<table>
<thead>
<tr>
<th><strong>Strategic planning application stage II referral (new powers)</strong></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th><strong>The proposal</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition of all except the saw-tooth roof building fronting the site and the construction of a university technical college, including a new three-storey building fronting Woolwich Road; renovation of the retained building and the provision of two multi-use games areas, floodlighting, car parking, associated landscaping and access arrangements. <strong>(Departure from the development plan)</strong>.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>The applicant</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The applicant is the <strong>Royal Borough of Greenwich</strong> and the architects are <strong>Walters &amp; Cohen</strong>.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Strategic issues</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The issues for consideration at this stage are: <strong>inclusive design and access; transport, energy</strong> and <strong>flood risk</strong>.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>The Council’s decision</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>In this instance Greenwich Council has resolved to <strong>grant permission</strong>.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Recommendation</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>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 or direct that he is to be the local planning authority.</td>
</tr>
</tbody>
</table>

**Context**

1. On 14 May 2012, 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 3E of the Schedule to the Order 2008: “Development—(a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within the following class in the Use Classes Order—(xi) class D1 (non-residential institutions).”
On 20 June 2012 the Mayor considered planning report PDU/2971/01, and subsequently advised Greenwich Council that the application did not comply with the London Plan, for the reasons set out in paragraph 105 of the above-mentioned report; but that the potential remedies set out in paragraph 107 of that report could address those deficiencies.

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 12 July 2012, the Planning Board of Greenwich Council unanimously resolved to grant planning permission for the revised application, and on 13 July 2012, 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 Greenwich Council under Article 6 to refuse the application. The Mayor has until 26 July 2012 to notify the Council of his decision and to issue any direction.

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

Update

At the consultation stage, Greenwich Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 105 of the above-mentioned report; but that the potential remedies set out in paragraph 107 of the report could address those deficiencies:

Inclusive design and access

In the previous report, officers highlighted concern over the non-compliance with the requirements of policy 7.2 (An Inclusive Environment) of the London Plan, namely: the use of an external platform lift at the principal entrance of the building coupled with the lack of an alternative access arrangement in the event of the internal lift breaking down; and inadequate information on access provisions at the rear of the subject buildings.

In response to this, a set of revised plans were submitted to the GLA on 18 July 2012, which illustrate a full passenger lift to serve all three storeys of the proposed college building. It is the minimum size acceptable (under British Standard B300:2009 and Approved Document M of the Building Regulations) and a larger one would have been preferable, to allow a wider variety of people to use it. Although it fulfils the ‘essential’ requirements of policy, it does not achieve ‘best practice’ in meeting the principles of inclusive design’. Nonetheless, it represents a very significant improvement over the platform lift originally proposed and is therefore acceptable.

The ramp arrangements up to the proposed principal entrance have also been designed to accord with the minimum design standards (British Standard BS8300:2009 or Approved Document M). The proposed landings are now large enough for a wheelchair user to turn on. Whilst it is not ideal for wheelchair users to negotiate tactile paving, such paving is necessary on the approach to steps, and some features inherent in the design of the scheme make this conflict is unavoidable. The applicant is, however, advised that the steps should incorporate the correct ‘contrast nosings’ in accordance with BS8300:2009+A1:2010.

In essence, the revised plans resolve the crux of earlier concerns over the provisions for disabled users and visitors, and are therefore, acceptable.

Transport for London’s comments
At Stage 1, TfL requested clarification and verification of some of the technical information provided in the applicant’s transport statement and indicated a series of financial contributions towards the implementation of relevant transport improvements before it can confirm that the proposal is fully compliant with the transport policies of the London Plan.

TfL also acknowledges that the technical education being provided will benefit the operation of the transport system in London, including the London Underground. TfL consider that the local transport system could accommodate this development subject to measures outlined below.

It is proposed and required by condition that applicant monitors development impact on local bus services and on Woolwich Road and mitigates impact through travel management measures. Other associated measures such as the requirement for a Travel Plan, car park management plan, Delivery and Service Plan, loading and unloading restrictions and car parking provision for disabled people will aid this approach.

TfL was provided with further information on trip generation and mode of travel. As the UTC is a new concept in educational terms; TfL accept that the future catchment is difficult to ascertain and is unable to assess which bus services will be used.

An audit of local bus stops against TfL Bus Stop Accessibility Guidance (January 2006) has been provided. The developer’s consultant prepared Pedestrian Environmental Review System (PERS) audit of local routes to nearby bus stops, Charlton and Woolwich Dockyard train stations and the development of a way-finding strategy is required by condition.

TfL raised concerned over the potential impact on the Mayor’s Cycle SuperHighway proposals. Measures on Woolwich Road to monitor the UTC impact on Woolwich Road should help safeguard the implementation of these proposals.

A Travel Plan has been secured by condition to safeguard residential amenity, pedestrian and road safety. Details of Cycle Parking are subject to a condition and should be in line with London Plan standards. Details on pedestrian route from the disabled car park on site to the entrance are subject to condition.

Energy

The initial report also flagged up concern that submitted energy strategy had not confirmed that the proposed college buildings would be connected and supplied from a single energy centre, nor the location and size of the proposed energy centre. The strategy also lacked the necessary evidence to enable the GLA energy advisors verify the relatively high reduction/savings in the regulated emission of carbon dioxide per year.

In response, the applicant has submitted a Building Regulations UK Part L (BRUKL) output document to provide the target emissions rate (TER) baseline. This is now acceptable.

The location and sizing (no dimensions given, but approximate size can be scaled off the plans) of the energy centre are shown on a drawing provided by the applicant. This is now acceptable.

The applicant was also requested to confirm in writing that all building uses would be connected by a site-wide heat network served by the single energy centre; and to clarify the response on solar photo-voltaic (PV) panels by providing a projected reduction in regulated CO2 emissions in tonnes per annum for the chosen array- a 19.27 kilo watt peak (kWp).

Confirmation has just been received in response to the former, and for the latter the applicant has indicated that the 19.27 kWp PV array is expected to produce in excess of 7.3 tonnes
of carbon dioxide (CO2) per year. This will equate to a reduction of 22% on the buildings regulated CO2 emissions.

22 It is also confirmed in writing that the energy centre would be equipped with the means to facilitate connection of the college to an area district heating scheme, should one be made available in the future.

23 With the submission of this information, the outstanding energy concerns have been resolved.

**Flood risk**

24 A flood risk assessment submitted in respect of the site indicated the need for a detailed and robust emergency evacuation strategy to be put in place, to fulfil the requirement London Plan policy 5.12C(b). It was, however, subsequently agreed that the objective of this could reasonably be achieved by the use of an appropriately-worded planning condition.

25 Accordingly, condition 28 of the Council’s draft decision notice provides that:

- “Prior to the occupation of the development, an emergency flood plan shall be submitted to and approved in writing by the local planning authority. The emergency flood plan should set out provisions for safe access/egress routes in the event of an extreme flood event and procedures for the University Technical College to sign up to the Environment Agency’s flood warning service.”

  **Reason:** To minimize the risk of flooding to users of the building and to comply with policy E18 of the Unitary Development Plan 2006.

26 The condition resolves the outstanding concern and is fully compliant with the objective of the London Plan policy on this matter.

**Response to consultation**

27 The application was advertised by press and site notices, and by consultation letters to 244 neighbouring occupiers within the vicinity of the site. The responses received can be summarised as follows:

**Greenwich Conservation Group**

28 Greenwich Conservation Group had no objection to the principle of this development, but it commented on or raised a few questions on matters of detail. The Group welcomed the retention of the saw-tooth roofed building and its conversion to workshop/studio use. It also welcomed the proposal to open the facility to the wider public in the evenings and at weekends, although it questioned if sufficient car and cycle parking spaces would be available to meet the demand.

29 The Group observed that the change of use from an industrial to an educational use represented a departure from the development plan but did not object, given that the site was allocated in the Charlton Riverside Masterplan for educational purposes. However, it questioned the provisions made to relocate the two operations that currently subsisted on the site.

30 These issues were addressed as part of the officer report to the Council’s Planning Board.

**Environment Agency**
The Environment Agency noted that the development would only meet the requirements of the National Planning Policy Framework (NPPF), if any permission included the set of conditions and informatives, which the agency had drafted for the benefit of Greenwich Council.

Port of London Authority

The PLA raised no objection to the proposed development.

Thames Water

Thames Water provided some advisory comments for the benefit of the developer, subject to which it had no objection to the proposed scheme.

Suitable conditions and informatives are proposed to deal with Thames Water’s comments.

London Fire and Emergency Planning Authority

The LFEPA requested copies of the site plan to be deposited with its Water Team and compliance with the requirements of B5 of Approved Document B.

These were addressed by the use of informatives.

Sport England

Sport England considered that this was a non-statutory planning application, as the site was not a playing field, as defined by the Town and Country Planning (Development Management Procedure) Order 2010. Nonetheless, it strongly supported the principle of the development and recommended that the detailed design of the multi-use games area should accord with the relevant Sport England design guidance, in order to ensure that the facility was of an appropriate quality and fit for purpose.

The Council has relayed those comments to the applicant and proposed conditions in respect of the multi-use games area.

English Heritage

English Heritage advised that the application be determined in accordance with national and local policy guidance, and on the basis of specialist conservation advice. It did not consider that the development would have a discernible effect upon archaeology, so it recommended that any pre- or post-determination requirement for archaeological consideration of the site could be waived.

Design Council of the Commission for Architecture and the Built Environment (CABE)

CABE regrets that it was unable to review the proposed scheme due to lack of adequate resources.

Natural England

Natural England indicated that it had issued standing advice for protected species, which was a material consideration in determining the proposed development. It noted that the protected species survey had identified that bats, a European protected species, may be affected by the development. It therefore referred the Council’s officers to the Natural England Standing Advice Sheet: Bats, which advises on how to decide if there is a reasonable likelihood on bats being present, and the associated survey and mitigation requirements.
42. It however advised, that further survey work was required in accordance with ‘Bat Surveys: good practice guidelines’ and that officers should request additional information from the applicant.

43. Natural England confirmed that it had not assessed the survey for badgers, barn owls and breeding birds; water voles, widespread reptiles, or white-clawed crayfish; all of which are protected by domestic legislation and suggested that the Council’s officers use Natural England’s standing advice to assess the potential impact on those species.

44. In response to these issues, officers affirmed that the applicant had supplied a bat survey (Bat Inspection Report updated in May 2012) which recorded no activity. Light spill from neighbouring flood-lit buildings and floodlights from the central courtyard of the buildings on site reduced to negligible any potential for and that no further activity surveys were required.

**Legal considerations**

45. 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. 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**

46. Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (‘Costs Awards in Appeals and Other Planning Proceedings’) emphasises that parties usually pay their own expenses arising from an appeal.

47. 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**

48. The proposal represents a departure from the London Plan designation of the site and adjoining land as a strategic industrial location and is, in principle, contrary to policy 2.17 (Strategic Industrial Locations), which states that development proposals in SILs should be refused unless they meet specified criteria. The GLA has actually raised a non-conformity objection to the Charlton Riverside masterplan allocation of the site and its surrounding area for alternative uses.

49. In this instance, however, given the strong strategic support for the development of education facilities for Londoners and a proposal for a primary school in place of a current educational use on the adjoining site, it is considered that the level of SIL release proposed is acceptable and pragmatic.

50. Furthermore, the establishment of a technical college in close proximity to industrial and other commercial businesses would create opportunities for mutually beneficial links between each other. Students could gain practical experience by training in nearby businesses premises,
experienced local workers could offer practical training as visiting mentors to the college; and local businesses could send their staff for continuing professional development at the proposed college.

For these reasons, the establishment of a university technical college in that location is acceptable in strategic planning terms.

for further information, contact Planning Decisions Unit:

Colin Wilson, Senior Manager – Planning Decisions  
020 7983 4783   email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)  
020 7983 4895   email justin.carr@london.gov.uk

David Blankson-Hemans, Senior Strategic Planner- Case Officer  
020 7983 4268   email david.blankson-hemans@london.gov.uk
# University Technical College, New Charlton

in the Royal Borough of Greenwich

planning application no. 12/1024/F

## Strategic planning application stage 1 referral


## The proposal

Demolition of all except the saw-tooth roof building fronting the site and the construction of a university technical college, including a new three-storey building fronting Woolwich Road; renovation of the retained building and the provision of two multi-use games areas, floodlighting, car parking, associated landscaping and access arrangements. *(Departure from the development plan)*.

## The applicant

The applicant is the **Royal Borough of Greenwich** and the architects are **Walters & Cohen**.

## Strategic issues

The key issues to consider are the **employment** implications of a change of use of land in a **strategic industrial location**; the national, regional and local priority accorded to education; the **urban design** and architectural merits of the development; **inclusive design** and **access**; the **transport** implications, its **energy** provisions and compliance with the principles of **sustainable design & construction**.

## Recommendation

That Greenwich Council be advised that, on balance, while the application proposal is acceptable in strategic planning terms, it does not fully comply with the London Plan for the reasons set out in paragraph 105 of this report; the potential remedies set out in paragraph 107 could, however, address those deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

## Context

1. On 14 May 2012, 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 22 June 2012 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.

2 The application is referable under Category 3E of the Schedule to the Order 2008: “Development—(a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within the following class in the Use Classes Order—(xi) class D1 (non-residential institutions).”

3 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, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

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

**Site description**

5 The roughly rectangular site is approximately 1.16 hectares in size and situated on the north side of the A206 Woolwich Road, between the Greenwich Peninsula to the west and Woolwich to the east, in an area known as New Charlton. It is approximately 325 metres south of the River Thames, slightly south-east of the Thames Flood Barrier.

6 The site lies to the immediate south of Westfield Street, off which Ferranti Close provides vehicular access along the north section of its eastern boundary; the south section of that boundary abuts the three/four-storey red and brown brick Victorian buildings of Holborn College—an undergraduate and post-graduate educational institution specialising in law and finance, which Greenwich Council has now acquired for conversion into a primary school. The western boundary is separated from Eastmoor Street by Hardens Manorway Park, a narrow strip of greenery and public open space.

7 Woolwich Road is part of the Strategic Road Network and major bus corridor. The site has a moderate public transport accessibility level of 3; where 6 is the highest and 1 is the lowest level.

![Figure 1: Aerial view/site location map. (Source: Walters & Cohen Design and Access Statement; ©April, 2012)](image-url)
The site forms part of the Westminster Industrial Estate and presently consists of low-rise workshop and warehouse buildings, some of which date back to the 1950s. The existing structures include a former skills centre (Block A, close to the northern boundary), a former training centre (Block F, attached to the western end of the saw–tooth roof warehouse fronting Woolwich Road) and a former toy library (Block D, situated north of Block F). The saw–tooth roofed warehouse (Blocks E and J) would be retained and renovated as part of the proposed college accommodation. Only two of the units on site remain occupied; one by a packaging and distribution firm, and the other by the Greenwich Toy and Leisure Library Association for children with special needs.

The surrounding area is characterised by commercial and residential uses, with extensive areas of public open space. The buildings to the north comprise mostly steel-framed warehouses clad in brick and corrugated sheet metal, typical of light-industrial/commercial units. To the south of Woolwich Road is Maryon Park, an urban public park of nature conservation value, with residential properties to its east and west.

Details of the proposal

University technical colleges are a relatively new initiative, sponsored by universities and supported by Central Government and businesses, to offer high quality specialist technical education to 14-19 year-old students as an alternative to the traditional, predominantly academic, mainstream secondary curriculum.

The proposed Greenwich UTC would cater for 600 students (with 300 places for GCSE years 10-11 and 300 places for years 12-13) specialising in engineering and construction, with a particular focus on transport and sustainable technology alongside the traditional core subjects of English, mathematics, science, and information technology. Like other UTCs the curricula would be employer-led. The college would be supported by approximately 60 staff and is intended to broaden the career choice and long-term employability of students by introducing them to a professional environment, and equipping them with skills that lead to an apprenticeship, further education or employment.
The college development would compromise the demolition of all except the saw-tooth roofed warehouse (Blocks E and J) fronting Woolwich Road, which would be retained; and the erection of a three-storey building to fill the void between its flank elevation and the western boundary of the site.

The saw-tooth roofed building would be renovated to provide 2,700 sq.m. (gross internal) floor space to accommodate fitness, science, plant, changing and kitchen facilities; art and graphics, plus house all the spaces required for the teaching of construction and engineering. The new building would provide an additional 2,684 sq.m. of studios, a dining hall, classrooms and administration space; with learning resource, business and apprentice centres- bringing the total amount of college accommodation to 5,384 sq.m.

The northern portion of the site would be laid out to provide sheltered outdoor workshops and two multi-use games areas; with car parking, servicing and delivery space, all surrounded by landscaped areas.

Case history

The site has no planning history relevant to the current proposal.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Employment: London Plan; Industrial Capacity SPG; draft Land for Industry and Transport SPG
- Education: London Plan
- Urban design: London Plan
- Transport/parking: London Plan; the Mayor’s Transport Strategy; Land for Transport Functions SPG, draft Early Minor Alteration to the London Plan;
- Access: London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Sustainable development: London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the saved policies of the 2006 Greenwich Unitary Development Plan and the 2011 London Plan.

The following are material planning considerations:

- The Charlton Riverside Masterplan SPD (April 2012).
- The Revised Early Minor Alteration to the London Plan (June 2012 consultation document).
Land use policy and the loss of industrial land

19 From a strategic perspective, the application site is within an extensive area of industrial estates on the north side of Woolwich Road and by virtue of its long historical use as such, the area is designated in the London Plan as a Strategic Industrial Location (SIL).

20 London Plan policy 2.17 affirms the Mayor’s commitment to encourage borough councils and other stakeholders to promote, manage and protect SILs as London’s main reservoir of industrial and related capacity, including general and light industrial uses, logistics, waste management and some transport-related functions. In broad terms, the policy states a presumption against development proposals in SILs unless they fulfil one or more of four specified criteria. The latter includes proposals that are part of a strategically coordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document (DPD) and those to provide small scale ‘walk to’ services for industrial occupiers. Within that context, paragraph 22 of the National Planning Policy Framework states that the long term protection of such sites should be avoided where there is no reasonable prospect of the site being used for that purpose (paragraph 22).

21 In terms of potential transfers of SIL land to other uses, Map 4.1 of the London Plan places the application site within the ‘limited transfer’ category, wherein policy 4.4 promotes a moderate release of industrial land, adopting an intermediate approach between the rigorous but flexible stance recommended on sites in the ‘managed transfer’ category and the more protective stance recommended on sites in the ‘restricted transfer’ category.

22 The site is also forms part of a 176-hectare area identified in the London Plan as the Charlton Riverside Opportunity Area. The designation makes it one of London’s principal brownfield opportunities to accommodate the kind of large-scale developments that would generate substantial new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land assisted by good public transport accessibility.

23 From a local perspective, the site is identified on the proposals map of the Greenwich UDP as a Defined Industrial Area, to which policies J1 is applicable. These policies looks to protect uses within classes B1 (light industrial), B2 (general industrial) and B8 (storage and distribution). Other uses will not be permitted unless they are ‘sui generis’ activities that are industrial in character or provide a service to local businesses and employees within walking distance. UDP policy J3 relates specifically to the Charlton Business Park, where permission would be granted for uses within class B1 (excluding non-ancillary offices) and B8.

24 Although the Draft Greenwich Core Strategy with Development Management Policies has not been adopted, it has been the subject of extensive public consultation and is due for submission to the Secretary of State later on this year. Its evidence base is more up-to-date than the 2006 UDP and more accurately reflective of the emerging policy direction of Greenwich Council. It therefore carries significant weight, although the GLA has objected to the designation of land in a strategic industrial location into a mixed-use urban quarter in the Charlton Riverside area. Further comments on this are provided in subsequent paragraphs of this report.

25 Policies EA1 and EA 2 of the emerging Core Strategy allocate the land at Charlton Riverside as a Strategic Development Location and key regeneration area. The policies propose a new urban quarter at Charlton Riverside and an intensification of use of existing industrial land. The strategy acknowledges that parts of the present industrial land are made up of low-density industrial units, many of which are vacant or under-used and of poor environmental quality. Those areas are, however, capable of being transformed into a mixed-use urban quarters that include some new residential development, a reduction in the amount of employment land and an intensification of
employment uses on land retained for such purposes, so that there is no net loss of employment across the waterfront area.

26 Core Strategy policy EA2 is also committed to the preparation of a Charlton Riverside Area Action Plan or Opportunity Area Planning Framework to guide the future development of the area. If implemented, it is envisaged that the area would be transformed into an attractive and vibrant mixed use urban quarter providing around 6,000 new homes, with changes in the type of employment, an improved environment and high quality business space.

27 The GLA has raised non-conformity objections to the draft Core Strategy’s proposal of SIL de-designation in Charlton Riverside as follows:

“Whilst some consolidation of the Charlton Riverside SIL may be acceptable, given the non-industrial uses currently included in the SIL and subject to strategic and local assessments, the level of consolidation implied by the Key Diagram would almost certainly exceed the strategic monitoring benchmarks for release.”

28 As such the proposals in the draft core strategy to de-designate SIL at Charlton Riverside are not in general conformity with the London Plan policy 2.17.

29 Greenwich has adopted an SPD for the Charlton Riverside area (April 2012). The SPD sets out the following vision for Charlton Riverside:

‘By 2027, Charlton Riverside will be transformed into a new urban quarter connecting Greenwich Peninsula to Woolwich Town Centre. It will comprise of a sustainable mix of uses including substantial residential use in a high quality environment focussed around an enhanced Thames Barrier Park. There will be a thriving education and creative industries hub in the eastern historical quarter surrounded by a mix of high quality, residential led uses including high quality business space. The retail and industrial uses will be consolidated and rationalised within a much improved environment and the area overall will be serviced by new and improved public transport links plugged into the transport network and will have benefitted from improvements to the Thames Path. The growth will have been supported by infrastructure that will have been provided in a co-ordinated and timely manner to meet the physical and social needs of new development and regeneration. Charlton Riverside will be a flourishing industrial, business and retail area contributing to the success of the Thames Gateway and a great place to invest, live and work.’

30 Within the GLA response to that consultation it was made clear that the level of SIL release proposed and the phasing of the release of industrial land needs to be considered further. Whilst the production of an SPG for the area is welcomed, it does not go far enough in specifying the exact quantum of SIL release and the exact location and nature of subsequent mixed use development. Discussions are on-going with the Council regarding its evidence base and plans and rationale for implementation.

31 With regard to this specific proposal, given that education use is strongly supported and that there is a proposal for a primary school in place of a current educational use on the adjacent site, it is considered that the level of SIL release proposed is acceptable and pragmatic.

**Education and the principle of use**

32 Paragraph 72 of the National Planning Policy Framework seeks a proactive, positive and collaborative approach to meeting educational requirements, and encourages development that will broaden educational choice. London Plan Policy 3.18 supports these aims and promotes the
provision of education facilities to meet the demands of London’s growing and changing population. Part C of this policy states that development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes.

33 London Plan policy 3.18 affirms that, in principle, the Mayor supports provision of secondary school, further and higher education facilities to meet the demands of a growing and changing population and enable greater educational choice. The policy states that development proposals that enhance education and skills will be supported, including new build, expansion of existing facilities or change of use to educational facilities; whilst proposals that result in the net loss of education facilities would be resisted, unless it can be demonstrated that there is no ongoing or future demand.

34 Paragraph 3.103 of the London Plan states that, in general, land already in educational use should be safeguarded and new sites secured to meet additional demands or changes in provision.

35 In particular, the plan recognises (in paragraph 3.102) that access to high quality school education is a fundamental determinant of the future opportunities and life chances of London’s children and young people. Paragraph 3.108 adds that further education is particularly important to the large proportion of Londoners who do not go into higher education and in some places, sixth form provision; noting that further education colleges provide a key role in skills development and lifelong learning and assist the employment prospects of Londoners in general.

36 In this instance, the establishment of a technical college in close proximity to industrial and other commercial businesses would create opportunities for mutually beneficial links between each other. Students could gain practical experience by training in nearby businesses premises; experienced local workers could offer practical training as visiting mentors to the college; and local businesses could send their staff for continuing professional development at the proposed college.

37 In these significant respects, the principle of establishing a university technical college is strongly supported in strategic planning terms, and at central and local government levels.

Urban design

38 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 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 and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

39 The proposed college would provide reuse some of the buildings on site, remove others, and provide a new main building to form a street-facing address for the new development. The overall design principles are sound, with the reused and new buildings providing a sustainable solution to the site’s constraints while taking account of its industrial history and economic context.

40 The proposed site layout is appropriate and the striking new building would successfully address the street. The siting of the open areas to the rear of the site, adjacent to the closed industrial estate is welcomed.
The site abuts Metropolitan Open Land (MOL), which is also part of the Capital Ring and Green Chain Walk. The protection of character and amenity, including views from MOL, is given primary importance as set out in London Plan policy 7.17. The land does not have a particularly open character at present, given its position as a relatively narrow link between larger areas of MOL to the south, and the riverside to the north. However, this land does have visual amenity value, which would be enhanced by the proposed building, and removal of redundant structures towards the rear of the site. The new building would create a clear edge to the land and the proposed use of sympathetic materials would be appropriate.

While the main entrance at the front of the site is in an accessible location and fully supported, the reliance on a platform lift or stairs does not provide the most convenient access for visitors with pushchairs or wheelchairs. The arrangement should be made more adequate by appropriate signage and a management strategy.
Inclusive design and access

43 The London Plan (policy 7.2) requires all new development to meet the highest standards of accessibility and inclusion (not just the minimum required under the Building Regulations); and to ensure from the outset that the design process takes all potential users of the proposed places and spaces into consideration, including disabled and deaf people, older people, children and young people. This, together with the Supplementary Planning Guidance ‘Accessible London: achieving an inclusive environment’, underpins the principles of inclusive design and aims to achieve an accessible and inclusive environment across London. In addition, these policies require all referable planning applications to be accompanied by a design and access statement, following engagement with relevant user groups, to demonstrate how the principles of inclusive design and accessibility have been integrated into the proposed development, whether relevant best practice standards such as British Standard BS8300:2009 have been complied with, and how inclusion would be maintained and managed.

The principal entrance

44 The main concern with this application in terms of inclusive design is the principal entrance arrangements to Woolwich Road. The main entrance to the building off Woolwich Road is stepped. A significant number of steps are provided up to the principal entrance point. A platform lift is provided in addition to the steps; however, this raises some concern.

45 The provision of steps and a platform lift creates segregation in the design of this building. As this section of the building is new-build, it should embrace inclusive design principles, rather than segregate people who require level access (who would use the lift), and those capable of using the steps.

46 The fact that the design incorporates steps is designing-in a disabling barrier from the outset, and this should not be the case with a new-build development, or the new build element of this development. An entrance which is inclusive and provides equality of access for everyone, including people who require level access, should be provided.

47 The reliance on a mechanical device to provide access into a building for people who require level access is also flawed and objected to. If the platform lift were to break down, level access into the main entrance would not be achievable, and from an inclusive design perspective, this is not acceptable.

48 There are also concerns regarding the use of a platform lift externally and the effects of inclement weather conditions and vandalism on its suitability to serve its purpose.

49 From an inclusive design perspective, the design of the principal entrance to Woolwich Road should be re-visited.

Internal circulation

50 Another concern regarding inclusive design involves the internal circulation core. Only one circulation core is proposed for the entire building. The statement from the design and access statement that “within the College all areas are fully accessible by lifts” suggests that more than one lift would be provided. However, only one lift is illustrated on the proposed ground floor plan.

51 Most students would approach the building via the principal entrance to Woolwich Road at first floor level, and would use this circulation core to access the ground floor, where the learning facilities are provided. This circulation core will therefore see significant levels of foot fall, including students accessing the special educational needs (SEN) facilities on the ground floor.
There is concern that in peak times that area could become very congested; but also the reliance on one lift for the entire technical college would cause significant problems if the lift broke down or was out of use for servicing. If the lift was not in use (for whatever reason) the majority of the building would not be usable by someone who required level access and was using the principal entrance; and a visitor arriving by car would not be able to access the proposed first and second floors. Given the ‘new build’ element of this scheme, this is a significant concern.

**The external environment**

The design of the disabled persons parking illustrated to the rear of the building appears to be fine, however, the applicants should show that the level of disabled persons parking provision is adequate for the proposed use, and will be suitable for the expected numbers of disabled staff, visitors and students.

It should be shown that the pedestrian route into the site from the parking to Ferranti Close would be of a suitable width and gradient.

It should also be ensured that the pedestrian route labelled ‘restricted pedestrian access’ on the proposed site plan would be designed in accordance with the latest design guidance, so that as many people as possible can use it; especially as it would also serve be as a community entrance to the outside space. The applicants may wish to re-visit details such as ramp design and landings that are clear of gate swing.

If any of the gates are to be locked and operable via a security system, it should be ensured that any such system is accessible, and takes into account the needs of a range of disabled people.

It should also be ensured that the external space and recreation facilities are accessible.

As there are significant concerns in terms of inclusive design, the applicant (or consultant) may wish to arrange a meeting with the GLA access advisor to discuss the recommendations set out above.

**Transport for London’s comments**

**Trip generation and mode of travel**

The approach to trip generation seems broadly in line with TfL guidance – however, TfL has requested verification of mode of travel data, including data from comparable existing development.

**Traffic impact**

The local network already suffers from congestion. The applicant’s transport statement indicates 90 student arrivals (mainly drop-off) by car during the morning (AM) peak and 100 departures, (pick-up) by car during the evening (PM) peak, for which there is no on-site provision; as well as staff predominantly travelling to park on the street. This activity may have a detrimental impact on the operation of Woolwich Road, local buses and cycling and walking. TfL seeks clarification on how vehicle activity associated with the proposed facility would be provided for and managed by the applicant; and in particular, how adverse impacts on Woolwich Road would be mitigated.
TfL has requested additional data to enable assessment of the traffic generated by the development compared to the baseline position. TfL can provide supply traffic data for the local road network. If the change is significant TfL may request local junction modelling.

Bus network

TfL would like to ensure use of local bus services is encouraged. The mode share predicted in the transport statement is for 252 students (equal to 3 to 4 bus loads) during the morning (AM) peak hour. Whilst there is a high frequency of buses passing by the site, there may be a need for extra bus services/frequency. TfL awaits further information on the likely home locations of students to allow a more detailed assessment. TfL may request a financial contribution to fund service enhancements.

An audit of local bus stops against TfL Bus Stop Accessibility Guidance (January 2006) should be included as part of the baseline assessment and would form the basis for negotiations.

Pedestrians and walking

TfL recommends a Pedestrian Environmental Review System (PERS) audit (or similar) of local routes to nearby bus stops; Charlton and Woolwich Dockyard train stations; local routes to the residential hinterland and the development of a way-finding strategy. These should be subject to condition and Section 106 contributions may be appropriate to address any defects identified and to implement the strategy. Before the development is occupied good pedestrian facilities and safer/convenient crossing points should be in place to encourage the use of more sustainable modes in accord with London Plan policy.

Cycle Superhighway

Cycle superhighway 4 (CSH4) is proposed along Woolwich Road. It would be appropriate for the applicant to contribute to the delivery of CSH4 if it is not funded before hand. This would help meet the Travel Plan target to increase cycling to site and accord with London Plan policy.

Travel plan

TfL welcomes the proposed travel plan and suggests that it should be assessed using the ATTRButE tool – TfL is happy to undertake this assessment. TfL’s prime concern with the proposal is that if they are not properly managed, drop-off and pick-up activity could impede cyclists, buses and traffic using the Strategic Road Network and compromise safety. TfL is concerned that from the outset it is expected that a high proportion of staff would travel to the site by car and are expected to park on the street. The purpose of the travel plan is to change behaviour. When the college is first established there would be a significant opportunity to encourage pupils and staff to make sustainable travel choices.

Cycle and car parking

The proposed level of cycle parking is below minimum London Plan requirements. Consideration should also be given to the provision of spaces close to the main entrance instead of just at the rear of the site.

The proposal to provide minimal car parking on site is welcome as this combined with other measures should help discourage car trips. However staff and students should be prevented from applying for parking permits in the event of a CPZ being introduced.
To accord with London Plan standards 2 electric vehicle charging points should be provided. Access by mini bus/coach should consider and information supplied to TfL. The proposed disabled parking should also be re-considered to better locate spaces close to the main entrances to the teaching areas.

These matters should be addressed by planning condition and/or legal agreement as appropriate.

Construction and servicing

A construction logistics plan (CLP) and a delivery and servicing plan (DSP) are requested to minimise disruption to the A206 Woolwich Road during construction and future operation of the site. The latter can form part of the travel plan as suggested by the applicant and TfL guidance. The CLP and DSP, as well as the travel plan, should be secured by condition or via a section 106 agreement.

Conclusion

In summary TfL considers the applicant needs to provide further information on a range of matters before it can confirm if the development accords with the transport policies of the London Plan.

Climate change mitigation

Chapter 5 of the London Plan sets out the approach to climate change and requires developments to make the fullest contribution to minimizing carbon dioxide emissions. The policies as collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change.

Energy

Be Lean

Energy efficiency standards

A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficient lighting and mechanical ventilation with heat recovery. The demand for cooling will be minimised through the use of high-performance glazing.

The development is estimated to achieve a reduction of 2 tonnes per annum (6%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development.

Be Clean

District heating

The applicant has identified that the development is within the vicinity of the Greenwich Peninsula district heating network. However, connection to the network will not be available prior
to completion of the building. The applicant has, however, provided a commitment to ensure that the development is designed to allow future connection when it becomes available.

77 The applicant should continue to prioritise connection to the Greenwich Peninsula district heating network and should provide details of correspondence summarising the next steps and timescales for connection.

78 The applicant states that if the area district heating scheme is rolled out to the UTC, there would be a potential to offset 2.2 tonnes of carbon dioxide emissions from the building’s heat load. This would represent a further reduction of 9% on the overall carbon dioxide emissions.

79 The applicant should confirm that all building uses will be connected and supplied from a single energy centre. The location and size (in sq.m.) of the energy centre should be provided.

Combined heat and power (CHP)

80 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

81 The development would instead be heated using condensing boilers.

Be Green

Renewable energy technologies

82 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 140 sq.m. of roof-mounted photo voltaic panels. A drawing of the potential location of the PV panels has been provided. A reduction in regulated carbon dioxide emissions of 10 tonnes per annum (28%) would be achieved through this third element of the energy hierarchy. This appears high and should be supported by evidence.

Overall carbon savings

83 The estimated regulated carbon emissions of the development are 24 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account.

84 This equates to a reduction of 10 tonnes of carbon dioxide per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 28%.

85 Based on the information provided, the carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan. However, further clarification on how these savings were derived is required before the carbon savings can be verified.

Overview of the proposals

86 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

Climate change adaptation

87 Developments are also required to be adaptable to the climate London will experience over their lifetime and should be designed for the warmer, wetter winters and hotter, drier summers and
to withstand possible natural hazards (such as heatwaves, flooding and droughts) that may occur. Chapter 5 of the London Plan considers climate change adaptation, specifically policies 5.9 through to policy 5.15.

Flood risk

88 The site falls within zone 3a on the Environment Agency flood map and is subsequently considered to have a relatively high risk (i.e. 1 in 200 or greater probability or >0.5%) of tidal flooding from the River Thames in any year, discounting any protection afforded by the existing flood defence barrier.

89 The ‘Technical Guidance to the National Planning Policy Framework’ places the proposed educational institution in the ‘more vulnerable’ category of development, within which such uses are permitted in principle, provided they pass the ‘exceptions test’ described in that document. The applicant’s Flood Risk Assessment report suggests that the scheme proposed fulfils the requirements of that test.

90 London Plan policy 5.12 (Flood risk management) requires developments that are required to pass the exceptions test to incorporate flood resilient design and emergency planning to ensure that the development remains safe and operational under flood conditions; has a strategy in place to follow for safe evacuation/remaining safely in the building; key services, such as electricity and water would continue to be available; and that the buildings are designed for quick recovery following a flood.

91 In response to those requirements, the applicant’s flood risk assessment explains that the site benefits from the concrete and sheet piling-fortified Thames Barrier flood defences, which are permanently maintained at minimum safe levels and inspected twice yearly by the Environment Agency to ensure fitness for purpose. The agency has also confirmed that in overall condition the barrier scores a grading of 2 (good) in the vicinity of the site (on a scale of 1 to 5, where 1 is very good and 5 is very poor). The barrier is maintained in conjunction with the raised tidal defence wall and concrete capped embankment situated along the southern bank of the River Thames. In practice, therefore, the site is protected from events in the tidal Thames to a standard above 1 in 1000 (> 0.1%) annual probability of risk.

92 In addition, the Environment Agency operates a flood warning service for Greenwich using its Flood Warnings Direct system, albeit one that does not specifically include warnings in the event of a breach of the flood defences.

93 Whilst the probability of a tidal breach of the flood defences is relatively low, modelling of a potential breach of the barrier indicates that parts of the site could be inundated with water to a depth of up to 2 metres within 18 hours of the occurrence. The time interval is more than adequate to allow a safe and dry evacuation of the proposed building and a safe escape route is available via an access from the first floor of the building onto Woolwich Road.

94 A robust emergency evacuation plan, setting out the means of warning, lines of communication, personal roles and responsibilities, dry evacuation routes and contingency plans, e.g. in the event of a power failure, is therefore required. The plan should be secured by means of an appropriate planning condition, in consultation with the Council’s Emergency Planning and local emergency services, if Greenwich Council is minded to grant permission.

95 Flood resilience measures, such as the location of the boiler room, the main server room and key electrical controls at first floor level should also be encouraged to help mitigate the overall risk.
Surface water run-off

96 London Plan policy 5.13 (Sustainable drainage) requires new developments to adopt sustainable urban drainage systems unless there are practical reasons for not doing so. Developers should aim to achieve green-field run-off rates and that surface water run-off is managed as close to its source as possible, in accordance with a preferred hierarchy.

97 The nature of the development indicates that hard landscaping would remain the predominant surface of the site, with some planting on peripheral areas to enhance its appearance. As a result, the applicant proposes a 50% reduction in surface water run-off at peak times, by means of a 400 cubic metre storage tank to be located at the north of the site.

98 This method and proportion of run-off attenuation is in line with the essential standard recommended in supplementary planning guidance to the London Plan and is therefore acceptable.

Community Infrastructure Levy

99 In accordance with London Plan policy 8.3, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL) that will be paid by most new development in Greater London. Any development that receives planning permission after the 1 April 2012 will have to pay, including:

- Cases where a planning application was submitted before 1 April 2012, but not approved by then.
- Cases where a borough makes a resolution to grant planning permission before 1 April 2012 but does not formally issue the decision notice until after that date (to allow a section 106 agreement to be signed or referral to the Secretary of State or the Mayor, for example).

100 The Mayor has arranged boroughs into three charging bands with rates of £50/£35/£20 per square metre of net increase in floor space respectively (see table, below). The proposed development is within the Royal Borough of Greenwich where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website http://london.gov.uk/.

Developments used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education attract a nil charge.

101 Within London both the Mayor and boroughs are able to introduce CIL charges and therefore two distinct CIL charges may be applied to development in future. At the present time, borough CIL charges for Redbridge and Wandsworth are the most advanced. The Mayor’s CIL will contribute towards the funding of Crossrail.

<table>
<thead>
<tr>
<th>Mayoral CIL charging zones</th>
<th>London boroughs</th>
<th>Rates (£/sq. m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Camden, City of London, City of Westminster, Hammersmith and Fulham, Islington, Kensington and Chelsea, Richmond-upon-Thames, Wandsworth</td>
<td>£50</td>
</tr>
<tr>
<td>2</td>
<td>Barnet, Brent, Bromley, Ealing, Greenwich, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets</td>
<td>£35</td>
</tr>
<tr>
<td>3</td>
<td>Barking and Dagenham, Bexley, Croydon, Enfield, Havering, Newham, Sutton, Waltham Forest</td>
<td>£20</td>
</tr>
</tbody>
</table>
Local planning authority’s position

Greenwich Council officers have taken a positive stance on the proposed development and propose to report this application to the local Planning Board on 12 July 2012, with a recommendation for approval.

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. 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 employment, strategic industrial locations, education, urban design, inclusive design and access; transport, energy, and sustainable design and construction are relevant to this application. In general, the application complies with some of these policies but not with others, for the following reasons:

- **Land use policy/the principle of use**: The change of use of land in a strategic industrial location is a departure from the development plan and, in principle, contrary to policy 2.17, which states that development proposals in SILs should be refused unless they meet specified criteria. In this instance, however, the proposed college is acceptable given the previous use the site for skills and training purposes; and the potential link between the existing industrial surrounding and the technical skills to be offered within the new development.

- **Inclusive design and access**: The use of an external platform lift at the principal entrance of the building, coupled with the lack of an alternative access arrangement in the event of the internal lift breaking down and inadequate information on access provisions at the rear of the buildings fall short of the requirements of policy 7.2 of the London Plan.

- **Transport**: TfL requires clarification and verification of some of the technical information provided in the applicant’s transport statement. TfL may require financial contributions towards the implementation of relevant transport improvements and design changes to ensure compliance with the transport policies of the London Plan.

- **Energy**: The submitted energy strategy does not confirm that all the building uses would be connected and supplied from a single energy centre, nor the location and size of the proposed energy centre. The strategy also lacks the necessary evidence to enable the GLA energy advisors to verify the relatively high reduction/savings in the regulated emission of carbon dioxide per year.
• **Flood risk**: The flood risk assessment indicates that a detailed emergency evacuation strategy should be put in place to fulfil the requirement London Plan policy 5.12C(b).

106 On balance, the application does not comply with the London Plan.

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

• **Inclusive design and access**: The applicant is requested to address the access concerns raised in paragraphs 43 to 58 of this report, as summarised in paragraph 105 above.

• **Transport**: Some additional information and negotiations with TfL are required in order to resolve the transport issues and financial contributions identified in paragraphs 59–72 (TfL comments) of this report, as summarised above.

• **Energy**: The applicant should confirm in writing that all the building uses would be connected and supplied from a single energy centre, the location and size of which would also be provided. Detailed evidence should also be submitted to enable the GLA energy advisors to ascertain how the relatively high savings in the regulated emission of carbon dioxide per year were derived.

• **Flood risk**: A robust emergency evacuation strategy should be submitted as part of any further referral this application to the Mayor, to ensure that it is fully compliant with the requirements of the London Plan policy.

---

for further information, contact Planning Decisions Unit:

**Colin Wilson, Senior Manager – Planning Decisions**
020 7983 4783   email colin.wilson@london.gov.uk

**Justin Carr, Strategic Planning Manager (Development Decisions)**
020 7983 4895   email justin.carr@london.gov.uk

**David Blankson-Hemans, Senior Strategic Planner, Case Officer**
020 7983 4268   email david.blankson-hemans@london.gov.uk