Strategic planning application stage 1 referral (new powers)


The proposal

Mixed-use redevelopment of the site comprising a foodstore (8,451 sq.m.), retail/community space, a 100-bed hotel, a children's nursery, business incubator units and up to 216 residential dwellings with associated parking (492 spaces), servicing and public realm improvements.

The applicant

The applicant is Development Securities (Abbey Wood) Ltd and the architect is Bradley Design Associates.

Strategic issues

The application raises the following key strategic planning issues: mixed-use development, the proposed retail foodstore, housing, urban design, air quality, energy and transport.

Recommendation

That Greenwich Council be advised that whilst aspects of the proposal are supported, it raises a number of matters of strategic concern and does not currently comply with the London Plan for the reasons set out in paragraph 88 of this report.
1 On the 7 January 2013 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 had until the 15 February 213 to provide the Council with a formal 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 and this report sets out information for the Mayor's use.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- 1A. Development which comprises or includes the provision of more than 150 houses, flats or houses and flats.
- 1B. Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - (c) outside Central London and with a total floorspace of more than 15,000 square metres.
- 1C Development which comprises or includes the erection of a building of the following description - (c) the building is more than 30 metres high and is outside the City of London.
- 3E. 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 any of the following classes in the Use Classes Order— (i) class A1 (retail); (ix) class C1 (hotels).
- 3F. Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.

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; take it over for his own determination; or allow the Council to determine it itself.

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 site is 3.92 hectares in size and is located at the eastern edge of the London Borough of Greenwich, immediately to the west of Harrow Manor Way. This road forms the boundary between the London Boroughs of Greenwich and Bexley. The site has been vacant since 2007 and contains derelict offices and industrial premises last used by Gallions Housing Association and Nexans (a cable manufacturing company). The southern boundary of the site is approximately 100 metres north of the Abbey Wood station. Abbey Wood neighbourhood centre which provides a range of local shops and services is situated immediately to the south of this station.
6 The site is bounded by Thistlebrook, Boxgrove Road, Felixstowe Road and Harrow Manor Way. The A2016 (Eastern Avenue), forms part of the Strategic Road Network (SRN) and is approximately 1 km. away. The nearest part of the Transport for London Road Network (TLRN) is approximately 5 km. from the site.

7 This site has a Public Transport Accessibility Level (PTAL) of 4, measured on a scale of 1 to 6, where 6 is the most accessible. Five adjacent or nearby bus routes provide direct links to Lewisham, Thamesmead, Woolwich Common, Sidcup and Bexleyheath. Abbey Wood station provides rail links to Central London, where Crossrail services are expected to begin in 2018/19.

Details of the proposal

8 A hybrid planning application for demolition of existing buildings and comprehensive mixed use redevelopment comprising:

i) Detailed planning permission for a Class A1 foodstore (8,451 sq.m. gross / 4,514 sq.m. net sales area), Class A1/A2/A3/D1 retail/community use unit(s) (309 sq.m.); a Class C1 hotel (3,718 sq.m./100 bedroom); 30 Class C3 residential units, a new public square and associated access, servicing, parking (492 spaces), landscaping and works; and;

ii) Outline planning permission, with all matters reserved except means of vehicular access, for Class C3 residential units (up to 186), Class B1 start-up business units (426 sq.m.), Class D1 early years children's nursery (up to 460 sq.m.) and associated access, servicing, parking, landscaping and works.

Case history

9 A pre-application meeting was held with the applicant on the 9 July 2012. Support for a mixed use redevelopment of the site was offered, but concerns were raised in respect of the scale and impact of the proposed retail store, the level of affordable housing, urban design, inclusive access, transport, energy, and sustainable design and construction.

10 The principle of a residential use on the northern part of the site was formalised in Greenwich Council’s 2006 Unitary Development Plan and the Council resolved to grant planning permission for 267 residential units across this portion of the application site in July 2012. The applicant however advises that the associated section 106 planning agreement was not signed because of viability concerns.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Mix of uses London Plan;
- Regeneration London Plan;
- Tourism/leisure London Plan; Good Practice Guide on Planning for Tourism (DCLG);
- Retail/town centre uses London Plan;
- Housing London Plan; Housing SPG; Housing Strategy;
- Urban design London Plan;
• Inclusive design and 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;
• Air quality  London Plan; the Mayor’s Air Quality Strategy;
• Transport  London Plan; the Mayor’s Transport Strategy;
• Crossrail  London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG;

12 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 2011 London Plan, and the saved policies of the London Borough of Greenwich’s 2006 Unitary Development Plan (UDP).

13 The following are also relevant material considerations:
• The Revised Early Minor Alteration to the London Plan.
• The Thamesmead and Abbey Wood SPD approved by Greenwich and Bexley Councils in 2009.
• The saved policies of Bexley Council’s 2007 UDP.

Mix of uses

14 The site has no specific land use suggested in the London Plan nor is it within a Strategic Industrial Location where residential or large scale retail uses would normally be resisted. It does however fall within the Thamesmead and Abbey Wood Opportunity Area, one of the capital’s reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. The London Plan identifies an indicative capacity for 4,000 new jobs, a minimum of 3,000 new homes, or a combination of the two, within this Opportunity Area, linked to the commencement of a Crossrail service at Abbey Wood station from 2018/19.

15 The inclusion of hotel in close proximity to Abbey Wood station is supported by London Plan policy which explicitly encourages the provision of new visitor accommodation beyond the Central Activities Zone (CAZ) where it is focussed in town centres and opportunity and intensification areas that provide good public transport access to central London and international and national transport termini. Abbey Wood station currently provides such access to London Bridge and Charring Cross stations and its accessibility will be further enhanced by Crossrail.

16 A residential-led mixed-use development incorporating a hotel, nursery, business units and small scale retail/community units is therefore supported in strategic planning terms.
The proposed retail foodstore

London Plan and local policy

17 Abbey Wood does not form part of the London Plan’s Town Centre Network as set out in Annex 2 of the London Plan. The west side of Wilton Road (to the south of Abbey Wood Station and approximately 200 m. to the south of the application site), is though defined as a Neighbourhood Parade in Greenwich Council’s UDP, whilst the east side of Wilton Road, (which is in the London Borough of Bexley), is a defined Neighbourhood Centre in its 2007 UDP.

18 Annex 2 (paragraph A2.3) of the London Plan provides strategic guidance on the role of such local centres and describes them as typically serving a local catchment (often most accessible by walking and cycling), that provide convenience goods and other services. It also suggests that they might include a small supermarket (typically up to around 500 sq.m.), sub-post office, pharmacy, launderette and other useful local services.

19 The application site is therefore not within a town centre where a foodstore of this scale would normally be located in order to comply with policy 4.7Ba and Annex 2 (paragraph A2.3) of the London Plan. It is though acknowledged that the site is well served by public transport, which will be further improved by Crossrail.

20 London Plan policy 4.7 provides a set of principles that should be applied when taking planning decisions on such proposals. These are:

- That its scale should be related to the size, role and function of a town centre and its catchment.
- That it should be located within an existing town centre, or if no in-centre sites are available, on a site on the edge of a town centre and be well integrated with the existing centre and public transport.
- That it be subject to an impact assessment.

21 Policy 4.9 of the London Plan goes on to state that when considering proposals for large retail developments, the Mayor will, and boroughs should, consider imposing conditions or seeking contributions through planning obligations (where appropriate, feasible and viable), to provide or support affordable shop units suitable for small or independent retailers and service outlets and/or to strengthen and promote the retail offer, attractiveness and competitiveness of such centres. This policy is designed to provide support for independent retailers and small enterprises.

The National Planning Policy Framework (NPPF)

22 Paragraph 24 of the NPPF states that local planning authorities should apply a sequential test to planning applications for town centre uses, and should firstly require such applications to be located in existing town centres and secondly in edge of centre locations. Out of centre sites should then only be considered if no suitable sites are available.

23 Paragraph 26 of the NPPF states that when assessing applications for out of centre development, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, (as is the case here). This should include an assessment of the impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal, and assess the impact of the proposal on the vitality and viability of existing centres.
24 Paragraph 27 then states that applications that fail to satisfy the sequential test or would be likely to have significant adverse impact on one or more of the above factors should be refused.

Pre-application advice

25 The applicant was advised at pre-application stage that given the thresholds in the London Plan (and the NPPF), that there was concern that its proposed foodstore would be excessive in scale relative to the current status of Abbey Wood. They were also advised that the outcome of any formal application would depend to a significant extent on a robust analysis of the sequential test of location, and compelling evidence being presented that a store of the scale sought would not, (in conjunction with other retail developments in the pipeline), adversely impact on existing centres such as Thamesmead, Plumstead and Woolwich.

Assessment

26 The applicant has submitted a Town Centre and Retail Statement that considers these matters. This concludes that no significant adverse impact would be caused to nearby town centres by its proposals and that significant benefit would accrue to the Abbey Wood neighbourhood centre by increasing its attractiveness, offer and turnover, and by providing spin-off benefits to existing retailers. The applicant also suggests that its proposals would encourage investment in advance of Crossrail and demonstrate significant investment in area.

27 However, the submitted Town Centre and Retail Statement is deficient in a number of areas and appears to have largely limited its “area of search” for the sequential assessment to Abbey Wood (paragraphs 7.9 – 7.23); when it should have looked in detail at possible sites in Thamesmead, Plumstead and Woolwich. The statement also appears to have failed to take into account the recent resolution to grant planning permission for large scale Sainsbury’s and Marks and Spencer stores at Woolwich Road, Charlton when assessing the cumulative impact its proposals would have on existing centres.

28 Notwithstanding these deficiencies, the statement acknowledges that the proposals would have significant effects on turnover in Woolwich, Thamesmead and Bexleyheath town centres, (Table 8.6), but it then fails to adequately identify what the impact of these losses would be. Of particular concern is the identified 14.5% (£9.3 million a year) loss of trade in Thamesmead - irrespective of under/over trading considerations.

29 A supermarket of this scale would therefore raise strategic concerns that should be fully addressed by the applicant and Greenwich Council before the scheme is referred back to the Mayor at Stage 2.

30 Finally, it is suggested that the applicant identify, propose and agree a range of costed interventions that might help mitigate the adverse impact of its proposals on the existing centres at Woolwich, Thamesmead and Abbey Wood. These should then be discussed with Greenwich and Bexley Council’s and secured as appropriate through any section 106 planning agreement should the application receive consent.

31 It is also recommended that these matters be formally reviewed by Greenwich and Bexley Councils, so that the Mayor can take full account of their views of the impact the proposals on existing town centres when the application is referred back to him at Stage 2.
Housing

Housing supply

32 London Plan policies 3.3 and 3.4 affirm the Mayor’s commitment to increase London’s housing supply through the monitoring of annual targets that borough Councils are encouraged to exceed, by identifying new sources of supply and maximising the development potential of sites to an extent that is compatible with local context, public transport capacity and strategic design principles. The associated table 3.1 provides up-to-date housing targets for London (32,210 units per annum) and each of the boroughs, for the ten-year period between 2011 and 2021.

33 The borough target for Greenwich is 2,595 new homes per annum for the above period, the vast majority of which are expected from large and small sites identified in the 2009 Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA/HCS). The Thamesmead & Abbey Wood Opportunity Area is expected to contribute a minimum of 3,000 new homes towards the borough target.

34 The mixed-use residential reuse of this brownfield site would make an important contribution towards the achievement of these targets.

Unit mix

35 The applicant is proposing up to 216 units with the following housing mix:

<table>
<thead>
<tr>
<th>Unit Type</th>
<th>Number (%)</th>
<th>Floorspace sqm (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Bed 2 Person Flats</td>
<td>62 (28)</td>
<td>3,321 (21)</td>
</tr>
<tr>
<td>2 Bed 3 Person Flats</td>
<td>62 (29)</td>
<td>4,113 (26)</td>
</tr>
<tr>
<td>2 Bed 4 Person Flats</td>
<td>49 (23)</td>
<td>3,819 (24)</td>
</tr>
<tr>
<td>2 Bed 4 Person Houses</td>
<td>6 (3)</td>
<td>558 (4)</td>
</tr>
<tr>
<td>3 Bed 5 Person Flats</td>
<td>19 (9)</td>
<td>2,248 (14)</td>
</tr>
<tr>
<td>3 Bed 5 Person Houses</td>
<td>10 (5)</td>
<td>1,064 (7)</td>
</tr>
<tr>
<td>4 Bed 6 Person House</td>
<td>8 (4)</td>
<td>904 (6)</td>
</tr>
<tr>
<td>Total</td>
<td>216 (100)</td>
<td>16,027 (100)</td>
</tr>
</tbody>
</table>

36 Thirty seven of the units would be family homes (3 bedroom +), which equates to 18% of the total. This is acceptable given the site’s context, building form and the large amount of family housing in the adjoining areas.

Affordable housing

37 The scheme proposes that 36 of the units would be affordable, comprising 20 intermediate units and 16 social rented units. This equates to 16% of the total by units and 19% by habitable rooms. This relatively low level of affordable is justified by the applicant on the basis that it has been “informed by Gallions Housing association which owns over 5,000 units in the wider area”, (and which also owns part of the site), and by its submitted financial appraisal which concludes that this is the maximum reasonable amount of affordable housing the scheme can support.
However, the applicant has used the GLA’s 2010 Toolkit methodology and assumptions. It is therefore strongly suggested that the applicant resubmit its appraisal using the most up to date costs and values so the Mayor can be satisfied that its assumptions are valid and the maximum reasonable level of affordable housing would be secured. The need for, rational and funding of the proposed social rented units should also be set out.

Density

The scheme’s density has been calculated as 331 habitable rooms per hectare which accords with London Plan guidance in this respect.

Children’s play space

The scheme would be likely to result in approximately 53 children which would indicate a need for a minimum of 530 sq.m. of dedicated playspace. A 200 sq.m. “Local play Area” is proposed within the scheme together with an additional landscaped area of approximately 500 sq.m. This is considered acceptable from a strategic perspective.

Urban design

The scheme proposes a number of separate elements.

The supermarket would be built at first floor level above its carpark and would provide a 4,514 sq.m. sales area accessed from the carpark. One entrance would link to Abbey Road station and a second entrance is positioned in the middle of the store’s main frontage in order to provide additional animation and security.

The store would be serviced from the rear, and some attempt has been made to animate it’s main public frontages to the east and south. An attractive area of public realm is also proposed to reinforce the link to Abbey Road station. The submitted design and access statement shows how this approach was developed and also suggests an attractive and considered approach to external appearance to the foodstore. This is welcomed and supported in strategic planning terms.
However there is concern with the layout of the residential blocks to the east of the proposed food store (Blocks F and G). The proposed layout fails to effectively wrap the servicing area and car park, which would have a detrimental impact on the quality of the public realm in this area. An alternative and better approach would see these blocks attempting to wrap all parking and servicing within a private court in the same way as has been done with Block B and C.

The location and size of roundabout is also a concern in urban design terms, as this will be result in a very poor pedestrian environment and experience, particularly in relation to the width of the carriageway to the food store. A more compact and pedestrian friendly layout should therefore be explored.

The proposal envisages a variety of residential elements, including a 12 storey tower, again located to reinforce the link to Abbey Road station. Buildings to the rear of the site range from 3 to 6 storeys and are considered to be generally well located and designed.

The proposed 6 storey hotel has been designed as a landmark building that would help define and enhance the character of this part of the development. 10% of the rooms have been designed to be wheelchair accessible. Both aspects are supported in strategic planning terms.

A number of ground floor “business start up” units are proposed throughout the scheme. These are considered beneficial from a strategic planning perspective, though care will need to be taken to protect the residential amenity of the adjoining residential units.

The inclusion of location and broad design of the nursery is supported.

At pre-application stage the applicant was advised that the Mayor would require sufficient information to determine compliance with relevant GLA standards and guidance. This matter still requires full assessment.

Inclusive design and access

The applicant’s submitted Design and access statement shows broad compliance with relevant London Plan policies and guidance.

Flood risk

The site is located within an identified (but defended) area at known flood risk, (Flood zone 3). A Flood Risk Assessment was therefore submitted with the application and the following measures are proposed:

- All residential units, the hotel and the nursery would have safe access to upper floors or refuge areas.
- The supermarket has been positioned on stilts above the flood level.
- All retail, business and community uses would have safe access to the upper level of the supermarket in an emergency.
- A Flood Management Plan will be produced for each plot at the detailed design stage.

This is considered acceptable from a strategic perspective, subject to any detailed concerns raised by the Environment Agency or Greenwich Council, and should be secured by appropriate planning conditions and/ or section 106 clauses.
**Air quality**

54 The whole of the London Borough of Greenwich has been designated and Air Quality Management Area due to existing poor air quality, and the Mayor does not generally support the installation of new biomass boilers in London due to their acknowledged adverse air quality impact. This arises because the burning of biomass for heat and energy produces particulate matter (PM) emissions which aggravate respiratory and cardiovascular conditions. The health impacts of PM2.5 are especially significant, and the Mayor commissioned a study in 2010 which suggested that around 4,300 deaths per year in London are partly caused by long-term exposure to PM2.5 (which is widely acknowledged as being the pollutant which has the greatest effect on human health).

55 An alternative energy source should therefore be explored and proposed.

56 A number of Best Practice and Supplementary Guidance will be published by the Mayor in spring 2013. These will include means to control dust and emissions from construction and demolition, emissions standards for CHP plant, and ways to secure air quality neutrally. The Mayor would expect these to be appropriately reflected in any planning permission for this scheme. This would include a requirement that any gas boilers would be ultra low NOx and energy efficient.

**Energy**

**Overview of proposals**

57 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO2) emissions and sufficient information has been provided to understand the submitted proposals. Further revisions and information are however required before the proposals can be considered acceptable and the CO2 savings verified.

**BE LEAN**

**Energy efficiency standards**

58 A range of passive design features and demand reduction measures are proposed to reduce the CO2 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 high efficacy lighting and air quality (CO2) controlled ventilation in the food retail store and mechanical ventilation heat recovery (MVHR) in the hotel. The applicant should state how the demand for cooling will be minimised in the residential units, business start-up units and the hotel.

59 The development is estimated to achieve a reduction of 540 tonnes per annum (28%) in regulated CO2 emissions compared to a 2010 Building Regulations compliant development as shown in the table below.
**BE CLEAN**

*District heating*

60 The applicant has carried out an investigation and stated that there are no existing or planned district heating networks within the vicinity of the proposed development. However, the proposed development is located within a decentralised energy opportunity area which straddles the Greenwich and Bexley borough boundary and a potential heat network is shown on the London Heat Map within approximately 0.5km of the proposed development. The applicant should therefore ensure that the development is designed to allow future connection to a district heating network should one become available.

61 The applicant is not proposing to install a site heat network. However, this should be reconsidered in view of the local opportunity for decentralised energy and the layout of the development. The site heat network should be supplied from a single energy centre to ensure compliance with London Plan policy.

**Combined Heat and Power**

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

**BE GREEN**

*Renewable energy technologies*

63 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a 580 kWt biomass boiler and air source heat pumps (ASHP) to serve the food retail store and hotel.

64 In addition, it is proposed to install 70 sq.m. of solar photovoltaic (PV) panels on the roof of the nursery and 196 sq.m. of solar thermal panels on the roofs of the houses (96 sq.m.) and the nursery (100 sq.m.). Schematic drawings of the solar PV and solar thermal installations have been provided.

65 However, as set out above, a biomass boiler is not considered acceptable and an alternative approach to meeting London Plan policy requirements should be proposed. This solution should provide sufficient capacity for the entire development. A reduction in regulated CO2 emissions of 124 tonnes per annum (9%) will be achieved through this third element of the energy hierarchy (see table below).

**OVERALL CO2 SAVINGS**

66 Based on the energy assessment submitted at Stage I, the table below shows the residual CO2 emissions after each stage of the energy hierarchy and the CO2 emission reductions at each stage of the energy hierarchy.
### Table: CO2 emission reductions from application of the energy hierarchy

<table>
<thead>
<tr>
<th></th>
<th>Total residual regulated CO2 emissions (tonnes per annum)</th>
<th>Regulated CO2 emissions reductions (tonnes per annum)</th>
<th>(per cent)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline i.e. 2010 Building Regulations</strong></td>
<td>1,905</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Energy Efficiency</strong></td>
<td>1,365</td>
<td>540</td>
<td>28</td>
</tr>
<tr>
<td><strong>CHP</strong></td>
<td>1,365</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Renewable energy</strong></td>
<td>1,241</td>
<td>124</td>
<td>9</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>664</td>
<td>35</td>
</tr>
</tbody>
</table>

A reduction of 664 tonnes of CO2 per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 35%. The CO2 savings exceed the targets set within policy 5.2 of the London Plan.

**Transport**

**Highway impact**

68 TfL consider that the development would have no adverse impacts upon the operation of either the Transport for London Road Network or Strategic Road Network. However, TfL note that Bexley Council has concerns regarding the robustness of the modelling submitted with the application. As a result, TfL request that these concerns are addressed by the applicant, prior to the determination of the application.

69 TfL welcome the proposed road layout on Harrow Manor Way given that the provision of access off a roundabout aligns with TfL’s aspiration to “smooth traffic-flow”. However, as set out above, this approach would result in a poor pedestrian experience and should therefore be designed in a way that overcomes these difficulties.

**Car and coach parking**

70 The 304 car parking spaces proposed for the foodstore is in accordance with the car parking standards set out in the London Plan. The ratio of 0.68 car parking spaces per residential unit and the 26 car parking spaces for the hotel element of the development are also in line with London Plan standards.

71 Two car club spaces are proposed and there is a commitment to provide Electric Vehicle Charging Points (EVCPs) across the site in line with London Plan standards. Both proposals are welcomed by TfL. However, TfL seek additional information regarding the provision of Blue Badge car parking at the foodstore for staff and at the hotel. The further Blue Badge parking proposed also accords with London Plan policy.
72 TfL request that the levels of car parking and the specific provision for the Car Club and Blue Badge holders together with the EVCPs are secured by an appropriate planning condition/s106 obligation.

73 No coach parking will be provided as part of the hotel development, and following discussions between TfL and the applicant, this is considered acceptable given the constraints of the site. The Transport Assessment cites arrangements for pick up and drop off for guests arriving at the site by coach, and TfL welcome clarification on this matter.

Public transport impacts

74 TfL consider that the development would have no adverse impacts upon the capacity of local public transport.

75 The construction of a new site access on Harrow Manor Way requires the movement of the existing northbound bus stop. TfL request that works to relocate this bus stop and the lengthening of the bus cage associated with the southbound stop together with a new bus shelters on both sides of the road form part of the scope of the S.278 works to deliver the revised road layout. The bus stop located on the eastbound side of Overton Road should also be upgraded as part of the highway works associated with the scheme.

76 TfL consider that the above improvements would enhance the desirability for the use of public transport amongst site users, and ensure the proposal accords with policy 6.7 of the London Plan. TfL request that the specified improvements are secured as part of the Section.278 (highway) works.

77 Furthermore, it is requested that a planning condition is imposed if permission is granted, regarding the completion of highway works prior to occupation or use of any part of the development. This should include specific reference to the provision of new and upgraded bus stops to ensure that the site is accessible by public transport, and that the development has no adverse impacts upon the operation of the bus network.

Cycling

78 TfL welcome the applicant’s commitment to providing cycle parking at all land uses on the site in line with London Plan standards, and request this is secured by condition. To further promote the desirability of cycling, TfL request showers and lockers are provided at both the foodstore and hotel to promote staff cycling.

Travel plan

79 The submitted Framework Travel Plan has passed the ATTrBuTE assessment. TfL request that full Travel Plans for each element of the development are secured through condition/ the S.106 Agreement.

Construction & servicing

80 TfL welcome clarification of the likely construction phasing and volume of vehicles. TfL request that a condition/ s106 obligation is imposed requiring the submission to and approval by Greenwich Council in conjunction with TfL of a Construction Logistics Plan (CLP) before any works commence, including site preparation and enabling works.
TfL welcome the submission of a draft Delivery and Servicing Plan (DSP) for the foodstore and hotel, including clarification of the likely volume of servicing vehicles and the measures likely to be undertaken to maximise the efficiency and sustainability of these servicing operations. However, further information is requested regarding the servicing of the residential element of the scheme. TfL request that an appropriate condition/obligation is imposed to secure the submission to and approval by Greenwich Council in conjunction with TfL of a full DSP for each part of the development prior to its occupation.

Crossrail planning obligations and Community infrastructure levy

In accordance with London Plan policy 8.3 (Community infrastructure levy), the Mayor agreed to commence CIL charging for developments permitted on or after the 1 April 2012. It is noted that the proposed development is within the London Borough of Greenwich, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA).

In addition, the mechanism for contributions to be made payable towards Crossrail has been set out in the Mayor’s Supplementary Planning Guidance (SPG) ‘Use of planning obligations in the funding of Crossrail’ (November 2012) and the London Plan policy alteration. The SPG states that contributions should be sought in respect of uplift in floorspace for B1 office, hotel and retail uses (with an uplift of at least 500 sq.m.). The site is within the Rest of London Zone which requires a contribution of £31 per square metre of additional office space and £16 per square metre of additional retail space.

The applicant should note that the Mayor’s CIL charge will be treated as a credit towards the S106 liability and therefore only the greater of the two sums will normally be sought.

Conclusion

In summary, TfL considers that the applicant must provide further information on a number of matters, before TfL can confirm if the development is in accord with transport aspects of the London Plan.

Local planning authority’s position

This is not known at this stage.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on mixed use development, the proposed retail foodstore, housing, density, children’s play space, urban design, Inclusive design and access, floodrisk, air quality, energy and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons. The changes set out below might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Mix of uses**: A residential-led mixed-use development incorporating a hotel, nursery, business units and small scale retail/community units is supported in strategic planning terms.
• **The proposed retail foodstore** - The submitted Town Centre and Retail Statement should be revised and resubmitted as set out above before the scheme is referred back to the Mayor at Stage 2. The applicant should identify, propose and agree a number of costed interventions that could help mitigate the adverse impact its proposals would have on the existing centres at Woolwich, Thamesmead and Abbey Wood.

• **Housing supply** - The mixed-use residential reuse of this brownfield site is supported.

• **Housing mix** - This is acceptable given the site’s context, building form and the large amount of family sized housing in the adjoining areas.

• **Affordable housing** - The applicant should resubmit its financial appraisal using the most up to date costs and values so the Mayor can be satisfied that its assumptions are valid and the maximum reasonable level of affordable housing will be secured. The need for, rational and funding of the proposed social rented units should also be set out.

• **Density** - The scheme’s density accords with London Plan guidance.

• **Children’s play space** - The scheme’s approach to play space is considered acceptable from a strategic perspective.

• **Urban design** - Key elements of the scheme are supported, but the design changes suggested above should be made.

• **Inclusive design and access** - The applicant’s submitted Design and Access Statement shows broad compliance with relevant London Plan policies and guidance.

• **Floodrisk** - The approach to floodrisk is considered acceptable from a strategic perspective, subject to any detailed concerns raised by the Environment Agency or Greenwich Council.

• **Air quality** - A biomass boiler should not be proposed.

• **Energy** - The applicant should fully address the matters set out above.

• **Transport** - The application is broadly in accordance with London Plan policy subject to resolution of the detailed matters set out above.

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for further information, contact Planning Decisions Unit:

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