Strategic planning application stage 1 referral (old powers)


The proposal

A predominantly residential scheme (645 residential units) with a community building, flexible retail/micro brewery and space for creative industries, accommodated in a series of five buildings, along with an energy centre, public open spaces, communal gardens, access roads, landscaping and 265 car parking spaces.

The applicant

The applicants are English Partnerships and First Base (Greenwich Residential) Land Limited, and the architect is Make Architects.

Strategic issues

The site is located in the Greenwich Peninsula Opportunity Area where residential and mixed-use development is promoted. The proposal to redevelop this site for residential, community, health and commercial uses is in line with strategic planning policy. There are a number of issues that will need to be addressed in more detail before this scheme is returned to the Mayor. Further information is required relating to the renewable energy strategy, blue badge parking arrangements, transportation modelling, and the provision of a local employment and training strategy.

Recommendation

That Greenwich Council be advised that that the proposal is broadly acceptable, subject to the requirements outlined in this report.

Context

1. On 9 April 2008 Greenwich Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor’s use in deciding what comments to make.

2. The application is referable under Categories 1A and 1B of the Schedule to the Order: “Development which comprises or includes the provision of more than 500 houses, flats, or houses
“Development which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.”

3 If Greenwich Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

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

5 The comments on this case will be made available on the GLA’s website www.london.gov.uk.

Site description

6 The site is located approximately one kilometre east of Greenwich town centre at the junction of the A206 Woolwich Road, which forms part of the Strategic Road Network, and Vanbrugh Hill. The Woolwich Road turns into Trafalgar Road to the west of the site and leads into Greenwich town centre. The site is a single urban block with an area of 3.08 hectares bounded by Woolwich Road to the north, Vanbrugh Hill to the west and the rear gardens of terraced housing fronting onto Calvert Road to the south and east. The land rises up towards the south.

7 The site is predominantly vacant, although there is an operational GP practice on the south west corner of the site. The main part of the site was formerly used as a hospital, which was demolished following the site’s sale to English Partnerships in 2006. Access is currently gained through locked gates off Vanbrugh Hill and Calvert Road.

8 Seven bus routes, including one night bus, serve the site with bus stops located within acceptable walking distance on Woolwich Road, Vanbrugh Hill and Westcombe Hill. Westcombe Park and Maze Hill railway stations are both about 500 metres from the site and offer regular services into Central London and Dartford. Although not considered within walking distance, Docklands Light Railway and London Underground services are also available within two kilometres of the site. As such, it estimated that the site records a good public transport accessibility level (PTAL) of 4, on a scale of 1-6 where 6 is classed as excellent. This PTAL is likely to be further increased by the potential introduction of the Greenwich Waterfront Transit in the future.

Details of the proposal

9 The scheme divides the site into five urban blocks, and introduces a series of public open spaces including several new streets and a public square. A total of 645 residential units are proposed, ranging from 1-bedroom flats to 4-bedroom houses. 50% of the residential units (324 units) will be affordable, of which half will be intermediate housing as part of English Partnerships’ London Wide Initiative programme. The EP LWI programme is a pilot scheme launched in 2002 aimed at fast-tracking the delivery of affordable homes in Greater London. The scheme focuses on a portfolio of fifteen sites purchased by English Partnerships including this site, and is expected to deliver approximately 5,000 homes over the next five years.

10 A community building of 11,091 square metres is proposed on the north-west corner of the site at the junction of Woolwich Road and Vanbrugh Hill. The building will house the Greenwich Centre, a community centre which will include two swimming pools, leisure and spa facilities, a primary care trust health centre, local services centre, library, creche, youth employment facilities and a cafe. The Centre is to be provided in conjunction with Greenwich Council. Also proposed in the Greenwich Centre block is retail space of 1,165 square metres at ground floor level, and
residential flats located on the upper floors. A further 781 square metres of flexible retail space is proposed to be used as a microbrewery, along with three units of ‘creative industry’ space totalling 270 square metres.

Aerial view of the proposal

11 A 190 space underground car park and 65 on-street car parking spaces are proposed along both sides of the play streets and along one side of Market Street. 920 cycle spaces are provided throughout the scheme. All roof space will be used as either inaccessible living roofs, for rainwater collection and attenuation, or to develop an educational community planting scheme for residents. The proposal includes an on-site biomass combined heat and power (CHP) plant with the aim of delivering ‘zero net carbon’ heat and electricity and has a target of 100% on-site renewable energy.

Roof level masterplan
12. Block 1 comprises two buildings: one 7-storey building along Woolwich Road and one part 6, part 7-storey u-shaped building which encloses the public square that opens to the corner of Vanbrugh Hill and Woolwich Road. The u-shaped building features the Greenwich Centre, which opens onto the public square at the centre. The 7-storey building features double fronted retail units which also open into the square; retail units also occupy the ground floor along one wing of the u-shaped building fronting on Market Street which leads from Woolwich Road. Private and affordable flats occupy the storeys above both buildings, each with its own private balcony. The Greenwich Centre has a large, wave-like metallic canopy identifying the main entrance on the public square, whilst the rest of the buildings are faced in a combination of metal and glass.

13. Block 2 is a U-shaped 7-storey building which fronts the Woolwich Road and Market Street, with a smaller four-storey block of maisonettes and flats on the southern end of the block. At ground level the frontage along Woolwich Road accommodates retail use (potentially a microbrewery) whilst along Market Street three creative industry units are proposed. Above these units is a range of private and affordable flats. A private communal garden is at the centre of the block at first floor level, above the local energy centre, which is located to the rear of the ground floor retail and creative industry units. The block will be faced in a combination of primarily cement fibre panels, with elements of timber and metal detailing.
14  **Block 3** is a residential perimeter apartment block organised around a large communal garden at first floor, ranging in height from five to seven storeys and featuring both individual entrances to ground level flats and communal entrances to the residential units above. A new ‘play street’ loops around the block and connects at two points to Vanbrugh Hill. This block is faced primarily grey/blue terracotta bricks, with timber and metal detailing. Parking for 190 cars is provided below the communal garden, taking advantage of the natural rise of the land to avoid digging below ground, and includes car parking for Greenwich Centre staff.

[Image: View down the play street between blocks 3 and 4. Right: Maisonettes (block 4) on play street]

15  **Block 4** runs north-south along the east side of the play street; it features a terrace of 4-storey buildings which contain stacked 2-storey maisonettes with individual entrances on the street, private rear gardens and roof terraces. This block backs onto the rear gardens of the houses along Calvert Road to the east of the site. The elevations are designed to express the individual units with concrete or stone framing elements infilled with generous windows, timber and grey terracotta panels, and will highlight the shared staircases using a combined curtain wall and green wall feature.

16  **Block 5** comprises three groups of 3-storey private terraced townhouses which run east-west along the southern boundary of the site, wrap around the corner of Vanbrugh Hill and run up along the portion of the site with frontage on Calvert Road. Each house is a 4-bedroom house with a private back garden, and corresponds to the scale of surrounding residential streets; all of these units are private for market sale. These homes are faced primarily in brick and timber.

**Case history**

17  Prior to the site being purchased by English Partnerships and its inclusion within the London Wide Initiative programme, an outline planning application for this site was submitted to the Council by the NHS and referred to Mayor of London in 2003. No response was submitted to the Council from the Mayor, and the application was withdrawn prior to determination by the Council.

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

18  The relevant issues and corresponding policies are as follows:

- Regeneration and mix of uses  *London Plan; the Mayor’s Economic Development Strategy*
- Density and housing  *London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG*
• Affordable housing  
  London Plan; PPS3; Housing SPG

• Play space  
  London Plan; Providing for Children and Young People’s Play and Informal Recreation SPG

• Urban design  
  London Plan; PPS1

• Access  
  London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)

• Equal opportunities  
  London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)

• Sustainable development  
  London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG

19 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 2006 Greenwich Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

20 The following are also relevant material considerations:

• The Greenwich Council Core Strategy (Issues and Options Stage)
• The Greenwich Peninsula Development Framework, adopted in April 2002. The site is within the Greenwich Peninsula Opportunity Area, but is outside the boundaries of the site for which an outline consent masterplan for Greenwich Millennium Village, which has informed the approach to most of the sites within the Opportunity Area.

**Land use, regeneration and mix of uses**

21 The site is in the Greenwich Peninsula & Charlton Riverside West Opportunity Area, as set out in London Plan policy 2A.5. Development in this Opportunity Area is expected to maximise residential and non-residential densities and to contain an appropriate mix of uses. Between 2001 and 2026 the Opportunity Area is expected to deliver up to 7,500 jobs and 15,000 new homes. Development should seek to exceed minimum guidelines for housing while having regard for employment capacity. It should maximise access to public transport, promote social and economic inclusion, deliver good design and take account of environmental and community needs.

22 The London Plan identifies the potential for redevelopment to enhance the local environment in the wider Opportunity Area and identifies the former Greenwich District Hospital as one site which could accommodate further housing. The closure of the former hospital had reduced the level of economic activity on this part of the Woolwich Road. The Greenwich UDP establishes that the site is appropriate for a mixed-use proposal (site mu-26), where uses should complement and reinforce East Greenwich district centre, including retail and/or leisure along Woolwich Road and Vanbrugh Hill frontages, with residential acceptable to the rear to include a significant proportion of affordable housing.

23 The Greenwich Peninsula Development Framework recognises that the area surrounding the site currently does not provide the range and quality of shops and services needed to serve an integrated community, and seeks to introduce a new focus to the town centre with the redevelopment of the former hospital site. Improvements are sought to improve the pedestrian environment, maintain a stable mix of shops, enhance community facilities, and improve the public realm along Trafalgar and Woolwich Roads.
24 The Development Framework recognises that redevelopment of the site will provide an opportunity to reinforce community services, employment, and cohesion of the area, and sets out that priority will be given to the use of part of the site for community purposes. It also states that a mixed-use scheme would be appropriate provided that the existing health clinic is retained on site; activity appropriate to a town centre location is generated on the Woolwich Road frontage and the Vanburgh Hill frontage; the site is permeable to pedestrians and cyclists; and that public realm is made a focus of the scheme. It sets out that the proposal should include employment generation uses beyond that generated from the retail units, and that leisure use would be acceptable as part of the mix.

25 As set out in paragraph 11 the application proposes 11,091 square metres of community facilities including a health centre and leisure use, plus an additional 2,216 square metres of retail and creative industry space which would provide employment opportunities beyond retail. All of these uses are located to the north of the site, along the Woolwich Road, with the community uses focused on the northwest corner of the site. The proposal features a public square as the focus of the scheme and pedestrian-priority shared surface routes through the site, which improve the permeability and connectivity to the surrounding community.

26 Given the above considerations, the proposal to provide a mix of residential, retail, community and creative industry land uses on this site is acceptable in strategic planning policy terms.

Housing mix and density

27 London Plan Policy 3A.3 outlines the need for development proposals to achieve the highest possible intensity of use compatible with the local context, the design principles within Policy 4B.1 and with public transport capacity. Table 3A.2 of the London Plan provides guidelines on density in support of policies 3A.3 and 4B.1. Paragraph 3.23 provides definitions of the settings used within Table 3A.2.

28 The area is urban in nature with a public transport accessibility level of four, and in such cases the London Plan density matrix suggests a density guide of between 200 and 700 habitable rooms per hectare. The proposals include 645 residential units, which corresponds to a residential density of approximately 209 units per hectare, or 630 habitable rooms per hectare. Consequently the proposed density level is within the range set out in the London Plan density matrix table 4B.1 for developments locations such as this.

29 The proposed unit mix is as follows:

<table>
<thead>
<tr>
<th>Number of units</th>
<th>%</th>
<th>Target % (SPG)</th>
<th>over/under target?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom</td>
<td>223</td>
<td>35%</td>
<td>32%</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>235</td>
<td>36%</td>
<td></td>
</tr>
<tr>
<td>3 bedrooms</td>
<td>143</td>
<td>22%</td>
<td></td>
</tr>
<tr>
<td>2, 3 bedrooms</td>
<td>378</td>
<td>59%</td>
<td>38%</td>
</tr>
<tr>
<td>4 bedrooms</td>
<td>44</td>
<td>7%</td>
<td>30%</td>
</tr>
<tr>
<td>total family sized (3+ bedrooms)</td>
<td>187</td>
<td>29%</td>
<td></td>
</tr>
</tbody>
</table>

Table 1: Unit Mix

30 As indicated in the table above, the proposal exceeds the targets set out in the London Plan supplementary planning guidance on Housing for 2 and 3-bedroom units and falls short of
the targets for 4-bedroom units. However, the scheme does provide for a high proportion of family size (3-bedroom plus) units, providing 29% on a unit basis and 40% by floorspace.

31 This mix is provided in the context that this scheme is part of the English Partnerships London Wide Initiative programme, where a higher proportion of key worker housing is incorporated into a scheme to cross-subsidise the provision of affordable housing to a level of 50% (discussed below). Consequently the mix has been weighted towards maximising the provision of key worker units.

Affordable housing

32 The proposal comprises 645 residential units. London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

33 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The ‘Three Dragons’ development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

34 Schemes under English Partnerships’ London Wide Initiative (LWI) programme contain a significant proportion of shared equity units, in addition to traditional affordable housing and market provision. The proposal includes 324 ‘affordable’ units, representing 50% of the housing proposed. Of the 324 ‘affordable’ units, 24% are socially rented units, which will be captured within the section 106 agreement, and 26% are proposed as the London Wide Initiative shared equity intermediate units. The applicants have demonstrated that all tenures of affordable housing proposed accord with the affordability criteria within the London Plan and the Housing SPG. The financial information submitted as part of the application needs further exploration to ensure the maximum level of traditional affordable housing is being delivered within the section 106 agreement.

<table>
<thead>
<tr>
<th>Total (units)</th>
<th>Market/Private</th>
<th>Affordable</th>
<th>Social Rented</th>
<th>Intermediate</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom</td>
<td>223</td>
<td>95</td>
<td>128</td>
<td>53</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>235</td>
<td>111</td>
<td>124</td>
<td>60</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>143</td>
<td>73</td>
<td>70</td>
<td>40</td>
</tr>
<tr>
<td>4 bedroom</td>
<td>44</td>
<td>42</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>total</td>
<td>645</td>
<td>321</td>
<td>324</td>
<td>155</td>
</tr>
<tr>
<td>% of total</td>
<td></td>
<td>50%</td>
<td>50%</td>
<td>24%</td>
</tr>
<tr>
<td>% of affordable</td>
<td></td>
<td>48%</td>
<td>52%</td>
<td></td>
</tr>
</tbody>
</table>

Table 2: Tenure split

35 The provision of social rented accommodation is a strategic priority. The provision of additional intermediate units through the LWI programme delivers a 48:52 social rent to intermediate split, which does not reflect the objectives of the London Plan with regards to tenure
split, and which requires boroughs to take account of the London-wide objective for a 70:30 split, whilst seeking the maximum reasonable amount on individual sites.

36 It is acknowledged that the LWI programme aims to deliver a substantial amount of affordable homes through the delivery of shared equity units. This is a unique housing programme, which is in addition to traditional affordable housing delivery. The scheme meets the London-wide strategic target of 50% affordable housing, but the large proportion of LWI units results in a tenure ratio that is not consistent with the London Plan. The applicants have submitted a financial appraisal. This requires further scrutiny to ensure that the proportion of affordable housing, particularly social rented provision, is maximised within the s.106 agreement. However, given the unique nature of the LWI programme and the provision of a significant amount of affordable housing overall, it is acknowledged that the site will deliver a greater proportion of intermediate provision.

Children’s play space

37 London Plan Policy 3D.13 requires developments that include residential units to make provision for play and informal recreation. This should be predicated on the expected child population of the development, and an assessment of future need.

38 The applicants have submitted an estimated child occupancy rate of 382 children, using the methodology within the London Plan supplementary guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ and adding local data for children aged 16-18. The applicants suggest the age breakdown and amount of space required per age group in the table below are likely to be broken down into the following age groups:

<table>
<thead>
<tr>
<th>Age group</th>
<th>Number of children</th>
<th>Square metres needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-4</td>
<td>194</td>
<td>1,940</td>
</tr>
<tr>
<td>5-10</td>
<td>105</td>
<td>1,050</td>
</tr>
<tr>
<td>11-15</td>
<td>55</td>
<td>550</td>
</tr>
<tr>
<td>16+</td>
<td>27</td>
<td>270</td>
</tr>
<tr>
<td>Total</td>
<td>382</td>
<td>3,820</td>
</tr>
</tbody>
</table>

Table 3: Child population and playspace requirements

39 Greenwich Park is located within 600 metres walking distance from the development site and is a suitable resource for children over 11 years old. For younger children, there is some existing local provision, but analysis from the applicants suggests that play space provision for under 11s corresponding to approximately 0.3 hectares will have to be made on site.

40 Approximately 3,200 square metres of communal play space is provided in the communal gardens to block 2 and 3, whilst the proposal incorporates elements of play in the public realm including a shared ‘play street’ around block 3 and toddler play areas incorporated within part of the public square.

Urban design

41 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. Policy 4B.1 sets out overarching design principles for London and states that new developments should maximise site potential (with reference to meeting policy 3A.3 as well), enhance the public realm, provide a mix of uses, adhere to the principles of inclusive design, contribute to the adaptation to and mitigation of the effects of climate change, are legible,
sustainable, safe, inspiring, exciting and respect London’s natural and built heritage. Policies 4B.2, 3, and 5 provide further policy guidance and context for Policy 4B.1.

42 The proposal is considered by both GLA and Design for London officers as exceptionally well designed, particularly in comparison to other mixed use strategic developments of similar scale and programme. This proposal demonstrates that delivering high quality design can be viable.

Site layout and relationship to context

43 The design and development of the scheme has been developed in consultation with multiple stakeholders including Design for London, the Commission for Architecture and the Built Environment, and GLA officers. The proposals are of a very high standard of design quality, and have demonstrated a thorough analysis of the context and setting of the site to propose a scheme which sits comfortably and appropriately in its context. The proposals represent a significant change from the previous building on the site which was a single building with a large footprint and minimal permeability. This proposal introduces a street layout and approach to building form that knits the site back into the community and introduces a series of blocks and streets that are of a human scale.

Scale and massing

44 The building heights have been informed by the prevailing building heights surrounding the site, aiming to remain at a height that is lower than the former hospital, which rose to approximately 8 storeys. Consequently the proposals are six and seven storeys along the Woolwich Road, with reference to the height of the seven storey cinema building opposite the site at the corner of Vanbrugh Hill and Woolwich Road. The balance of the residential blocks are primarily three, four and five storeys, recognising the prevailing height of the residential terraces surrounding the site.

Residential quality

45 The applicants have sought to ensure that the quality and design of the residential accommodation is tenure-blind; all units are designed to meet ‘Lifetime Homes’ standards and the essential scheme development standards set by the Housing Corporation. All of the units for social rent will be designed to meet Parker Morris space standards, and have been sized with sufficient storage space.

46 Access to the flatted accommodation is multiple ‘cluster’ cores, generally with no more than six units accessed per floor off each core, and with corridor lengths minimised. Most flats are designed to be dual aspect: in some cases the smaller units achieve this by incorporating projecting or recessed building lines to create balconies, whilst larger units tend to be truly dual aspect. Townhouses all have their own front doors onto the street, whilst the stacked maisonettes have either their own front door onto the street or shared stair access with their neighbouring units.

47 All units benefit from their own private amenity space: flatted units have access to balconies and in some cases roof gardens, whilst townhouses all have private back gardens and the maisonettes have either back gardens, balconies and/or roof terraces.

External appearance

48 The design approach for the scheme aims to unify the five buildings whilst still allowing each to have its own unique identity and appearance, appropriate to the scale and typology of that building. A site-wide palette of high quality, robust materials has been selected, which allows sufficient variation to provide individuality to each block whilst ensuring complementarity
throughout the site. The materials proposed include timber, metal, London stock brick, terracotta grey/blue brick, and curtain wall glazing. Each building will use a maximum of three facing materials and will feature building-specific detailing.

49 The entrance to the Greenwich Centre is at the centre of the public square and courtyard and is visible from the junction of Vanbrugh Hill and Woolwich road. The entrance is highlighted by an oversized, undulating zinc canopy (or ‘wave’) which extends the length of the internal facade. The ground floor of the building is fully glazed with double height glazing on the corner to draw greater attention at the junction.

**Open space and public realm**

50 The applicants have thoroughly considered the open realm and public spaces proposed, and have provided a landscape strategy that introduces a hierarchy of multifunctional spaces of varying scales and character. The site masterplan has been structured around street alignments, with building blocks defined by the open spaces surrounding them. A clear distinction is made between private and public spaces, with streets being clearly public, and clear sightlines being provided into the centre of the site and desire lines considered in the design. The public square proposed at the centre of the Greenwich Centre block is intended to be a multi-use area that serves the residential, retail and community uses; the provision of lighting, seating, signage, soft and hard landscaping areas, and servicing have all been considered in the design of this space.

51 The residential street that loops around the mansion block is designed to be a ‘play street’, a street environment that gives priority to pedestrians with parallel car parking provided on either side of the street, traffic calming measures and soft planting and sculptural/intergal seating proposed to make the street a more hospitable amenity space. Street trees and enhanced pavement area are proposed along Woolwich Road. Half of the roof of block 3 is also proposed as a ‘community roof garden.’

52 The landscape and public realm design will be developed as part of a larger cultural and arts strategy for the site, drawing on the cultural heritage of East Greenwich. Components include the support of creative industries with specific space proposed within the development, events programming in the square and surrounding public realm, and public art within the site.

**Inclusive design**

53 London Plan Policy 4B.5 requires developments to meet the highest standards of accessibility and inclusion, and to include an access statement illustrating how the principles of inclusive design will be met. The applicants have submitted a comprehensive access statement showing how the development has been planned from the outset to be inclusive, with good potential for meeting the required access standards throughout. At the current stage of design, the proposals allow for key requirements for accessibility to be met, and the applicants intend to continue developing the design in discussion with appropriate parties to ensure the scheme meets the design aspiration of inclusive design throughout.

54 A significant (4 metre) change of level occurs over the site, with the level changes being absorbed into the landscape with gradients gentler than 1 in 20 throughout. The landscape and streetscape will be step-free, with planting and trees for navigation tools and regular rest points. As the nearest train stations do not benefit from step-free access, it is anticipated that most visitors with restricted mobility will use private vehicles or taxis. Consequently drop-off and set-down points have been identified at locations as near as possible to the entrance the Greenwich Centre.
55 The public facilities are all designed to Building Regulations Part M standards, including entrances, circulation, reception areas and means of escape. Although meeting Part M does not necessarily mean that the scheme is fully inclusive, the comprehensive access statement and use of an access consultant gives confidence that the provision should be adequate. An inclusive signage policy is to be developed, while the sports facilities are fully inclusive, designed to Sport England standards, where applicable.

56 London Plan Policy 3A.5 states that all new housing should be built to ‘Lifetime Homes’ standards and that 10% should be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The homes will be designed to meet the main principles of Lifetime Homes with the flats in blocks 1, 2, and 3 meeting all 16 standards; the maisonettes and townhouses will deviate slightly in that they will be designed to accommodate retro-fitting to achieve wheelchair standards if necessary.

57 The proposal includes 64 wheelchair accessible units across all tenures and housing typologies, providing 10% of the total residential provision of 645. The wheelchair standard requires that wheelchair user housing have car parking associated with it; however, the scheme offers approximately 24 blue badge spaces designated for residential use (16 in the underground car park and 8 on the street), resulting in a shortfall of approximately 40 blue badge spaces. The justification for this approach is based on a restricted car parking model, with all residential car parking to be distributed based on household size, i.e. all 3 bedroom and larger units will be allocated a car parking space. As a result, the Council has agreed a lower ratio of disabled parking spaces with the applicants, wherein all of the wheelchair units for social rent will be provided with a space and a more flexible approach is taken for market and shared ownership units.

58 Approximately 4 blue badge spaces will be provided for Greenwich Centre staff in the underground car park; two blue badge bays are provided near the Greenwich Centre at street level for visitors to the facilities in that block.

59 Given the shortfall in residential blue badge parking and limited visitor blue badge parking on the street, a condition should be included on the permission to ensure that the parking management plan includes a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced. Provision for blue badge parking needs for wheelchair users of blocks 1 or 2 is unclear and the applicants should provide clarification on this point.

**Sustainable design and construction**

60 Policy 4A.3 of the London Plan requires all development proposals to include a sustainability statement. In accordance with London Plan Policy, the application includes a sustainable design and construction statement which sets out that all of the essential standards and most of the preferred standards of sustainable design and construction will be met by the development and that a high standard of sustainability is targeted in all aspects of the development. The dwellings have all been designed to meet a minimum of Level 4 of the Code for Sustainable Homes, while the design of the Greenwich Centre will achieve a BREEAM Excellent rating (using the Bespoke BREEAM study).

61 Measures include the provision of water-efficient sanitary ware, rainwater harvesting and greywater collection and re-use, and site drainage systems. The roofs are integral to the proposed sustainable drainage systems; some will be either green or brown roofs for stormwater
attenuation and biodiversity value, whilst others will be designed to allow for rainwater harvesting.

62 The development aspires to recycle 97% of demolition waste and expects to meet the GLA’s domestic recycling target of 60% for 2016 on the first day of occupation. The project will use a green procurement process for building materials; intends to use modern methods of construction wherever possible. Green travel measures include a high number of secure and covered cycle parking spaces, automatic registration to car club for all residents, electric charging points, and a limited number of car parking spaces.

Energy

63 The London Plan climate change policies as set out in chapter 4A 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 final building design offers flexibility for change of use, thermally massive construction, passive design techniques and a range of sustainable drainage solutions that all anticipate the conditions of a changing climate.

64 The applicants have applied the London Plan energy hierarchy to the development and are aiming to deliver a net zero carbon development through the use of a biomass gasification plant with Combined Heat and Power (CHP). Although the initiative is very welcomed, questions remain around the deliverability of this relatively unproven and new technology. Hence, whilst supporting the energy strategy’s use of this technology option, the applicants are asked to also provide an alternative energy strategy for the whole site based on gas-fired CHP and complementary renewable energy technologies, which should be implemented in case the biomass CHP strategy proves undeliverable.

Be lean: energy demand assessment and energy efficiency (Policy 4A.2 and 4A.4)

65 The applicants state that modelling work has been conducted to establish the baseline emissions of the dwellings. A range of energy efficient design measures are proposed that will take the CO₂ emissions of the residential element of the development 17.5% beyond Building Regulations 2006. The applicants should provide modelling summary worksheets that demonstrate the modelling work undertaken and the levels of savings achieved. For the non-residential element, a 10% CO₂ saving from energy efficient design has been estimated. These savings need to be demonstrated through appropriate modelling.

Be clean: decentralised energy (Policies 4A.5 and 4A.6)

66 A site-wide heating distribution network has been proposed to supply the entire space heating and domestic hot water requirements of the residential units and non-domestic energy usages. A single energy centre housing all the different types of plant equipment proposed will supply the heating distribution network. Both of these measures are to be welcomed. It is recommended that specific clauses related to the delivery of both the site-wide heating distribution network and the single energy centre are included in the section 106 agreement.

67 A biomass gasification plant with CHP is proposed. Woodchips will be supplied to the gasification plant twice daily and the synthetic gas produced from this process will be fed into three 250kWe CHP engines to produce heat and electricity for the site. The applicants are in the process of negotiating a contract with an energy services company (ESCO) for the delivery of the scheme. Although the selected ESCO will have final say over the exact biomass fuel to be used and the specific gasification/CHP technology, it is being required by the applicants to
deliver a net zero carbon emissions development. Information on the potential gasification technology and CHP engine to be utilised along with details of the proposed fuel supply chain for this site would be helpful.

**Be green: renewable energy (Policy 4A.7)**

68 The applicants are aiming for 100% CO₂ savings from renewable energy technology on-site, specifically biomass gasification plant with CHP. This is welcomed but in light of the comments above about the relatively untested and new nature of the technology in the UK, an alternative renewable energy proposal is required, which would complement a gas-fired CHP.

**Transport for London comments**

69 The proposed level of parking for the site (0.32 spaces per residential unit) is in line with London Plan standards and therefore acceptable. However, in order to encourage increased take up of the City Car Club provision on site, TfL strongly recommends reducing this level even further. Extending existing parking restrictions by providing controlled parking zone (CPZ) permits to all residential units should be further investigated.

70 In order for TfL to accept the assumptions presented in the transport assessment (TA) report in relation to trip generation and modal split assessment, confirmation should be provided that the leisure and health centres, library and council services facilities will be of the same scale as those they are replacing and that re-distribution of trips, both vehicular and pedestrian, has been taken into account. Given that the site is now vacant, TfL considers that trip generation figures taken from the previous site use should not be referred to when assessing the impact of the proposed development.

71 Should this application be granted planning permission, the applicants and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act (TMA) 2004. Formal notifications and approval will be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

72 Although the description of the pedestrian environment within the development appears vague from the TA, it is understood that cyclists and pedestrians have been given key priority as part of the proposals, which is welcomed. TfL requests confirmation that all pedestrian crossings within the vicinity of the site comply with BV165 standards, and that all footways are level and free of street clutter, trip hazards and ponding issues.

73 The TA provides a good description of cycle routes in the vicinity of the site with a useful map of the local network. It is noted from this map that a cycle route runs past the site on Woolwich Road, and TfL would therefore expect the applicants to look at linking directly this existing facility into and through the development. The provision of 920 cycle parking spaces for the residential units meets TfL’s cycle parking standards as is the allocation of secure and sheltered cycle parking for each block in the development.

74 The proposal to access/egress to the site via Vanbrugh Hill is supported as this is considered to be a less important bus corridor that the A206 Woolwich Road. In order to reduce the impact on Woolwich Road, TfL also supports the exit onto the northern side of the site to Woolwich Road which allows left turn manoeuvres only and is dedicated to disabled and services vehicles. Signage to guide pedestrians towards bus stops, along with information on service availability and real time information at each stop, should also be provided.
With regards to the proposals for bus stop relocation on Woolwich Road, TfL’s preference is for the route 422 stop to be moved east of the stop for routes 129, 177, 180 and 286. Of the two options presented, Option 2 showing both stops located west of the proposed disabled/servicing exit is also preferred, as this would improve left-turning drivers’ visibility of approaching traffic from the east.

TfL requests that all bus stop improvements be provided by the applicants and be covered through the section 106 agreement. All new bus stops should be fully accessible and comply with TfL’s standards, particularly in relation to accessibility requirements. In the absence of any bus stop audit, a contribution of £20,000 per pair of stops is commonly required by TfL to achieve their full upgrade. A £50,000 contribution is therefore requested to upgrade the five stops on Vanbrugh Hill and on Woolwich Road.

TfL supports the references made in the TA to Greenwich Waterfront Transit (GWT). The Phase 3 alignment is currently proposed to run between North Greenwich station and Greenwich town centre, and is therefore within immediate vicinity of the proposed site. Although the future status of this phase is still subject to the outcomes of the Thames Gateway Transit Option Review undertaken by TfL and expected later this year, TfL strongly encourages that a contribution be provided towards its delivery, as previously secured from numerous neighbouring development sites.

In terms of servicing and deliveries, TfL is pleased to see that the TA appears to match the objectives outlined in the London Freight Plan and that subsequent provisions for the residential and commercial premises appear to be adequate. Special consideration should, however, be given in the travel planning process to the creative industry units and the microbrewery which will have different delivery needs owing to their specialist nature.

Production of a travel plan framework for the development including commitment to use on-site occupation to develop individual travel plans for the different elements of the development is supported. This should be secured through the section 106 agreement or condition if that is possible. Given that the framework is thorough and identifies some good initiatives to promote walking and cycling, TfL considers that there will be opportunities to link into other town centre developments. When developing the travel plan, the applicants are reminded that firm SMART (specific, measurable, achievable, realistic and time-bound) targets will be required and that monitoring will have accord to TfL’s requirements.

Supplementary information has recently been received from the applicants in order to address TfL’s above concerns. This is currently under review and TfL will respond to the applicants in due course once this additional package of information has been considered.

**London Development Agency comments**

The LDA welcomes the principle of the proposed development as contributing to the objectives of the Economic Development Strategy and the relevant policies within the London Plan.

The LDA welcomes the commercial floorspace provision for the creative industry sector. Policy 3B.2 of the London Plan states that the provision of a variety of type, size and cost of office premises to meet the needs of all sectors will be sought. The LDA encourages the Council to ensure that an appropriate mechanism is in place to safeguard these intentions, within the section 106 agreement. These could include:

- A minimum floorspace to be used as studio workshops.
• A maximum floorspace that can be leased to any one organisation/business.
• A targeted marketing of units through local agents, council website, Arts Council website and specialist press for the creative industries sector.
• Capping of rental rates for a specified number of years.

83 A major issue for start-ups and small businesses is the availability of affordable premises. This could be facilitated by developer subsidy through a mediator such as the Council, or capping of rents over a defined period. A definition of affordability should also take into account potential service charges.

84 Policy 3A.18 of the London Plan requires the adequate provision of social infrastructure. The LDA welcomes the provision of community facilities on site, but encourages the Council to consider any additional needs resulting from the proposed development.

85 Policy 3B.11 of the London Plan aims to improve the skills and employment opportunities for Londoners. The LDA welcomes the applicants’ commitment to recruiting and training local people through on-site construction training, and working closely with Greenwich Local Labour and Business (GLLaB). Local residents and businesses should benefit from the creation of jobs resulting from the construction and operational phases of the development. Initiatives to create training and employment opportunities and to utilise the goods and services of small and medium enterprises and local businesses could be formalised through a section 106 agreement between the applicants and the Council. An employment and training strategy should cover the following elements:

• Timing and arrangements for its implementation including funding arrangements.
• A stakeholder charter to ensure initial and subsequent employers within the completed development participate in the implementation of the strategy.
• Minimum local recruitment targets for employees and targets for the involvement of local businesses and measures to be undertaken by the applicants to meet with these targets.
• Periodical workforce and business monitoring and reporting of the results to the Council and such other parties as may be set out in the approved strategy.
• A programme for skills training for local residents and/or businesses, including the potential for the provision of suitably equipped training premises.
• Local publicity, awareness raising proposals and methods for advertising employment opportunities and impending contracts which includes:
  - Initiatives to promote the involvement of local businesses including sub-contracting and the supply of goods and services.
  - Initiatives to promote the employment of small and medium businesses.
  - Initiatives to promote the employment of black and ethnic minority owned businesses.

86 The delivery of such initiatives will assist in ensuring the regeneration benefits of the proposed development are maximised for local residents, and that the objective to tackle barriers to employment set out in the Economic Development Strategy is met.

Local planning authority’s position

87 The Council is due to determine this application at its Planning Committee in late June.
Legal considerations

88 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Greenwich Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. 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 comments unless specifically stated.

Financial considerations

89 There are no financial considerations at this stage.

Conclusion

90 The proposal to provide a mix of residential, retail, community and creative industry land uses on this site is acceptable in strategic planning policy terms.

91 The proposal is a high quality scheme that will help meet the aspiration of regenerating East Greenwich town centre. The design is well considered and demonstrates the viability of providing high density, sustainable scheme of excellent design quality.

92 There are a number of issues that will need to be addressed in more detail before this scheme is returned to the Mayor. Further information is required relating to the renewable energy strategy, blue badge parking arrangements, transportation modelling, and the provision of a local employment and training strategy.

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