within the London Plan standards and below the level of parking provision previously agreed for the Peninsula as a whole (0.7 spaces per unit), which is welcomed. It is also noted and supported that the parking proposal enables all spaces to be disabled friendly. TfL supports the lack of parking spaces for the retail element of the development, and the introduction of a Controlled Parking Zone (CPZ) within the Peninsula once the Masterplan proposals have been delivered. This should be secured by condition.

89 Secure cycle parking for the residential aspect of the development is being provided at 1.75 spaces per residential unit. This is in line with the required standards contained in TfL’s Cycle Parking Guidance and is therefore welcomed. Although the transport report seems to make no specific reference to cycle parking provision on site for the retail use, the travel plan framework states that 15 spaces will be provided. Clarification on this matter is therefore sought.

90 It is understood that the Masterplan will provide the creation of ‘homes zones’ which will allow pedestrian and cyclists to have priority over car movements. While this is welcomed, it needs to be acknowledged that the implementation of shared surfaces can be difficult for those with visual impairments to navigate. As part of the detailed design and scheme implementation, TfL would therefore require compliance with both DfT’s ‘Inclusive Mobility’ and ‘Shared Space Safe Space’ commissioned by the organisation Guide Dogs for the Blind Association.

6) Although the inclusion of a travel plan framework specific to the site is welcomed, the applicant should ensure that it links comprehensively with the overall travel plan previously agreed for the Peninsula as a whole.

London Development Agency

91 The London Development Agency (LDA) supports the proposal in that it would broadly meet the objectives for economic regeneration, sustain renewal and tackle inequalities as set out in the London Plan (Consolidated with Alterations since 2004) and the Economic Development Strategy (EDS).

92 In this instance, Canary Wharf on the Isle of Dogs not only is the closet employment centre with the highest number of employment opportunities but is also an established international businesses cluster. For these reasons, the Greenwich Peninsula could contribute to London’s role as a Global World City status through substantial provision of leisure, housing and economic activities.
Initiatives to create training and employment opportunities for local people and address other barriers to employment, have been formalised through a section 106 legal agreement under the outline permission is in line with London Plan policy 3B.11 “Improving employment opportunities for Londoners”. The applicant proposes a Deed of Variation which ties to the original agreement which is supported by the LDA in planning report PDU/0187c03. As an appropriate strategy is already in place and as the application proposes similar quantum of development, no further requirements are justified.

Local planning authority’s position

The Local Authority’s position is not known at present.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on housing, urban design, climate change, environmental quality, transport and regeneration are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- Children’s play and informal recreation space (Policy 3D.13): The provision of play and informal recreation space for children and young people is substantially inadequate for the expected child population.
- Noise (4A.20 and 4C.9): The scheme does not fully ensure the separation of a new noise sensitive developments from major noise source at Victoria Deep Water Terminal.
- Energy (4A.1, 4A.3 and 4A.4): The scheme is not supported by detailed modelling work to demonstrate that the CO2 savings from energy efficiency measures related to the actual design.
- Water (4A.13 and 4A.14): Flood risk management measures have been incorporated, however the impact of on-site and masterplan drainage strategies on run-off levels is not demonstrated.
- Transport (3C.22): The proposal is ambiguous in terms of the provision of cycle parking for the retail uses.
On balance, the application does not comply with the London Plan.

The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Children’s play and informal recreation space** Provision for all age groups need to be reconsidered in line with London Plan policy 3D.13 and the associated Supplementary Planning Guidance. The landscape detail and relationship with Meridian Gardens will be significant to the quality of the overall design. The Council is asked to impose a planning condition for the approval of landscaping and to consult the GLA in the discharge of that condition.

- **Noise** – The applicant should provide further information and possibly revisions to ensure there is no conflict with the nearby safeguarded wharf at Victoria Deep Water Terminal

- **Energy** – The applicant should provide further details of the modelling work carried out to demonstrate energy efficiency measures within the scheme.

- **Water** – Demonstrate the impact on run off of water attenuation and sustainable drainage measures within the development and in the wider masterplan drainage strategy.

- **Transport** - Clarification is required for the level of cycle parking associated with the retail element of the development.

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APPENDIX A – Location of local view points (see Design in above report)
**APPENDIX B – Proposed housing mix compared with the requirements of the affordable housing mix in the consented scheme.**

<table>
<thead>
<tr>
<th></th>
<th>Planning Guideline</th>
<th>Scheme Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Affordable Housing Rental Units</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>One bedroom 2p</td>
<td>24%</td>
<td>24% (19 units)</td>
</tr>
<tr>
<td>Two bedrooms 3p</td>
<td>27%</td>
<td>35% (27 units)</td>
</tr>
<tr>
<td>Two bedrooms 4p</td>
<td>25%</td>
<td>18% (14 units)</td>
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<tr>
<td>Three bedrooms 4p</td>
<td>1%</td>
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</tr>
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<td>Three bedrooms 5p</td>
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<td>12% (9 units)</td>
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<tr>
<td>Three / Four bedrooms 6p</td>
<td>11%</td>
<td>12% (9 units)</td>
</tr>
<tr>
<td><strong>Affordable Housing Intermediate Units</strong></td>
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<td>5%</td>
<td>10% (4 units)</td>
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<td>35%</td>
<td>41% (17 units)</td>
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<td>30%</td>
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<tr>
<td>Two bed 4p</td>
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<td>24% (10 units)</td>
</tr>
<tr>
<td>Three bed</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Affordable Housing Discount for Sale Units</strong></td>
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<tr>
<td>Private Units</td>
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<tr>
<td>Studio</td>
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<td>Two bedroom</td>
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<tr>
<td>Three or more bedroom</td>
<td>15-25%</td>
<td>28% (78 units)</td>
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