### Strategic planning application stage II referral (new powers)


### The proposal

Renovation and extension to the National Maritime Museum to provide exhibition space, storage space, reading room and learning/research facility. Renovation of the South West Wing including demolition of the Regatta Cafe, elevation changes, new loading bay/service yard. A new entrance from Greenwich Park incorporating a new lobby, exhibition space and cafeteria.

### The applicant

The applicant is the National Maritime Museum, and the architect is Purcell Miller Tritton

### Strategic issues

This application in Metropolitan Open Land is part of one of London’s most important cultural locations and iconic architectural set-pieces. In urban design terms it represents a significant improvement over the existing extension and would complement the setting of the listed building, the conservation area and the wider world heritage site. The application does not harm London’s strategic views and is strategically acceptable in terms of access and inclusive design, climate change and transport.

### Recommendation

That Greenwich Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal.

### Context

1. On 8 December 2008 the Mayor of London received documents from Greenwich Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 3D of the Schedule to the Order 2008 “Development on land allocated as Green Belt or Metropolitan Open Land in the development plan…and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

2. On 14 January 2009 the Mayor considered planning report PDU/2318/01, and subsequently advised Greenwich Council that the application did not comply with the London
Plan, for the reasons set out in paragraph 69 of the above-mentioned report; but that the possible remedies set out in paragraph 70 of that report could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 26 February 2009 Greenwich Council decided that it was minded to grant planning permission and on 9 March 2009 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Council under Article 6 to refuse the application. The Mayor has until 22 March 2009 to notify the Council of his decision and to issue any direction.

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

5 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

6 At the consultation stage Greenwich Council was advised that the application did not comply with the London Plan as additional transport information and mitigation measures were required. In addition to this, the Mayor asks that further design information be sent so that he may have a better appreciation of the architectural merits of the scheme before making a final decision.

Urban design

7 Following the Mayor’s comment the applicant has submitted additional visuals for the proposal. These include images of the proposed rendering; watercolour elevations and a computer simulated walk through of the proposal. They will be presented to the Mayor at the planning meeting.

8 The additional information confirms the original assessment by GLA officer’s that the proposal comprises a neat and elegant solution to extending a national museum in a very sensitive location. The design provides a new and much improved entrance into a major national museum facility and does so in a modern way that strikes the right balance between the need to respect context whilst establishing its own identity, therefore avoiding pastiche. The scheme represents a significant improvement over the existing extension and would complement the setting of the listed building, the conservation area and the wider world heritage site.

Transport for London’s comments

9 While, at Stage 1, TfL was satisfied that the development would be unlikely to negatively impact on either the Transport for London Road Network or the public transport network, additional information was requested in relation to the pedestrian environment, on-site cycle parking facilities and travel plan. It was also recommended that a delivery and servicing plan be produced for the site and that a contribution towards bus stop accessibility upgrades be secured as part of the s106 agreement.

10 Additional information has been received since Stage 1, and as a result, TfL is now satisfied that the above issues have been adequately addressed by the applicant. In addition, TfL welcomes Greenwich Council’s committee report dated 26 February 2009, which secures by condition, the need for construction vehicles site access arrangements to be approved prior to commencement on site, along with a delivery service plan. TfL also welcomes the draft planning obligations which,
Other comments

11 The proposal has been considered by English Heritage’s London Advisory Committee. English Heritage state that the proposal will make a positive contribution to the setting of the grade I listed buildings that comprise the National Maritime Museum, to the setting of Greenwich Park – including in English Heritage’s Register of Historic parks and Gardens at grade I and to the wider Maritime Greenwich World Heritage Site as well as to the Conservation Area.

12 English Heritage (Archaeology) do not consider that any additional archaeological fieldwork need to be undertaken prior to determination of the application and have suggested a condition to ensure a programme of archaeological work.

13 The Royal Parks Agency approve of the proposal to plant 15-20 new trees to compensate for the loss of two turkey oaks.

14 The Environment Agency does not object to the proposed development.

15 Insufficient detail has been submitted for the London Fire and Emergency Planning Authority to issue a full approval.

16 The World Heritage Site Executive confirm its support for the National Maritime’s Museum southwest wing scheme, the Sammy Ofer wing, as it has evolved since the original concept and look forward to it playing a major role in the World Heritage Site in the forthcoming decades.

17 The Georgian Group state that after consideration of the scheme’s impact on the surrounding landscape it has no objections, with regards to the alterations to the building it defers to the Victorian Society.

18 The Victorian Society has not commented.

19 Friends of Greenwich Park have not registered an objection to the structural planning proposal but made several points in relation to the landscape design.

20 The Greenwich Society welcomes and thoroughly supports and approves the contemporary architecture and low profile of the proposal. It also suggests some constructive comments.

21 Greenwich Conservative Group broadly welcome the proposal but have a few concerns and wish to be involved with the submission of details to follow.

22 Greenwich Council received 2 letters of objection on the grounds that:

- The submitted proposal is too ambitious for the location.
- The proposed new exhibition area is far too large to be accommodated on the site.
- A structure to receive large delivery vehicles should have no place on this world heritage site.
- This development will increase traffic; more and larger trucks will be travelling through our already congested street.
- Loss of trees and shrubs.
- Loss of the proposed herbaceous border.
- The erection of a 2.2m fence to hide the rubbish bins, staff compounds and metal storage containers will be visually intrusive.
Greenwich Council also received 10 letters of support.

**Response to consultation**

24 Matters relating to principle of the development, the design and transport and have been addressed in this and the previous report.

25 Details of the proposed landscaping are not strategic planning matters and have been dealt with by Greenwich Council.

**Legal considerations**

26 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice.

**Financial considerations**

27 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 8/93 (‘Award of Costs in Planning and Other (including Compulsory Purchase Order) Proceedings’) emphasises that parties usually pay their own expenses arising from an appeal.

28 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

**Conclusion**

29 This application in Metropolitan Open Land is part of one of London’s most important cultural locations and iconic architectural set-pieces. In urban design terms it represents a significant improvement over the existing extension and would compliment the setting of the listed building, the conservation area and the wider world heritage site.
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planning report PDU/2138/01
National Maritime Museum, Greenwich

in the London Borough of Greenwich

planning application no.08/2910/F

Strategic planning application stage 1 referral (new powers)

The proposal
Renovation and extension to the National Maritime Museum to provide exhibition space, storage space, reading room and learning/research facility. Renovation of the South West Wing including demolition of the Regatta Cafe, elevation changes, new loading bay/service yard. A new entrance from Greenwich Park incorporating a new lobby, exhibition space and cafeteria.

The applicant
The applicant is the National Maritime Museum, and the architect is Purcell Miller Tritton

Strategic issues
This application in Metropolitan Open Land is part of one of London’s most important cultural locations and iconic architectural set-pieces. In urban design terms it represents a significant improvement over the existing extension and would complement the setting of the listed building, the conservation area and the wider world heritage site. The application does not harm London’s strategic views and is strategically acceptable in terms of access and inclusive design and climate change. Further work is needed with regard to transport before the Mayor sees this application again.

Recommendation
That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 69 of this report; but that the possible remedies set out in paragraph 70 of this report could address these deficiencies. The application must be referred back to the Mayor once a decision has been made to resolve to refuse or grant permission.

Context
30 On 8 December 2008 the Mayor of London received documents from Greenwich Council notifying him of a planning application 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 16 January 2009 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.

31 The application is referable under Category 3D of the Schedule to the Order 2008: “Development on land allocated as Green Belt or Metropolitan Open Land in the development
plan…and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

32 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; or allow the Council to determine it itself, or take over the application unless otherwise advised. In this instance if Greenwich Council resolves to refuse permission it need not refer the application back to the Mayor.

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

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

Site description

35 The Museum lies within the Maritime Greenwich World Heritage site and is situated between Greenwich Park and Romney Road. Immediately to the west of the site is an enclosed garden containing the King William statue, which is adjacent to an access road linking the site to King William Walk. The site occupies land at the south-western wing of the Grade 1 listed National Maritime Museum and is currently occupied by the Grade 1 listed south-west wing of the museum, an uncovered loading bay, the Regatta cafe, a terrace linked to the cafe and a small children’s play area. The site is within a London Panorama (5A.1) and protected view (5A.2) designated by the London View Management Framework SPG.

36 Cutty Sark DLR station, Maze Hill and Greenwich railway stations are all located within 1 kilometre of the site. The site is also served by seven different bus routes with stops located on Trafalgar Road. As such, it has been demonstrated that the site records a public transport accessibility level (PTAL) of 4, out of a scale of 1 to 6 where 6 is considered as excellent.

Details of the proposal

37 The proposal is for an extension to the South West Wing of the Museum to provide new accommodation and address a number of longstanding operational issues. The proposals include:

- Creating a new archive within the existing South West Wing building. Internally this area will be reorganised to maximise storage accommodation and to create a climate controlled environment to safeguard the collection in line with industry best practice.

- A new research and reading room, along with new Interactive and Treasures Galleries, both situated on the lower levels. A total of approximately 850 sq.m. of modern archival storage space will be created.

- A new, flexible exhibition space of approximately 850 sq.m. to allow the museum to stage temporary exhibitions and displays.

- A new cafeteria and brasserie which will replace the existing Regatta Cafe which will be demolished along with the South West Wing projecting bay, water tower and service sheds to the west of the Regatta Cafe.
• The south elevation of the South West Wing will be renovated with the introduction of architectural bays matching those to either side, following removal of the Regatta Cafe and later additions.

• A new purpose designed and enclosed loading bay/service yard utilising the existing access from King William Walk.

• A new entrance from Greenwich Park, which will include a new lobby, exhibition spaces and cafeteria.

• The creation of the new southern entrance into the Museum opens up a new east-west route from King William Walk through to King William Garden and beyond. The associated new landscaping is intended to establish a seamless composition between the park and the Museum based around materials that are consistent with the adjacent spaces.

• The installation of a water attenuation tank located underneath the eastern side of the proposed basement.

• The new special exhibition gallery and plant area are all located below ground. The loading bay and brasserie enclosure will be incorporated into a pavilion style building approximately four metres in height above the proposed podium level.

• Overall a total of approximately 8209 sq.m. of new floorspace is proposed of which 2990 sq.m. is within the existing building and 2082 sq.mat basement level, 1570 sq.m. at the entrance level, and 375 sq.m. at the podium level. A total of 512 sq.m. of existing buildings are to be demolished.

• Existing Museum staff car parking to the east will be maintained and three new disabled car parking bays will be introduced adjacent to the existing Stanhope entrance.

**Case history**

38 There is no strategic case history.

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

39 The relevant issues and corresponding policies are as follows:

- **Metropolitan Open Land**  
  London Plan; PPG2

- **Strategic views**  
  London Plan; View Management Framework SPG; PPG15

- **Urban design**  
  London Plan; PPS1

- **Access**  
  London Plan; PPST; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)

- **Climate change**  
  London Plan; Sustainable design and construction SPG

- **Transport**  
  London Plan; the Mayor’s Transport Strategy; PPG13;

40 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).
Loss of metropolitan open land

41 London Plan policy 3D.10 states that the Mayor should maintain the protection of MOL from inappropriate development. There is a general presumption against development in Metropolitan Open Land, which is afforded the same level of protection as the Green Belt, as set out in PPG2. The applicant will be expected to demonstrate the very special circumstances that exist that could allow the Mayor to accept the principle of development within Metropolitan Open Land.

42 Chapter 3 of the London Plan is concerned with, amongst other things, open space. London Plan policy 3D.10 (Metropolitan Open Land) requires that “The Mayor will and boroughs should maintain the protection of Metropolitan Open Land from inappropriate development.” and states that “any alterations to the boundary of MOL should be undertaken by boroughs through the DPD process, in consultation with the Mayor and adjoining authorities.”

43 The London Plan states that the protection of London’s MOL should be maintained and given the same level of protection as the green belt. As such, there is a presumption against inappropriate development on MOL, and such development should not be approved except in very special circumstances. The London Plan also makes clear that London’s growth should be sustainable and not encroach on London’s own green spaces (page three, paragraph xi). The reference to “inappropriate development” flows directly from PPG2, which sets out the Government’s policy towards Green Belts, but which equally applies to the protection of MOL.

44 The proposed development is considered to be inappropriate development, and PPG2 states that inappropriate development is, by definition, harmful to MOL. It is therefore for the applicant to demonstrate why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to metropolitan open land when considering any planning application or appeal concerning such development.

45 The applicant contends that proposals involve built form set in large grounds whose primary function is ancillary to the use of the open land, in this case the adjoining Greenwich Royal Park. A museum use has been on the site for over 70 years and forms an integral part of Greenwich Park. The proposals will therefore continue the existing museum use.

46 The National Maritime Museum has a longstanding and urgent need to address outstanding issues with the building, improve visitor facilities and enhance its operation through improvements to its archive, gallery space and servicing. This will allow the Museum to increase the number of temporary exhibitions which will make an important contribution to the cultural life of London and its tourism. The new entrance, landscaping (which provides a better integration between buildings and the Park) and catering will add to the overall attractiveness of Greenwich Park, one of the most popular tourist destinations in London. The only practical location for the new development given the constraints set by the Grade I listed buildings and the specific locational need for linkages to Neptune Court is the South West Wing. No alternative suitable locations exist and the specific operational problems which the proposals seek to address occur at the South West Wing. Furthermore the National Maritime Museum Conservation Plan makes clear that the South West Wing is the only location able to accommodate new development without harming the “significance” of the National Maritime Museum.

47 Greenwich Park has in excess of 5.3 million visitors each year, some of whom visit just the park and others the Museum. The park also provides an area of open space for the residents of Greenwich. Catering facilities to support such visitors include the Regatta Cafe and the Royal
Observatory Cafeteria. The proposed development seeks to attract a larger proportion of park visitors to the museum. To achieve this will require a new southern entrance and enlarged and improved catering facilities. Such facilities will be equally available to park users. While the cafe/restaurant and associated facilities form a relatively small part of the total development, they will be supporting the park. As such it will have a de facto ancillary role contributing to visitors’ enjoyment of the metropolitan open land.

48 The applicant has submitted a Design and Access Statement, showing that the application proposals in terms of scale, massing, siting and landscape relate sensitively to other buildings on the site and the adjacent Greenwich Park. The proposals will not be visually intrusive nor impact on the open nature of the area.

49 By comparison with the existing situation, the proposals represent a marked visual improvement. Furthermore, the footprint of the existing buildings and ramps is 644 sq.m. Excluding landscape, which includes new footpaths and terraces the proposed above ground building footprint is 422 sq.m. This represents an overall net gain of approximately 222 sq.m. and make the space more open in character.

50 The location of the new development adjacent to the Grade I listed building and within the World Heritage Site means that any design solution must have full regard to preserving the setting of these buildings. The applicant has shown that the above ground development will relate sensitively to the existing museum buildings and have full regard for the National Maritime Museum Conservation Plan of April 2007 and the Maritime Greenwich World Heritage Site Management Plan.

51 The architect has sought to meet the Museum’s brief and providing a sensitive development has been achieved by reusing the existing South West Wing for the new archive collection and locating the bulk of new development below ground to minimise any visual impact.

52 The new development seeks to integrate the Museum and Park into a more visually and physically unified relationship which will enhance pedestrian movement and amenity of the site.

53 Extensive discussions have been held with English Heritage, the London Borough of Greenwich and other stakeholders with a heritage interest. CABE have been consulted by the Museum and have indicated that given the importance of the heritage issues, the views of English Heritage should predominate. A letter from CABE has been supplied to substantiate this

54 The applicant has demonstrated the need for this development and shown that it will achieve a reduction in above-ground built footprint and a significantly improved level of integration with Greenwich Park and the World Heritage Site. Given this, and having regard for there being no net loss of open land and no loss to the openness of the site, the applicant has demonstrated very special circumstances which, in this case, could allow the Mayor to consider the proposed development to be acceptable.

**London View Management Framework**

55 Greenwich Park is part of Maritime Greenwich and a Grade 1 listed park. The proposals fall within the foreground of the London Panorama designated in the London View Management Framework (LVMF) as visible from the General Wolfe statue. As such, the proposals are subject to Qualitative Visual Assessment (QVA), described in Chapter 3 of the LVMF.
The project site also falls within Protected Vista 5A.2 of St Paul’s Cathedral from Greenwich Park as defined in The London View Management Framework, 2007 (LVMF). The LVMF describes the two positions where panoramic views over London from the elevated ground within Greenwich Park are possible, specifically the view from the orientation board at the General Wolfe statue and the view from the higher ground to the northeast of the statue. There are two Assessment Points:

- Assessment Point 5A.1-Greenwich Park: the General Wolfe statue- at the orientation board overlooking the Queen’s House - looking towards St Paul’s Cathedral
- Assessment Point 5A.2-Greenwich Park: the General Wolfe statue- north east of the statue - looking towards St Paul’s Cathedral.

The applicant, as required by the LVMF, has supplied a Design and Access statement, which includes accurate visual representations of the proposals to enable an assessment of the potential impact on views. The applicant has given detailed consideration to the potential impact of the proposals on views from the assessment points designated in the LVMF, as well as several other prominent views within Greenwich Park.

**Assessment point 5A.1 Qualitative Visual Assessment**

Qualitative Visual Assessment is to be used to assess the visual impact of development on this panoramic view, as stated in the LVMF. The strategically important landmark in this view is St. Paul’s Cathedral. Other landmarks are the buildings of Greenwich Maritime, the O2 (formerly the Millennium Dome), the Monument, and Tower Bridge. Other prominent buildings include the Canary Wharf group of towers, which stand to the east of the principle focus of the view.

Figure 1 illustrates the impact that development proposals for the South West Wing Project will have on this viewpoint. In the fore and middle ground the proposal would be obscured by trees, even in winter, and it is well below the height which would impact on distant panoramic views. This is accepted, furthermore, the proposals involve the removal of the projecting bay (just visible above the trees in the middle of the South West Wing), which should slightly improve the view. The proposed development will not, therefore, have a negative impact on this protected vista.

**Assessment point 5A.2- Geometric definition**

The view of St. Paul’s Cathedral from north east of the General Wolfe statue is managed by geometric definition as well as qualitative visual assessment. The strategically important landmark in this view is, again, St. Paul’s Cathedral. Other landmarks are elements of Maritime Greenwich, the Greenwich Observatory and Tower Bridge that are important aspects of the view. Other prominent buildings and structures include the Canary Wharf group of towers that stand to the east of the principle focus of the view.
The applicant contends that although the proposals fall within the geometric protection cone, the proposals are well below the threshold plane of 30 metres above ordinance datum. This is accepted, therefore the proposed development is not harmful to this view.

Assessment point 5A.2 - Qualitative visual assessment

In the fore and middle ground the proposal would be obscured by trees and it is well below the height which would impact on distant panoramic views, as demonstrated by figure 2. As with Assessment Point 5A.1, a slight improvement in the view will be made when the projecting bay of the South West Wing is removed. The proposed development will not, therefore, have a negative impact on this protected vista.

Urban design

The proposal comprises a neat and elegant solution to extending a national museum in a very sensitive location, the surrounding buildings and adjacent park being grade 1 listed and the wider area being a world heritage site.

The new extension comprises a simple glazed pavilion that has an open and engaging aspect with Greenwich Park and clearly signposts the entrance to the museum without being overly obtrusive in near and more distant views. The architects have a wide experience with alterations to listed buildings and this is apparent in the sensitivity with which they have approached this scheme.

Access to the lower level is down a ramp adjacent to the park, only a single storey would be visible above ground level and this would house the main entrance to the museum, ancillary display and foyer/cafe space. The cafe would have views back over the park.
The linear form of the design is a play on some of the built forms already found in the wider site particularly the linear arcades that lead towards the Queens House. The design provides a new and much improved entrance into a major national museum facility and does so in a modern way that strikes the right balance between the need to respect context whilst establishing its own identity, therefore avoiding pastiche. The scheme represents a significant improvement over the existing extension and would complement the setting of the listed building, the conservation area and the wider world heritage site.

Access and inclusive design

The aim of London Plan Policy 4B.5 and the Accessible London SPG is that proposals aim for the highest standards of accessibility and inclusion (not just the minimum) and that the design process has from the outset considered how everyone, including disabled and deaf people, older people, children and young people, will be able to use the places and spaces that are proposed. A design and access statement has been submitted with the planning application that explains the design thinking behind the application and demonstrates how the principles of inclusive design, including the specific needs of disabled people have been integrated into the proposed development and how inclusion will be maintained and managed.

The site currently has a half level change from north to south and much of the rationale behind the proposed layout lies in the desire to address this. The new scheme includes a sunken south entrance, which allows the development to remove the existing level change from the Neptune Court though to the park entrance. This also improves permeability across the site and aids navigation for all users. The sunken south entrance, which also responds to heritage concerns, is accessible by two ramps with gradients of 1:21. There are also two ramps providing access from the park level up to the terrace, which are 1:20 gradient. Whilst it is acknowledged that there are challenging constraints to this site, and these ramps will be Regulations compliant, they are still
quite steep and it is felt that a more gentle gradient could perhaps be achieved by the use of one ramp, rather than two. The Mayor would welcome consideration of this by the applicant, in an attempt to achieve as gentle a gradient as is reasonably possible and thus further improve accessibility of this facility for all.

69 All rooms within the new extension will have step free access and vertical circulation will be achieved through the addition of three new passenger lifts (one 13-person and two 8-person). These lifts are full passenger lifts, as opposed to platform lifts, and are generally co-located with stair. This is welcomed, as it provides a choice of means of access where there are level changes and does not enforce separation between wheelchair and able-bodied users.

70 The current proposals would greatly enhance disabled WC provision within the museum will be greatly enhanced, with the addition of six new accessible toilets. These will be Unisex accessible toilets and include one designated as an accessible first aid room and adult changing room, which is supported given the chronic lack of such facilities in London.

**Climate change mitigation**

71 London Plan policy 4A.1 sets out how the Mayor will require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise the emissions of carbon dioxide. This policy also sets out the hierarchy that will be used to assess whether applications achieve this, with policies 4A.3, 4A.6 and 4A.7 supporting this and setting out in more detail how the elements of the hierarchy should be applied. An Energy Strategy has been provided, detailing how the development will meet London Plan Climate Change mitigation policy.

*Be Lean*

72 Building Regulation compliant software has been used to determine the emissions baseline for the development, taking into account small power consumption. The resulting emissions for the compliant baseline (Target Emission Rate - TER) are 239.4 tonnes of carbon dioxide per year.

73 A number of design features have been employed to reduce the South West Wing’s baseline energy demand, including specific design solutions retrofitted into the existing listed building. These measures help to reduce the building baseline energy demand by 5% beyond building regulations.

*Be Clean*

74 The energy assessment by the applicant has concluded that there is insufficient base heat load to provide annual worthwhile benefits for the use of CHP. This is accepted.

*Be Green*

75 A renewable energy feasibility study for the site has been undertaken and an Aquifer Thermal Energy Storage (ATES) is to be employed. This is a novel system utilising inter-seasonal storage to satisfy heating and cooling demand, and should provide higher performance efficiencies than a traditional ground source heat pump. A hydrogeological study for the system has been undertaken, which has indicated that this solution is feasible.

76 Utilising this system would reduce emissions by a further 17% after energy efficiency solutions have been taken into consideration.

77 A number of other renewable energy systems have also been considered and rejected. The reasons given for these are accepted.
Summary

78 The applicant has undertaken a thorough analysis of energy and carbon issues related to the development, which is to be welcomed. Furthermore, the applicant has adequately responded to the issues raised at pre-application stage. The proposals represent a well resolved, policy compliant approach, which seeks to make the fullest contribution towards reducing carbon dioxide emissions.

Climate change adaptation

79 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribution to heat island effects, minimise solar gain in summer, contributing to flood risk reductions, including applying sustainable drainage principles, minimising water use and protecting and enhancing green infrastructure. Specific policies cover living roofs and walls and water.

Living roofs and walls (Policy 4A.11)

80 The Mayor expects that living roofs and walls to be incorporated where feasible. The applicant has proposed a ‘green roof’ in the form of areas planted with drought-resistant maritime planting and shingle. This is welcomed as it will increase the biodiversity value of the site and assist in strategic adaptation to the effects of climate change.

Sustainable drainage (Policy 4A.14) and Water use (Policy 4A.16)

81 London Plan policy 4A.16 seeks to ensure that new development has proper regard to the impact of those proposals on water demand and existing capacity by minimising the use of treated water and maximising rainwater-harvesting opportunities. Policy 4A.14 deals with sustainable drainage and seeks to ensure that surface water run-off associated with a proposed development is managed as close to its source as possible, and sets out the following hierarchy of preferred measures to achieve this:

- Store rainwater for later use
- Use infiltration techniques, such as porous surfaces in non clay areas
- Attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse
- Discharge water direct to a watercourse
- Discharge water to a surface drain
- Discharge water to the combined sewer

82 The applicant has proposed harvesting rainwater from roofs for uses such as flushing toilets, supplying washing machines and irrigation, as well as using the green roofs to assist with water attenuation. It has been explained, however, that many other Sustainable Urban Drainage techniques are not suitable on this site due to the location of valuable archive material at basement level and the relatively high groundwater level on the site. This is accepted and the use of rainwater harvesting welcomed.

83 A floodwater attenuation tank has also been proposed, that would be provided under the landscaped area to the south east of the basement. This would use a hydrobrake to restrict the discharge from the site, ensuring that storm water is backed up into the tank for subsequent delayed discharge into the combined sewer. These proposals are supported in line with London Plan policies 4A.14 and 4A.16 and details should be secured by planning condition.
Transport

84 As a result of the modal split information presented in the transport assessment, and the small number of people likely to be travelling to the site by car, the redevelopment is unlikely to have a significant impact on the road network. However, should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

85 Regarding car parking proposals as part of this application, only three additional blue badge car parking spaces are being proposed as part of the redevelopment of the site and this is acceptable.

86 The proposed new pedestrian entrance which is to provide step free access to the museum is welcomed. In accordance with the London Plan policy 3C.21, however, confirmation is required that all footways within the vicinity of the site are a minimum of 2 metres wide, smooth, level and free of street clutter and ponding issues. Where this is not the case, the applicant will be expected to make a contribution towards any remedial works deemed necessary and this should be secured by section 106 agreement. In addition, all crossings in the vicinity of the site should be fully accessible to pedestrians with disabilities by complying with BV165 standards and providing tactile paving and dropped kerbs. Where crossings fail to meet such standards, a financial contribution should also be sought towards their upgrade. Adequate signage should also be in place in order to direct visitors between the museum and public transport facilities.

87 While it is accepted that an adequate level of cycle parking is being provided on site, and that it will be increased should future demand exceed 85% of current supply, in accordance with the London Plan policy 3C.22 it is recommended that staff parking be separated from visitor parking in order to provide dedicated secure parking spaces for staff members. In addition, if feasible, it is recommended that the applicant considers relocating the cycle parking spaces to a more visible location in order to make them more prominent and thus further encourage cycling to the museum.

88 It is accepted that the development is likely to have a negligible impact upon the local bus network capacity and Docklands Light Railway (DLR) services. Despite this, and given that the development site is likely to generate additional bus trips, it is expected that the developer upgrade all bus stops within 400 metres of the site that do not meet TfL standards. In light of TfL’s recent condition surveys undertaken at some nearby bus stops, a sum of £31,000 will be required for this work, and should be secured by section 106 agreement.

89 The submitted travel plan requires further information. In accordance with the London Plan policy 3C.2 further objectives are required as are targets for modal shift. The appointment of a travel plan co-ordinator is welcomed but their roles and responsibilities and how the position is to be funded requires more detail. A marketing strategy also needs to be included as this is an essential part of the travel planning process. Most of the planned measures are good, although making the car park available to visitors during the weekend when there is more staff car parking spaces available does not encourage travel by public transport. Finally, baseline travel surveys followed by years one, three and five monitoring must be conducted, with the initial travel survey taking place after six months.

90 While the inclusion of a Construction Environmental Management Plan (CEMP) is welcomed, in accordance with the London Plan policy 3C.25, the applicant is encouraged to produce a Delivery and Servicing Plan (DSP) for the site. Of the three construction routes proposed, Option 1 is favoured as it provides the best vehicular access. The site holding area to prevent traffic overspill is welcomed and consideration should be given to a booking system to improve these arrangements.
It is also advised that during construction and whilst the development is operational that the developer be committed to procuring environmentally sustainable firms, such as those that can demonstrate willingness to adopt sustainable measures in logistics such as TfL’s Freight Operator Recognition Scheme.

91 In conclusion, while the development is unlikely to have a significant impact on the highway or public transport network, additional information and adequate mitigation measures are required to ensure that the development is acceptable and in compliance with London Plan policies 3C.2, 3C.20, 3C.21 and 3C.25.

Transport for London’s comments

92 Subject to the issues above being resolved Transport for London has no objection to this proposal.

London Development Agency’s comments

93 London Plan Policy 3B.9 ‘Tourism industry’ seeks to enhance the quality and appeal of London’s existing tourism offer and to create integrated and sustainable new products and destinations especially outside the central London core. In support of this, a key aspect of the London Tourism Vision (2006 – 16) is that London will deliver a top quality visitor experience from pre-arrival to post departure, ensuring full satisfaction from all aspects of a visit to London. Therefore, a strategic priority of the London Tourism Action Plan is to improve the quality of the tourism product and visitor experience. The South West Wing Project at the National Maritime Museum will significantly improve the visitor experience at the museum by creating new exhibition space and improving facilities including a new accessible archive storage and research centre.

94 Given the scale of the development, Greenwich Council should seek to ensure that local residents and businesses benefit from the development during it’s construction as well as the 24 jobs which the applicant has stated will be created as a result of the development. In accordance with London Plan Policy 3B.11 ‘Improving employment opportunities for Londoners’ and 3B.1 ‘Developing London’s economy’ the applicant should seek to ensure that the wider benefits of the proposal are maximised in order to improve employment opportunities for Londoners, to remove barriers to employment and to tackle low participation in the labour market.

Local planning authority’s position

95 It is understood that Greenwich Council Planning Committee intend to consider this application on 26 February 2009. It is not known what Greenwich Council officer’s recommendation will be.

Legal considerations

96 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. 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
Conclusion

98 London Plan policies on Metropolitan Open Land, strategic views, urban design, access and inclusive design, climate change and transport (insert relevant topic headings, e.g. housing, affordable housing, strategic views) are relevant to this application. The application (amend the following if required) complies with some of these policies but not with others, for the following reasons:

- Metropolitan Open Land: The applicant has demonstrated the very special circumstances by which the Mayor may consider this development to be acceptable.

- Strategic views: The applicant has provided accurate visual representations of the proposals and demonstrated that the scheme would have no negative impact on strategic views. The application complies with London Plan policy on strategic views and with guidance set out in the London Views Management Framework.

- Urban design: The design is generally well resolved and sympathetic to its sensitive context and is generally compliant in London Plan design terms.

- Access and inclusive design: The application complies with London Plan policy on access and inclusive design.

- Climate change: The scheme seeks to minimise carbon dioxide emissions and incorporates a number of measures ensuring that it is compliant with London Plan policy on climate change mitigation and adaptation.

- Transport: The application is not compliant with London Plan transport policy, specifically policies 3C.2, 3C.20, 3C.21 and 3C.25.

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

- Transport: Additional information and adequate mitigation measures are required in line with advice given in paragraphs 56 to 63.

100 Notwithstanding changes that would ensure compliance with the London Plan, the application could be improved by giving further consideration to the lessening of gradients, as outlined in paragraph 39.

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