Strategic planning application stage 1 referral (new powers)


The proposal

The proposal is for a hybrid application for outline planning permission and full details of Phase 1. The outline proposal includes 4,000 residential units, 37% of which will be affordable housing including 303 care home flats. A mix of other uses is also proposed including retail and leisure, office, community space, hotel, GP surgery and a replacement primary school. The proposals include associated landscaping, new open space, vehicle and cycle parking. Phase 1 of the development will be for 449 units, 50% of which will be affordable (split as 59/41 social/shared ownership).

The applicant

The applicant is Berkeley Homes Ltd, and the architect is Lifschutz Davidson Sandilands

Strategic issues

The application is supported in principle and will facilitate the significant planned regeneration of the Kidbrooke area, in particular the renewal and replacement of the Ferrier housing estate. Whilst this is the case, the application raises a number of strategic issues including the loss of affordable housing, affordable housing quantum, housing mix and density, energy and climate change, urban design, access and transport.

Recommendation

That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 143 of this report; but that the possible remedies set out in paragraph 145 of this report could address these deficiencies.

Context

1 On 17 November 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 14 January 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 Category 1A.1, 1B.1c and 3A.1a of the Schedule to the Order 2008: “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats” and, “Development (other than development which only comprises the provision of houses, flats, or houses and flats), which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres” and “Development which is likely to result in the loss of more than 200 houses, flats, or houses and flats (irrespective of whether the development would entail also the provision of new houses or flats)”.

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.

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.

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

**Site description**

**Kidbrooke Development Area SPD**

The application site falls within land identified in Greenwich Council’s Kidbrooke Development Area Supplementary Planning Document (SPD). The SPD covers an area of approximately 109 hectares and includes, for the majority part, the existing Ferrier housing estate. The estate is a mix of residential units and large areas of open space comprising 1,900 social rented units. It is located between Kidbrooke to the north, Eltham to the east and Blackheath and Lee Green to the west. The World Heritage Site of Maritime Greenwich is located beyond Blackheath Park to the northwest.

Kidbrooke railway station is at the northern end of the SPD area. The railway line cuts through the SPD area creating a barrier between the northern part of the site, which includes the existing Thomas Tallis school, a mix of commercial buildings, bus terminal and other areas of open space. To the south of the railway is the main housing estate, beyond which is further open space of Sutcliffe Park and private leisure centre (David Lloyd). The majority of the southern area beyond the estate is designated as Metropolitan Open Land. Other designations include a Site of Nature Conservation Importance (south of the estate), Green Chain, and Flood Zone 2 and 3 (south of the estate). The site is adjacent to Blackheath Conservation Area to the north west and Phase 1 is adjacent to Eltham Conservation Area, located along the south eastern boundary.

**Application site**

The hybrid application boundary measures 48.2 hectares (see figure 1). This includes the existing Ferrier Estate, large area of open space and an area of land to the southeast of the estate known as Harrow Meadow, currently a greenfield site that is the proposed location for Phase 1 of the development.

A number of existing buildings will continue to operate within the application site, including Kidbrooke train station (Network Rail), The Holy Family Primary School, Meadows House Nursing Home and residential units in Kimble Place.
In terms of transport the masterplan area is located along the A2213 Kidbrooke Park Road, and is bound to the south by the A20 Eltham Road and to the north by the A2 Rochester relief road, all of which form part of the Transport for London Road Network. The site is currently directly served by two bus routes, the B16 and the 178, which operate along Kidbrooke Park Road. Six further services are also located within walking distance of the application site and run along Eltham Road. Kidbrooke mainline railway station is located at the north end of the site and operates limited services between London and Kent. As such, the public transport accessibility level varies across the development site from 2 to 3, out of a range of 1 to 6 and where 6 is considered as excellent.

Figure 1 existing Ferrier Estate layout and application boundary (source: Design and Access statement November 2008).
Figure 2 Existing Ferrier Estate looking north (source: Design and Access statement November 2008).

Figure 3 Typical block: existing (source: Design and Access statement November 2008).
Details of the proposal

Outline planning permission:

11 The outline application includes a mix of uses as set out in table 1.

<table>
<thead>
<tr>
<th>Proposed use</th>
<th>Quantum</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential (C3)</td>
<td>4,000 units (37% affordable)</td>
</tr>
<tr>
<td>Retail (A1 – A5)</td>
<td>3,100 sq.m.</td>
</tr>
<tr>
<td>Supermarket (A1)</td>
<td>2,785 sq.m.</td>
</tr>
<tr>
<td>Leisure (D2)</td>
<td>2,782 sq.m.</td>
</tr>
<tr>
<td>Office (B1)</td>
<td>5,450 sq.m.</td>
</tr>
<tr>
<td>Hotel (C1)</td>
<td>5,911 sq.m.</td>
</tr>
<tr>
<td>Community use (D1)</td>
<td>4,884 sq.m.</td>
</tr>
<tr>
<td>GP surgery (D1)</td>
<td>3,205 sq.m.</td>
</tr>
<tr>
<td>Replacement primary school (D1)</td>
<td>2,408 sq.m.</td>
</tr>
</tbody>
</table>

12 The indicative masterplan layout is shown in Figure 4. This also illustrates areas beyond the boundary of the application site. A total of 4,000 residential units are proposed within the boundary of the application site. The units will be split as 2,525 (63%) private and 1,475 (37%) affordable housing units. Within the affordable component of the scheme 50% will be social rented accommodation and 50% will be for shared ownership. 303 of the social rented units are proposed as extra care units.

13 The majority of the commercial and non-residential uses will be located at a new local centre around the existing Kidbrooke train station. This area will be know as the ‘Hub’.

Phase 1 application

14 Phase 1 provides 449 residential units located to the south east corner of the site. Table 2 shows the proposed tenure split and bedroom size mix for phase 1. As set out in table 2, Phase 1 proposes 225 (50%) market and 224 (50%) affordable units. The affordable housing units will be split as 133 (59%) social rented and 91 (41%) shared ownership.
Table 2 Bedroom size mix: Phase 1

<table>
<thead>
<tr>
<th></th>
<th>Studio</th>
<th>1-bed</th>
<th>2-bed</th>
<th>3-bed flat</th>
<th>3-bed house</th>
<th>4-bed house</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social rent</td>
<td>0</td>
<td>38</td>
<td>22</td>
<td>1</td>
<td>66</td>
<td>6</td>
<td>133</td>
</tr>
<tr>
<td>Intermediate</td>
<td>7</td>
<td>32</td>
<td>25</td>
<td>19</td>
<td>6</td>
<td>2</td>
<td>91</td>
</tr>
<tr>
<td>Market</td>
<td>9</td>
<td>58</td>
<td>99</td>
<td>59</td>
<td>0</td>
<td>0</td>
<td>225</td>
</tr>
<tr>
<td>Total</td>
<td>16</td>
<td>128</td>
<td>146</td>
<td>79</td>
<td>72</td>
<td>8</td>
<td>449</td>
</tr>
</tbody>
</table>

Figure 4 Indicative masterplan layout (including areas outside the application boundary).
Source: Masterplan design drawings November 2008.

15 The layout of Phase 1 is shown in figure 5.
Both the masterplan layout and the Phase 1 layout follow a mix of ‘C’ shaped perimeter blocks that face onto the central corridor of open space that runs through the centre of the site (see figure 4). The central corridor of open space has been achieved by allowing a land swap at the south-eastern corner of the site and forms the key open space aspiration of the site to facilitate the decant process and construction of Phase 1.

The blocks range in height from single story up to nine storeys, with the taller elements located at key points facing the open space and at the transport interchange (the ‘Hub’). A mix of unit types will be included across the masterplan including houses, maisonettes and flats.

**Case history**

The proposals form a significant part of the wider Kidbrooke masterplan as set out within Greenwich Council’s adopted Kidbrooke Development Area SPD. Whilst the Mayor has not considered any formal applications in connection with the SPD to date, the GLA has been involved in the various consultation stages of the SPD.

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

The relevant issues and corresponding policies are as follows:

- **Economic development**  
  *London Plan; the Mayor’s Economic Development Strategy*
- **World city role**  
  *London Plan*
• 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
• Urban design
  London Plan; PPS1
• Mix of uses
  London Plan
• Regeneration
  London Plan; the Mayor’s Economic Development Strategy
• Transport
  London Plan; the Mayor’s Transport Strategy; PPG13
• Parking
  London Plan; the Mayor’s Transport Strategy; PPG13
• Open land
  London Plan; PPG17
• Green Belt/MOL
  London Plan; PPG2
• Biodiversity
  London Plan; the Mayor’s Biodiversity Strategy; Improving Londoner’s Access to Nature: Implementation Report; PPS9
• Access
  London Plan; PPST; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)
• Equal opportunities
  London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)
• Sustainable development
  London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG
• River Thames/flooding
  London Plan; Mayor’s draft Water Strategy; PPS25, RPG3B

20 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 July 2006 Greenwich Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

21 The following are also relevant material considerations:
• The Core Strategy Issues and Options (February 2008).
• The Kidbrooke Development Area Supplementary Planning Document.

Principle of development

Intensification and estate renewal

22 London Plan policy 2A.6, and map 2A.1 identifies Kidbrooke as an ‘Area of Intensification’. The London Plan states that “these areas have significant potential for increases in residential, employment and other uses through development or redevelopment of available sites and exploitation of potential for regeneration, through higher densities and more mixed and intensive use” (paragraph 2.14).

23 The London Plan also focuses on Kidbrooke at paragraph 5.123, which states, “The Kidbrooke Area centres on Kidbrooke rail station and will include the Ferrier housing estates together with adjoining recreation facilities. A masterplan for the redevelopment of the area is being prepared, with the aim of creating a sustainable mixed-use neighbourhood incorporating at least 2,400 additional new homes. The development should focus on integrating the station, which will have improved links to north Greenwich, with the surrounding area and improving links within the area across existing roads and rail lines.”
24 At local level, Greenwich Council has recently published the Kidbrooke Development Area Supplementary Planning Document (June 2008) which sets key development aspirations and supplements the Council’s UDP Policy H4. The key objectives within the SPD seek to achieve the following:

- Create a mixed neighbourhood and community.
- Provide approximately 4,400 units including the replacement of 1,900 affordable homes.
- Create quality open space.
- Provide a local shopping centre.
- Improve transport interchange and public transport.
- A minimum of 43% affordable housing across the SPD area.
- A minimum of 50% affordable housing on the Greenfield sites allocated for new housing.
- A 70/30 split between social rent and intermediate housing.

25 The principle of intensification for a mix of uses including the renewal of the Ferrier Estate is identified as a strategic aspiration, as set out in the London Plan and Greenwich Council’s UDP and supporting SPD. As such the parameters for land use set out in the outline application are supported and are consistent with London Plan policy 2A.6 and 5D.3.

**Commercial development: New local centre ‘The Hub’**

26 The application falls outside the Town Centre boundary of Woolwich, Eltham and Greenwich. Whilst this is the case, a local centre for Kidbrooke, ‘the Hub’ has been identified within Greenwich Council’s UDP, Policy H4, and within Greenwich Councils UDP Proposals Map (Policy STC2 (iii)) and the Kidbrooke Development Area SPD. Table 5D.1 of the London Plan also identifies an indicative employment capacity for Kidbrooke of 400 new jobs, in the period up to 2026, subject to adequate transport capacity improvements.

27 PPS6 specifies the following key considerations in assessing planning applications for the development of town centre uses:

- Assessing the need.
- Securing appropriate scale of development.
- Applying the sequential approach to site selection.
- Assessing the impact.
- Ensuring locations are accessible.

28 In identifying the site as a local centre in the UDP, town centre uses are acceptable subject to the appropriate scale of uses suitable for a local centre. In this regard the parameters for the appropriate scale and mix of uses within the new local centre are set out within the Council’s SPD. Whilst the proposed scale and mix of uses exceeds some of the parameters within the SPD, the mix and scale will meet locally arising need, generated from the estate renewal and intensification of
the masterplan area in an identified local centre within the plan. Subject to the impacts on the transport network being acceptable (see transport comments) the approach is consistent with PPS6 and London Plan policies 3D.1, 3B.2 and 3D.7.

**Metropolitan Open Land**

29 The London Plan states that the protection of London’s MOL should be maintained and points out that there is a general presumption against inappropriate development on MOL, and such development should not be approved except in very special circumstances (policy 3D.9 and 3D.10).

30 A significant feature of the SPD area and the application site is it includes substantial areas of Metropolitan Open Land. To enable the estate renewal to proceed in appropriate phases Greenwich Council’s UDP was amended to accommodate a land swap at the south-eastern corner of the site (see figure 6). Land to the southeast corner was originally designated as MOL. To accommodate the complexities of estate renewal whilst maintaining and enhancing the openness of the MOL, a land swap was proposed. This approach was successfully tested as part of the UDP examination process and the plan amended accordingly.

31 The south-eastern corner of the site will therefore form phase 1, as originally planned. This will facilitate the decant process and redevelopment of the site outside the designated areas of MOL.

Figure 6 UDP Proposals Map showing green corridor (labelled ‘o3’) through the centre of the Kidbrooke development area (source: Design & Access Statement, November 2008)
Impact on openness

32 Whilst the areas for construction have been formally de-designated to fall outside the MOL, the proposals will still result in an impact on the adjacent MOL. The formal policy test set out in PPG2 is not required given the proposals fall outside the MOL, however, the impact on “visual amenity” from the MOL is still a material consideration, in particular regarding proposals that would be “visually detrimental by reason of their siting design and materials” (paragraph 3.15, PPG2).

33 The design team has given reasonable consideration regarding the impact on the adjacent MOL. In particular, the buildings that face onto the MOL corridor that runs through the site have been designed in a series of ‘C’ shaped blocks, thereby reducing the built frontage that faces the MOL boundary. An element of open space is designed to feed into the central courtyards of each block providing a design break that attempts to soften the appearance and relationship between the built form and the MOL.

34 This has been generally successful across the scheme. Having regard for the detail set out in Phase 1, the design and use of materials appears appropriate in this sensitive context and the level of openness remains a distinct feature of the masterplan, with the new corridor of open space reinforcing the MOL and green chain status. Having regard to the detail set out in Phase 1, the harm to the openness has been managed appropriately and should be carried through to the remaining phases of the masterplan design through the use of the design code (further comment is set out in the design section of this report). The proposals are consistent with PPG2 and London Plan policy 3D.9 and 3D.10.

Nature conservation

35 Part of the site to the north of the masterplan area is designated a site of nature conservation importance (Proposals Map NC38: Blackheath to Falconwood Railsides, Borough importance Grade 2). Whilst not of strategic importance, the Council should be satisfied that the proposed masterplan does not undermine this local designation as it is not clear whether the protected area is retained under the proposed masterplan layout.

Housing

Affordable housing

36 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.

37 Policy 3A.10 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
38 Where borough councils have not yet set overall targets as required by Policy 3A.9, they should have regard to the overall London Plan targets. It may be appropriate to consider emerging policies, but the weight that can be attached to these will depend on the extent to which they have been consulted on or tested by public examination. Greenwich Council’s UDP was adopted in 2006 and was subject to general conformity test with the 2004 London Plan. Policy H14 of the UDP is the overarching affordable housing policy. Given the recent adoption of the UDP, the LDF is at the very early stages of consultation and holds limited weight. As such policy H14 and London Plan policies on affordable housing provide the local and strategic policy position in negotiating affordable housing on individual planning applications within the borough.

Estate renewal

39 London Plan Policy 3A.15 seeks to prevent the loss of affordable housing. Paragraph 3.75 states that “Where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace”. The Mayor’s Supplementary Planning Guidance on Housing provides further policy context in respect of estate renewal, and emphasises (paragraph 20.1) that in redeveloping affordable housing there should be no net loss. Particular concern is raised with regard to the loss of social rented provision in estate renewals.

40 The Mayor’s SPG (Para 20.3) provides that ‘to achieve 100% replacement of demolished social rented units, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision or to achieve a mixed and balanced community objective. In such a case, the net gain in total provision need not achieve the usual proportion of affordable housing provision expected from a new build development’.

Outline application

41 The Ferrier Estate currently comprises 1,900 residential units, which are scheduled for demolition. These were all originally social rented, however some of the ownership has been transferred through ‘right to buy’ legislation.

42 Limited information has been provided regarding the existing 1,900 residential units, for example, ownership, the bedroom size mix, under occupancy levels, overcrowding levels or sizes of the existing units in terms of square metres.

43 The proposed application includes the erection of 4,000 units, of which 1,475 would be affordable. It is not clear how the replacement units will be provided in terms of bedroom size mix for the overall outline application. The planning statement provides the following broad targets across the outline application:

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Market</th>
<th>Affordable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio/1 bed flat</td>
<td>27.7%</td>
<td>33%</td>
</tr>
<tr>
<td>2 bed flat</td>
<td>44.4%</td>
<td>39%</td>
</tr>
<tr>
<td>3 and 4 bed flats/houses</td>
<td>28.8%</td>
<td>28%</td>
</tr>
</tbody>
</table>
There is limited information regarding precise bedroom size mix across all tenures for the outline application. There is no estimated floor space sizes for units and therefore it is not clear whether there is a net gain or loss in affordable housing quantum having regard to the existing circumstances.

To ensure the proposals are consistent with the London Plan the applicant should, as a starting point, seek to ensure there is no net loss of affordable housing, in particular loss of social rented housing. In pure numerical terms the proposals currently result in a net loss of affordable housing units (425 units assuming all existing units within the estate are affordable). The loss of affordable housing is inconsistent with London Plan policy 3A.15, the guidance within the GLA’s Housing SPG and the Kidbrooke Development Area SPD.

Notwithstanding the above, the applicant has not provided sufficient information regarding the existing estate to be able to compare the existing units and habitable rooms against the proposed units and habitable rooms. For example, neither the existing breakdown of habitable rooms within the estate, nor the proposed breakdown of habitable rooms for the affordable component of the proposed outline application, has been provided. The current approach has therefore not been fully explained and the net loss of affordable housing not fully justified.

The overall split between social rented accommodation and shared ownership accommodation is also inconsistent with both the London Plan and SPD’s target split of 70/30 (social rented/shared ownership) and also the Mayor’s target aspiration for 60/40 as set out in his direction of travel document (Planning for a Better London, July 2008). The approach has not been justified.

The applicant is yet to provide full details regarding the financial viability of the proposals. Greenwich Council has appointed an independent valuer to scrutinise the merits of the viability work. The GLA has been in discussions with the appointed valuer but will also need to scrutinise the material to ensure the proposal is consistent with the London Plan and the GLA’s Housing SPG. The GLA will be looking for an appropriate review mechanism regarding viability over the phasing and building out period. Further work is therefore required before the proposals are referred back to the Mayor for final determination.

Extra care dwellings

The applicant proposes that 303 of the affordable units will be social rented extra care dwellings. There is limited explanation regarding the exact merits of this particular housing product, or how the product will be managed. Further information should be provided, in particular the nature of management and the anticipated level of care. The applicant must demonstrate that the proposed extra care units fall within the definition of affordable housing as set out in PPS3, the London Plan and the GLA’s housing SPG.

Phase 1

The bedroom size mix and affordable housing split for Phase 1 is set out in table 1. This includes 50% market and 50% affordable housing. The affordable component of Phase 1 will be split as 59/41, social rented/shared ownership. Phase 1 includes significant provision of social rented family houses with private garden space. Front-loading the family provision in phase 1 is supported. Notwithstanding this approach, the applicant is still required to provide full financial modelling as set out above, and to provide further justification regarding the loss of affordable housing across the scheme. The Mayor will require sufficient evidence in determining the application at that the maximum reasonable amount of affordable housing is being delivered in this instance as required by London Plan policy 3A.10.
Density

51 Policy 3A.3 of the London Plan aims to maximise the potential of a site taking account of local context, London Plan design principles and public transport capacity. Table 3A.2 of the London Plan provides a framework for assessing density based on habitable rooms and dwellings per hectare. The applicant has advised that the scheme provides a density of 108 dwellings per hectare. Further details regarding habitable rooms should be provided to allow a more accurate calculation of density and to ensure this can be interpreted having regard to the density matrix within the London Plan.

Design

52 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network.

Masterplan

53 The masterplan is generally well considered and expands positively on the master plan vision in the SPD developed by EDAW. The extension of a central corridor of public open space will create the focal point of the development, and introduce new MOL in the borough as part of a land swap with Phase 1 to the south-eastern corner of the site. The land swap will facilitate the final stages of the existing estate decant and will provide and overall net gain in MOL, with approximately 4.5 hectares additional area of open space.

54 The retention of the main arterial route along Kidbrooke Park Road is supported in design terms. Similarly the relocation of the bus terminal, currently north of the railway line, to create a new transport interchange ‘the Hub’ to the south of the railway line is supported in design terms.

55 The raised arterial route currently acts as a significant barrier between the east and west of the estate and the raising of landscape levels to create a level access to the highway is supported and will help to design out the physical barriers and segregation inherent with raised highways.

56 GLA officers raised concerns during pre-application discussions regarding the proximity of the relocated Wingfield School adjacent to the railway line. The design team has provided limited justification for its location. The rationale to locate the school near the ‘Hub’ and open space is supported, however the exact proximity backing onto the railway needs further consideration. Similarly the extra care social rented flats have been located backing onto the railway. This location is one of the poorer across the masterplan area. The rationale to locate the extra care units in this location needs to be further justified, in particular given the tenants in these units are likely to be less mobile and unlikely to benefit for the same level of choice as those who purchase on the open market.

Block layouts

57 The principle blocks facing onto the central park will be ‘C’ shaped and generally be higher density. The rationale of extending (visually) the park into the courtyard of each block is supported. The treatment of how the interface between the private courtyard function and public open space of the central park needs careful consideration.
Whilst the continuation of open space from the MOL to the central courtyards is supported, there is a significant level change between the two points. Therefore, inclusive access from the courtyard to the open space needs to be considered in more detail. The plans and sections illustrate the current stepped arrangement between the courtyard and the park. This presents a significant barrier to buggies, wheelchairs and people with limited mobility. Management of the space and security will also need to be considered to ensure the space is legible and there is a clear definition between what is public and private space.

**Phase 1**

Phase 1 includes 449 units, which includes 369 flats and 80 houses. The flats will be arranged as four ‘C’ shaped blocks facing the park with two smaller linear blocks facing the park and a larger linear block that will bookend phase 1 to the south (see figure 5). The eastern boundary will include the 80 houses set as two perimeter blocks.

The internal arrangement of the ‘C’ shaped blocks is broadly supported. The ground floor duplex units providing animation to the street and contribute to the provision of double aspect accommodation. Double aspect accommodation has been maximised elsewhere in each block with a limited number of north facing units. Those units which are due north project from the facade of the building to allow light slits and balcony space providing an east and west aspect, albeit fairly small. Overall the internal layout and aspect of the flats has been well considered and the careful approach to the quality of the internal residential environment is welcomed.

Vehicle access to the ‘C’ shaped blocks is shared between 2 blocks to create intermittent green fingers, a further theme, of the continuation of the park into the urban environment. The relationship of each block with the park (the interface between the two) will need further consideration as previously raised above.

The linear blocks require further consideration. The current park elevation (west) and east elevation are not entirely successful. It is not clear whether the metal balustrade (25 on drawing P0166) will be accessible to the units and therefore whether this will act as balcony space. The interface between where the building meets the park is fundamental and needs to be clearly illustrated. Similarly, the arrangement along the east elevation is through ramped access or steps. The opportunity to create level access at this point, similar to the ‘C’ shaped blocks should be considered. Further work on this relationship is required and will apply to most of the other linear blocks with the master plan.

The perimeter block layout to the housing is supported. The internal arrangement of the terraces at ground floor has been amended following pre-application discussions to improve the level of natural surveillance onto the street elevation. The street elevation now includes the kitchen windows facing onto the street, rather than the originally proposed WC. This is a significant improvement in terms of layouts.

**Architectural appearance**

The outline application will be informed by the detailed codes set out in the design and access statement. It should be explicit that the design code for the masterplan will inform the detailed design of the phases across the development. Further discussion on the use of the design code to fulfil this role will need to be undertaken between the Council, the applicant and the GLA.

The appearance of Phase 1 is generally high quality. The ‘C’ shaped flats comprise a mix of brick, timber and glazing with fairly deep window reveals which provides a contemporary appearance (see figure 7).
The housing elevations in particular deliver a playful style to the housing design. The quality of the materials between the private and affordable blocks should remain consistent to ensure a tenure blind relationship between blocks across the development.

Figure 7 mix of materials for the C shaped blocks source: Design and Access statement November 2008.

Figure 8 ‘C’ shaped blocks facing onto open space of Sutcliff Park source: Design and Access statement November 2008.
Character and appearance of the Conservation Area

67 The masterplan area lies adjacent to two Conservation Areas. Blackheath Conservation Area to the north west and Phase 1 is adjacent to Eltham Conservation Area, located along the south eastern boundary. The detail provided within Phase 1 illustrates high quality architecture. Subject to the agreement of the design coding, the quality of architectural appearance will remain at a similarly high standard to ensure the proposals will preserve the special character and appearance of the Conservation Area.

Access

68 Policy 3A.5 of the London Plan requires all new housing to be built to ‘Lifetime Homes’ standards and 10% of all new housing to be designed to be wheelchair accessible to meet the full range of housing needs. London Plan Policy 4B.5 ‘Creating an inclusive environment’ states: “Design and access statements should be submitted with development proposals explaining 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”

69 Although the applicant makes significant commitment to meeting Lifetime Homes standards and commitment to minimum 10% wheelchair units, there are a number of detailed elements within the design and layout of blocks that needs further consideration in terms of inclusive access. These have been identified in the comments above.

70 The applicant should also consider commitment to the provision of accessible hotel bedrooms as part of development of hotel uses within the local centre. Subject to further consideration of these matters the overall strategy across the masterplan area is broadly supported.

Design summary

71 The broad parameters of the masterplan are strongly supported in design terms. There are, however a number of detailed areas that require further consideration, as set out above, before the proposals meet with the design aspirations of the London Plan.

Children’s play space

72 Policy 3D.13 of the London Plan sets out that “the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs”. The application is unclear regarding the bedroom size mix and therefore an accurate calculation regarding expected child occupancy levels cannot be undertaken at this time. The applicant needs to provide a clear breakdown of the proposed bedroom size mix for the masterplan.

73 Notwithstanding the above, the masterplan is formed on the aspiration to deliver open space at close proximity to all residential units through a range of open space and play space opportunities:

- Local Areas of Play – every 100 metres.
- Local Equipped Areas for Play – every 400 metres.
- Neighbourhood Equipped Areas for Play – Every 1000 metres.
- Multi Use Games Areas – Every 1000 metres.
- New MOL open space – 45,000 sq.m.
- New allotment space.

74 The open space strategy for the masterplan and Phase 1 represents one of the strongest elements of the masterplan design and the hybrid application as a whole. Whilst the applicant is required to provide accurate details regarding the expected child occupancy levels, the approach is likely to exceed the requirements of London Plan policy 3D.13 and the guidance within the SPG.

**Energy**

75 London Plan policies 4A.4 and 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction methods, demonstration of how heating and cooling systems have been selected in accordance with the Mayor’s hierarchy and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy.

**Masterplan**

**Baseline emissions and energy efficiency (Be lean)**

76 London Plan policy 4A.3 seeks that borough’s “ensure future development meet the highest standards of sustainable design and construction”. The baseline carbon emissions for all phases of the scheme have been calculated using benchmarks. The estimated carbon emissions for the whole scheme are 11,428 tonnes per annum. For the domestic element the applicant has used benchmarks to estimate carbon emissions, however, it is not clear how those benchmarks relate to Building Regulations 2006.

77 The applicant has not proposed energy efficient design measures that will reduce carbon emissions below Building Regulations 2006 for any phases subsequent to Phase 1. The applicant should commit to demand reduction measures that will be applied to the flats and houses in order to reduce carbon emissions beyond Building Regulations 2006 minimum requirements across all phases. Energy efficiency measures proposed should be at least as good as the standards expected in Phase 1 (see comments below on Phase 1) and the principles of energy efficient design should be linked to the design code of the scheme to inform the reserved matters planning applications.

78 For the non-domestic element benchmarks for 2002 best practice have been used to calculate carbon emissions and adjusted by 20% to take account of the improvements required by 2006 building regulations. The applicant should commit to a percentage carbon reduction through the use of energy efficient design measures beyond current Building Regulations.

**Combined heat and power and communal heating network (Be clean)**

79 London Plan policy 4A.6 states that the Mayor will expect all major developments to demonstrate that the proposed heating and cooling systems have been selected in accordance with the hierarchy identified in Policy 4A.6. The energy strategy states that Berkeley Homes has not initially committed to building a site wide heat network; however they will make provision in plant rooms and from residential blocks to allow future connection to a network. An area has also been allocated for a plant room within the ‘Hub’, sized to accommodate a combined heat and power solution should it be required in the future.

80 The applicant has not fully justified the rejection of a site wide strategy. As stated in the pre-application meeting advice report, the outline strategy should set out how a decentralised
energy system will be integrated into the master plan through the phasing of the scheme. The strategy should include a commitment to a single heat network upon completion of the development and details of energy centres (temporary and permanent) and of the scale of combined heat and power plant linked to the likely energy loads. The applicant has not appraised the feasibility of providing heating and cooling systems in accordance with the order of preference set out in London Plan policy 4A.6. Specifically the following should be considered and where these are technically not feasible, robust justification will need to be provided:

**Phase 1:**

81 A single communal heating network supplying all dwellings with the exception of the houses. A single energy centre housing all heat generating plant should supply this communal heating network.

**Phase 2:**

82 A single communal heating network supplying all dwellings with the exception of the houses. A single energy centre housing all heat generating plant should supply this communal heating network.

**Phase 3:**

83 At the end of Phase 3, a district heat network should supply phases 1, 2 and 3 from a consolidated energy centre, which should allow for an increase in the installed plant capacity to also supply subsequent phases (the space provision for this extra capacity should be demonstrated on indicative plans).

84 Combined heat and power should supply the consolidated heat network. The applicant should provide an initial estimation of suitable combined heat and power capacity at the end of Phase 3 and plan for any extra capacity that will be required for subsequent phases. The applicant should provide evidence that initial contact with Energy Service Companies (ESCOs) has been made in order to understand how the scheme could be implemented and the implications of this.

**Subsequent phases**

85 The network established for phases 1, 2 and 3 should then be developed to link the subsequent phases.

86 In summary, the applicant needs to undertake a feasibility analysis of implementing a site wide district-heating scheme in accordance with London Plan policy 4A.6. This should consider supplying the heating requirement of the whole development on a single network unless it can be demonstrated technically not feasible.

**Renewable energy (Be green)**

87 London Plan policy 4A.7 requires development to achieve a reduction in carbon dioxide emissions of 20% from using on site renewable energy generation. The renewable option appraisal should consider the integration of renewable technologies into the single heat network as described above. An estimation of the carbon savings that could be achieved by the proposed solutions should be undertaken to demonstrate compliance with the London Plan.

88 If renewable electricity generation technologies are proposed, the applicant should also estimate the carbon savings that could be achieved by those and provide further information such as squared meters of photovoltaic panels and number of turbines envisaged.
Phase 1

Baseline emissions and energy efficiency (Be lean)

89 As set out above, London Plan policy 4A.3 seeks that boroughs “ensure future development meet the highest standards of sustainable design and construction”. Baseline carbon emissions have been calculated using suitable modeling of representative dwellings to demonstrate compliance with Building Regulations 2006. Total energy has also been accounted for.

90 The applicant estimated that energy efficiency measures proposed for the flats would reduce carbon emissions by 5% beyond Building Regulations requirement, i.e. beyond the Target Emissions Rate. While these energy efficiency measures are welcome, it is considered the scheme has scope for further improvements and further measures should be incorporated to secure larger carbon reductions. The applicant should provide information on the insulation levels and air tightness standards for the flats.

91 The applicant estimated that energy efficiency measures proposed for the houses would reduce carbon emissions by 13% beyond building regulations. The applicant should consider whether by adopting mechanical heat recovery ventilation systems for the houses further carbon reductions could be secured.

Combined heat and Power and community heating (Be clean)

92 London Plan policy 4A.6 states that the Mayor will expect all major developments to demonstrate that the proposed heating and cooling systems have been selected in accordance with the hierarchy identified in Policy 4A.6. The applicant is proposing three separate networks on Phase 1. In accordance with the hierarchy set out in London Plan policy 4A.6, the applicant should consider the opportunities to link into the wider masterplan on a single site wide network. Three separate networks could undermine possible future links into other phases of the masterplan. The applicant has not justified the rejection of a single site wide network for Phase 1.

93 The applicant should consider the opportunities for all dwellings, except the houses within Phase 1, be connected into a single site-wide communal heating network and the energy centre/central plant room should be shown on plans, unless it can be show that this is technically not feasible.

Renewable energy (Be green)

94 London Plan policy 4A.7 requires development to achieve a reduction in carbon dioxide emissions of 20% from using on site renewable energy generation. Three biomass boilers are proposed to supply the three heat networks currently proposed for the flats with solar thermal panels (2.5 sq.m. on each house) supplying some of the hot water requirements of the houses. The total carbon savings from these technologies is estimated at 20%.

95 The solar thermal proposal for the houses is welcomed. The renewable energy strategy for the flats should be compatible with the communal heat network and single energy centre required above.

96 Where the use of biomass is proposed, the biomass boiler must be certified as an exempt appliance in accordance with the Clear Act 1993. A list of exempt appliances can be found at: http://www.uksmokecontrolareas.co.uk/appliances.php
Efforts should be made to ensure the biomass boiler is one of the lowest emitting models available on the Government’s Exempt Appliance list at the time of installation. The following information should also be provided:

- The make, model and thermal capacity of the biomass boiler and details of the additional abatement technology that has been investigated for fitment to reduce air pollution emissions. What reductions in emissions will this produce.
- The type, height and location of the chimney.
- Information on the fuel, fuel feed system, the fuel supply chain and the arrangements that have been investigated to secure fuel.
- A breakdown of emissions factors for NOX, particulates and any other harmful from the biomass boiler.
- An assessment of the impact of the emissions to ground level concentrations and any additional impact to surrounding buildings/structures. It would be most helpful if the results of dispersion modelling were presented on a map.

Climate change

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, contribute to flood risk reductions, including applying sustainable drainage principles, minimise water use and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water.

Overheating (Policy 4A.10)

The passive design measures have not been quantified in technical terms within the energy strategy for the masterplan and commitments to carbon savings beyond current building regulations do not extend beyond Phase 1. Further commitments and technical work is required to ensure consistency with London Plan policy 4A.3 which should cross reference passive design requirements of policy 4A.10.

The passive measures appear to be shown within the design and access statement in terms of the layouts proposed, including the use of double and multi aspect apartments. The provision of houses across the masterplan will provide a significant proportion of units with cross ventilation options which is supported. This design work is not clearly reflected in the energy strategy and therefore further technical work is required as set out in the energy comments, in particular commitments to energy efficiency savings as part of the masterplan.

Living roofs and walls (Policy 4A.11)

The masterplan and Phase 1 includes a mix of green and brown roofs consistent with London Plan policy 4A.11.

Flooding (4A.12), sustainable drainage (4A.14) water use (4A.16)

A Flood Risk Assessment has been submitted with the application. The site is shown as partially within Flood Zone 2 and yet the Environment Agency records show that a substantial part of the site flooded in 1968. It is understood that the Environment Agency has requested additional modelling information to clarify the flood risk at the site. Given this the Mayor remains to be convinced that the part of the site that has experienced flooding is suitable for residential re-development. If the applicant can satisfy the EA that the site is not within flood zone 3, then he
will be content that residential development is appropriate on flood risk grounds in accordance with PPS25.

103 The development is proposing to incorporate SUDS techniques to reduce the run-off from the redevelopment to greenfield rates. This is an appropriate drainage approach to this site and is supported as being in line with London Plan Policy 4A.14. These provisions should be secured by planning condition or section 106 agreement.

104 Policy 4A.16 sets a maximum water use target of 105 litres per person per day for residential dwellings. The applicant should make a clear commitment to meeting this policy requirement, which should be secured by condition by Greenwich Council.

**Transport**

105 TfL are part landowners of the proposed development site. Consequently these transport comments have been prepared by the GLA Transport Team.

106 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 from TfL for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

**Car Parking & Site Access**

107 A car parking ratio of 0.6 spaces per flat and 1 space per house has been proposed across the masterplan site. This level of provision is in accordance with the London Plan standards and is therefore considered acceptable. Given that the Hub area records a public transport accessibility level of 3, which is the most accessible part across the whole site, car parking provision for the commercial aspects of the development is considered excessive and in some instances, well in excess of standards proposed in Annexe 4 of London Plan. This is not acceptable and commercial parking levels should therefore be reduced accordingly. Car parking for Phase 1 of the development is being proposed at a ratio of 0.67 spaces per unit, which is in accordance with both the London Plan standards and the proposals for the masterplan site as a whole.

108 The introduction of a Controlled Parking Zone (CPZ) should be investigated by the applicant, as it is considered to be necessary to enforce the low residential parking ratio. Details of how the parking spaces will also be managed on site, information on how parking spaces will be allocated and how overspill and footway parking will be controlled, should also be addressed. In line with London Plan policy 3C.23 (*Parking Strategy*), these proposals should be formalised in a Car Parking Management plan which should be secured by condition.

109 While it is proposed to signalise a number of junctions as part of the redevelopment, little information on the site access proposals has been provided within the Transport Assessment; although it is noted that further information will be submitted as part of detailed applications for the subsequent phases of the development, given the strategic nature of Kidbrooke Park Road and in accordance with the London Plan policy 3C.16 (*Road scheme proposals*), assurance should still be provided at this outline stage to confirm the acceptability of the junction alterations.

110 As such, scale drawings showing signal arrangements and lane markings should be provided to allow meaningful comments to be made on the modelling assessment. Whilst straight across pedestrian crossings would be preferred at these junctions wherever possible, swept paths should also be used to demonstrate that the proposed new junction arrangements can satisfactorily accommodate all vehicles, and any potential adverse impacts arising from these proposals would be
expected to be fully addressed. Clarification on whether the existing width restrictions and weight limit on Kidbrooke Park Road are to be retained should also be provided.

111 As vehicles are likely to use Meadowside to access Phase 1 of the development, significant changes to the highway are likely to be required in order to accommodate the proposed levels of traffic and improve the current narrow carriageway width and poor pedestrian facilities at this location. Whilst this will be expected to be delivered through a section 278 agreement, additional information is required on any proposed changes to the highway network arising from this phase of the development.

Trip Generation & Highway Impact

112 Whilst the methodology applied for dividing residential trips by journey purpose is acceptable, discrepancies have however been identified on the split presented in the report compared to that provided in the scoping study. Comparison with Journey to Work census and National Travel Survey data should also be submitted to ensure robustness in the methodology. With respect to the commercial trip generation, confirmation of whether or not office development is proposed as part of the overall masterplan is required, as currently it is included within the trip generation figures but omitted from land uses presented within the transport assessment.

113 Very little justification has been given for the traffic distribution assumptions and as such, further information is required before these assumptions can be considered acceptable. Alongside this, growth from the March 2008 baseline to the opening year has not been factored in any of the impact assessment. A growth factor using NRTF and TEMPRO should therefore be considered, or a justification for applying zero growth be provided. Given the retail and leisure uses on site, a weekend assessment should also be submitted.

114 It is stated that assessment will only be carried out at junctions where the impact is greater than 5%. However, in accordance with the London Plan policy 3C.17 (Tackling congestion and reducing traffic) a corridor approach should instead be adopted including the modelling of all proposals along Kidbrooke Park Road between the A2 and the A20, as well as the impact at the Yorkshire Grey roundabout. The impact on Clifton and Sun-in-the-Sands roundabouts should also be considered, with all modelling to be calibrated and validated to TfL’s Department of Traffic Operations (DTO) standards. Should any models show that the development will result in capacity issues on the TLRN, further discussion will be required as to the acceptability of any impacts.

Pedestrians & Cycles

115 The proposal to provide ‘green fingers’ emanating from the central ‘Hub’ and providing direct, well positioned routes, which will conveniently serve pedestrians and cyclists, is supported. This will help to provide a high level of pedestrian and cycle connectivity, both throughout the masterplan area and beyond. The provision of signalised pedestrian and cycle crossings at the key junctions along Kidbrooke Park Road is also supported, as is additional informal crossing points at other key points along the road. These should however be made fully accessible to pedestrians with disabilities through compliance with BV165 standards and by providing dropped kerbs, tactile paving and rotating cones. However, at this stage no assessment has been made as to whether these crossings will adversely affect highway capacity, and assurance is sought on this.

116 While the proposal to develop the internal site roads by providing safe pedestrian and cyclist conditions, within a well designed low vehicular speed environment, is supported in principle, it should however be noted that shared surfaces should still require some form of delineation to prevent pedestrians, particularly the visually impaired, from potentially conflicting with vehicles. This should be in accordance with TfL’s Streetscape Guidance.
117 The provision of at least one secure and covered cycle parking space for each residential unit throughout the masterplan area is in accordance with TfL’s cycle guidance and therefore supported. Cycle parking for the commercial aspects of the development is also proposed to meet the minimum standards, which is also welcomed. Whilst the integration of visitor cycle stands into the landscaping of the site is supported, it is however expected that facilities should be overlooked and positioned so as not to impede on pedestrian safety.

118 With regards to Phase 1 of the development, it is noted that Meadowside has a footway less than 2 metres wide on one side of the road, which is currently in poor condition and suffering from footway parking and infrequent street lighting. Pedestrian improvements, to be secured by condition, will therefore be sought in this location as part of the Phase 1 proposals, in order to provide a safe and welcoming pedestrian environment. Immediate connection from Phase 1 into the cycle route on Eltham Road, along with access to the traffic free routes, improved lighting and Phase 1 active frontages, which will improve the safety and security of pedestrians within Sutcliffe Park, are all supported.

Public Transport

119 Additional information is required before the impact of the development on the bus network can be fully assessed. At present, it remains unclear how it has been concluded that the masterplan, which involves an uplift of 2,100 units across the whole development site, along with additional commercial uses will generate an insignificant increase in bus trips during peak hours. Whilst this needs to be addressed, it is also unclear whether non residential trips have also been included within this assessment and how these are likely to impact the network over the phased lifetime of the development. More information is also required on the methodology used to break down the walking and public transport trips.

120 In order to inform the likely impact of the proposals on the bus network, trips have been assigned across the same five bus routes, as for Phase 1 of the development. However, this is not considered appropriate as it is understood that the bulk of residents will be situated to the northern end of the site and as such routes on Eltham Road will not necessarily be as attractive, with the distribution of trips around the site therefore expected to focus on the Routes 178 and B16. Capacity enhancements will therefore be sought to adequately accommodate the forecast increase in bus demand resulting from the development site. In light of the proposals, an initial TfL assessment has identified that potential improvements are likely to consist of: i) frequency increase for the 178; ii) frequency increase for the B16; iii) diversion of the 321. It should be noted that this is only an initial assessment, and bus trip generation figures and trip distribution need to be robustly and accurately considered, in order to identify the exact changes to bus services that are required.

121 Further discussions on this matter is therefore required and in accordance with the London Plan policy 3C.20 (Improving conditions for buses) an approximate section 106 figure of £3 million per annum over 3 years for these improvements (£920,000 each for the 178, B16 and £1.15m for the 321), [if proved to be necessary as a result of this planning application], will be sought.

122 It is also acknowledged that at present, the routing of the B16 and 178 is circuitous, but necessary, due to the current layout of the estate. As a result, TfL has advised that it will be willing to review this, subject to ensuring that the vast majority of residents will still be within 400 metres radius of a bus stop, and that accesses and links to Kidbrooke Park Road will be improved at full cost to the developer.

123 It is proposed that new regularly spaced bus stops will be located to integrate with the improved pedestrian crossing facilities, and while any new bus stops will require TfL’s approval, all existing facilities should still be upgraded to full accessible standards, in order to comply with DDA
requirements. The upgrades should be carried out in accordance with current TfL guidance and the cost of these fully funded by the developer and secured by condition or section 106. In the absence of any existing bus stop audit, a capped contribution towards these works will be sought at a level of £20,000 per pair of stops. Alongside this, given the intention to signalise various junctions as part of the site redevelopment, including the junction of Kidbrooke Park Road with Tudway and Weigall respectively, bus priority measures will be required to be put in place as part of these works so as to reduce the delay to buses.

124 The possible relocation of the current bus stand will need to be agreed with TfL. In line with London Plan policy 3C.4 (*Land for Transport*), if the bus stand is to be relocated, it will need to provide an improved interchange, be located in an appropriate location to the surrounding land uses and provide at least the same level of stops and standing room, if not more, based on the possibility of increased demand, as at present. Alongside this, evidence and discussion will be needed to ensure that the stand meets TfL’s operational requirements, including the provision of driver facilities, such as toilets. The full cost of relocating this facility will also need to be borne by the developer and should be further defined once an assessment of existing and future required services has been undertaken.

125 The proposals to improve rail Kidbrooke station and interchange with buses, in line with the ‘Kidbrooke Station Capacity Study Draft Report’ from Network Rail (NR), are supported. Further, the provision of a new Transport Interchange Hub, with new bus station, is supported. It is expected that the suggested improvements will be delivered as part of the masterplan application and should therefore be secured through the section 106 agreement, along with ensuring that the station and services have sufficient capacity to cope with the additional demand. It is noted that the current rail station has step free access, and therefore any new station will be required to be in as good, if not better location, in terms of access by all modes, as the current one. Guidance on the standard of facilities to be provided at new stations should be adhered to; the provision of attractive and defined walking routes to the station is welcomed. It is understood that operational land will still be required by Network Rail to ensure adequate and safe operations of rail services at the station. As such, to comply with London Plan policies 3C.4 (*Land for Transport*) and 3C.8 (*Improving Strategic Rail Services*), this will need to be addressed through the masterplan design proposals of the site and secured through land safeguarding as part of the section 106 agreement.

126 A section of TfL land is currently the subject of a Compulsory Purchase Order (CPO) made by Greenwich Council as part of these redevelopment proposals. However, TfL do not consider this land to be necessary for the regeneration of the area in line with the adopted SPD, and has asked Greenwich Council to enter into further negotiations on this matter.

**Travel Plan**

127 In accordance with the London Plan policy 3C.2 (*Matching development to transport capacity*), this re-development requires a framework travel plan to be submitted as at present only a residential travel plan has been produced. With regards to the submitted travel plan however, the objectives appear vague and none are site specific and separate objectives need to be identified for the residential and workplace element of the development.

128 The target identified for modal split is not considered appropriate, as the figure is currently a projection, based on a forecast number of journeys, whereas the figure should be lower to achieve modal split. Apart from a reduction in car use, no other targets have been identified, which is not acceptable. With regards to management, it is welcomed that a travel plan coordinator will be in place prior to occupation on site, although it is suggested that one week prior to opening the sales and marketing suite isn’t early enough.
Both the marketing strategy and the measures section appear thorough and appropriate for the residential component of the site, whilst the monitoring measures appear to be in line with TfL’s guidance documents. It should be noted that developers must ensure that the initial travel survey takes place after six months or 75% occupation, depending on which comes first.

**Freight & Servicing**

Very little information on servicing and deliveries has been provided within the transport assessment, and whilst it is acknowledged that this information may follow as part of detailed applications for subsequent phases of the development, an overall servicing strategy to be agreed at the outline stage is still expected. As previously stated, the development of Delivery and Servicing Plans (DSP), as supported by the London Plan 3C.25 (Freight strategy) identifying the likely impacts of goods distribution, and measures to mitigate those, is strongly encouraged.

In addition, while the developer has carried out an assessment of the impact of construction traffic on the local highway network, no information on the timescales and phasing of the development has been provided. Any measures to minimise impact on the highway is therefore requested to be formalised in a Construction Management Plan (CMP). This is considered particularly important given the vehicle weight limits on Kidbrooke Park Road. It is also advised that during construction and whilst the development is operational, the developer should be committed to procuring materials from environmentally sustainable firms, such as those that can demonstrate willingness to adopt sustainable measures in logistics by being a member of TfL’s Freight Operator Recognition Scheme (FORS).

**Summary**

In conclusion, additional information, as detailed above, particularly regarding the impact of the development on the highway and public transport network, and subsequent adequate mitigation measures, are required before the application can be supported on transport grounds, and be considered in general conformity with the London Plan policies 3C.2, 3C.4, 3C.8, 3C.16, 3C.17, 3C.20, 3C.23 and 3C.25

**London Development Agency’s comments**

The LDA support the principle of redevelopment of the Ferrier Estate and the creation of a sustainable mixed use neighbourhood at this location. The redevelopment of the Ferrier Estate meets the strategic aspirations of the London Plan by providing substantial new homes set within a mixed use community which will significantly contribute to the regeneration of this area.

Within the site, the LDA welcomes that 5,450 sq.m. of B1 office floorspace that is proposed. In accordance with London Plan Policy 3B.2 ‘Office demand and supply’ which seeks the provision of a variety of type, size and cost office premises to meet the needs of all sectors, including small and medium size enterprises, the LDA requests that consideration is given to providing a proportion of office accommodation that is suitable for small or start up businesses.

London Plan Policy 3D.7 ‘Visitor accommodation and facilities’ seeks to improve the quality, quantity and variety of visitor accommodation. This policy seeks an additional 40,000 new hotel rooms by 2026 in the capital, and new facilities are encouraged to be built in non-traditional place such as Opportunity Areas and town centres with good public transport accessibility. The proposal for a 170 bedroom hotel will significantly contribute towards providing additional visitor accommodation stock in Kidbrooke in order to meet the demand for hotel rooms within the Borough and the wider South East Sub Region.
London Plan Policy 3D.7 also encourages the development of hotels that are fully wheelchair accessible. The Hotel Demand Study (June 2006), undertaken by the GLA looked at the supply of wheelchair accessible hotel accommodation in London, identifying that there was a scarcity, and that the 2012 Olympic and Paralympics Games will require a much greater stock of accessible accommodation. In support of this, the LDA’s Tourism Action Plan 2006-2009 endorses a vision for London that is more accessible for everyone. Given the scarcity of accessible accommodation, the number of accessible rooms that have been designed for people with disabilities should be maximised within this proposal.

The applicant is also encouraged to provide staff accommodation as part of the hotel development as set out in paragraph 3.294 of the London Plan to alleviate the labour market constraints facing the hospitality industry, to enhance the general appeal for potential workers and to address the need for affordable housing.

Given the scale of the development, Greenwich Council should seek to ensure that local residents and business benefit from the development during the construction and operational phases. The applicant has stated that 287 jobs providing local employment within Kidbrooke will be created as a result of the office accommodation provided within the proposal. In addition to this, the new hotel will also provide a significant number of jobs with the hospitality sector.

In accordance with London Plan Policy 3B.11 ‘Improving employment opportunities for Londoners’, the applicant should 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. Initiatives to create training and employment opportunities and to utilise the goods and service of small and medium size enterprises and local business should be formalised by condition and/or through a section 106 agreement between the applicant and Greenwich Council. Further details of how this proposal will comply with London Plan Policies 3B.11 should be submitted and agreed with the LB Greenwich prior to the application being referred back to the Mayor at Stage 2.

Local planning authority’s position

The application is due to be considered by the Council in January 2009. The officer recommendation is currently unknown.

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, housing mix, affordable housing split, density, housing viability, design and access, children’s play space, energy and climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- Affordable housing, housing mix, affordable housing split, density and viability (non-compliant): Insufficient information has been provided regarding the loss of affordable housing, housing mix, density and the financial viability of the proposed housing offer.
- Design and access (non-compliant): Further work is required regarding the location of the extra care units and the primary school. Further work is also required regarding the creation of an inclusive environment and layout arrangements to detailed blocks within Phase 1.
- Children’s play space (compliant): The proposals will provide significant open space and play space opportunities across the masterplan area.
- Energy (non-compliant): No commitment to energy efficiency measures beyond Phase 1, and no site wide energy infrastructure or integrated energy strategy across the masterplan.
- Climate change (non-compliant): Insufficient consideration regarding energy efficient design beyond Phase 1. Commitment to minimum water use targets is required.
- Transport (non-compliant): The proposals are non-compliant regarding a number of transport areas set out in the main body of the report (Paragraph 105 – 132). Further discussion is also required regarding the transport contributions being sought through the section 106 agreement.

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:

- Affordable housing: Further information regarding the existing breakdown of units and proposed units in terms of habitable rooms. Submission of viability work (subject to detailed scrutiny) to support the proposed approach, options for a review mechanism and further detail justification regarding the proposed affordable housing split and regarding the merits of the extra care housing product.
- Design and access: Design work regarding the appropriateness of the location of the school and extra care units. Further work is required regarding access from the central open space to the central courtyards of the ‘C’ blocks and the interface on both the east and west elevations of the linear blocks.
- Energy: Commitment to energy efficient design measures beyond Phase 1. Commitment to site wide energy infrastructure, with appropriate phasing plan and renewable package.
- Climate Change: Further technical work regarding energy efficient design and commitment to water use targets.
- Transport: The report provides comprehensive details of the appropriate remedies to the outstanding transport matters including further discussion required regarding the section 106 agreement (Paragraph 105 – 132).