VIP Trading Estate, Charlton Riverside  
in the Royal Borough of Greenwich  
planning application no. 16/4008/F

### Strategic planning application stage 1 referral

### The proposal
Demolition of existing buildings and construction of 9 buildings ranging from 2 to 28-storeys in height for 975 units for residential use, with Class B1 employment space and flexible uses comprising Class A1 (retail), Class A3 (Cafe/Restaurant), Class D1 (Community Use) and Class D2 (Leisure) at ground floor and first floor level, alterations to existing vehicular access and creation of new pedestrian access from Hope and Anchor Lane and the riverside, creation of new areas of open space and landscaping together with the provision of associated car parking, cycle space, refuse and recycling storage, plant and all other associated works.

### The applicant
The applicant is Rockwell Residential, and the architect is SimpsonHaugh and Partners.

### Strategic issues

**Principle of development:** The principle of the residential-led, mixed-use development of this site that will deliver a significant quantum of new homes within the Charlton Riverside Opportunity Area is supported in principle. Further clarification on the existing and proposed employment density is required (paragraphs 21 to 23).

**Affordable housing:** 143 units, or 16% on a habitable room basis, 72:28 affordable: intermediate. This is not acceptable. GLA officers will robustly interrogate the viability with the Council and the applicant to ensure that the maximum reasonable amount of affordable housing is delivered. Officer’s currently seeking clarity on affordability (paragraphs 25 to 26). During pre-application it has been made clear to the applicant that a scheme of this density should deliver at least 35% affordable housing.

**Urban design:** The general layout is supported and aligns with principles to improve wider connectivity and permeability across the masterplan area. The applicant should revise the proposed scale and massing of the taller elements in response to concerns over impacts on overall design quality and proposed amenity spaces (paragraphs 34 to 40).

Further revisions and discussion is sought with respect to the above-mentioned points, and others associated with housing (paragraphs 28 to 33), urban design (paragraphs 34 to 40), inclusive design (paragraph 41 to 42), sustainability (paragraph 43 to 44) and transport (paragraphs 46 to 50).

### Recommendation
That Greenwich Council be advised that while the principle of development is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 55 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.
Context

On 11 January 2017 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 21 February 2017 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

The application is referable under categories 1A, 1B and 1C 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(c)** – Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside of 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 more than 30 metres high outside the City of London.”

Once Greenwich Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

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

Site description

The 2.5 hectare site is located within the Charlton Riverside area of the Royal Borough of Greenwich. The site sits within a predominantly industrial area located between Woolwich Road and the southern bank of the River Thames, close to the Thames Barrier. The main access to the site is from Hope & Anchor Lane which runs north from Woolwich Road, or via Bugsby’s Way which runs east to west, from the sites western edge.

The site is irregular in shape and mainly consists of two main areas, referred to as Plot A and Plot B. Plot A is the northern-most plot and is bound by commercial/industrial units to the north, east and south, and residential properties at Atlas & Derrick Gardens to the west. A small access strip extends west from this plot, between the residential properties connecting the site to Anchor & Hope Lane. The plot is currently in a mix of commercial, industrial and Sui Generis uses and comprises three large three storey buildings and associated hardstanding. Plot B sits to the south and is bounded by Atlas & Derrick Gardens to the north, commercial/industrial units to the south and east, and Anchor & Hope Lane to the west. A van hire company currently operates from the two storey building which occupies the site.
The surrounding area comprises various active industrial uses, including a large Sainsbury’s distribution centre and the safeguarded Angersteins Wharf to the north-west. The portion of land immediately adjacent to the site to the west is designated as a Strategic Industrial Location.

At the strategic planning scale, the site forms part of the wider Charlton Riverside Opportunity Area (OA) which has the potential to deliver 1,000 jobs and a minimum of 3,500 new homes and recognises the opportunity for development to complement the opportunities at Deptford/Greenwich, Greenwich Peninsula and Woolwich. The OA also recognises the Strategic Industrial Location designation of parts of wider site and the safeguarded wharfs such as Murphy’s and Angerstein with its strategic railhead.

At the local level, the Council’s Core Strategy identifies the site as part of the Charlton Riverside Strategic Development Location which reflects the OA status through its redevelopment aspirations to deliver an attractive and vibrant mixed use urban quarter providing between 3,500 to 5,000 new homes. The Council adopted a Supplementary Planning Document (SPD) for the site in 2012, however, this is being revisited by the Council and a new masterplan SPD is currently being developed. A draft was published for consultation on 17 February 2017 and GLA officers are currently reviewing the content. The site is also within the Thames Policy Area and Flood Risk Zone 3.

Details of the proposal

The proposals are for the demolition of the existing buildings and development of the site to provide a residential-led mixed-use scheme comprising approximately 975 new homes of differing typologies, 1,560 sq.m. of office space (Class B1), 690 sq.m. of flexible retail/restaurant/cafe/leisure uses (Class A1/A3), 407 sq.m. of community uses (Class D1/D2), ancillary residential facilities and public realm and landscape improvements. The development includes nine buildings ranging from two to 28 storeys in height.

Case history

The applicant engaged in initial pre-application discussions with GLA officers in November 2015 where discussions concluded that the residential-led, mixed-use redevelopment of this site within the Charlton Riverside Opportunity Area could be supported in principle, but that GLA officers required a further understanding of the principles to be established within Council’s review of the adopted SPD (2012) in order to be able to appropriately assess the proposals within the changing land use and urban design context. The applicant was strongly encouraged to engage with the Council to ensure the proposals developed in a cohesive manner. and welcomed continued dialogue with the applicant as the development progresses further.

Following a series of further pre-application meetings with the applicant throughout 2016 to discuss revisions to the design and layout in response to emerging masterplan principles and officer comments, GLA officers issued further formal pre-application advice in November 2016 setting out that the detailed design of the scheme had evolved positively in response to previous advice from GLA officers and sought, further engagement on the affordable housing offer and energy strategy, as well as further work to address various transport matters.
Strategic planning issues and relevant policies and guidance

14 The relevant strategic issues and corresponding policies are as follows:

- **Principle of development**
  - London Plan

- **Housing & affordable housing**
  - London Plan; Housing SPG; Housing Strategy; Draft Affordable Housing & Viability SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;

- **Urban design**
  - London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG; Accessible London: achieving an inclusive environment SPG;

- **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;

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

- **Ambient noise**
  - London Plan; the Mayor’s Ambient Noise Strategy;

- **Air quality**
  - London Plan; the Mayor’s Air Quality Strategy;

- **Safeguarded wharves**


**Principle of development**

Charlton Riverside masterplan

17 The currently adopted Charlton Riverside Masterplan SPD (2012) sets out a spatial strategy and the key design principles to guide the regeneration of the Charlton Riverside Opportunity Area, with the vision of creating a new mixed-use urban quarter. The document identifies the application site as predominantly within a zone suitable for residential development. The Council is currently in the process of comprehensively reviewing the 2012 SPD and GLA officers have been engaged with the Council as part of this review process although a full draft has not been shared. A consultation draft revised masterplan (2017) was recently published for comment on 17 February 2017 and officers are currently reviewing its content. Given the limited amount of time, officers have sought to consider the application in the emerging policy context where possible.

18 In order to achieve the strategic and local regeneration aspirations set out in adopted and emerging policy, it is recognised that the area will need a comprehensive and integrated approach to development and individual sites will be required to demonstrate how proposals fit with the emerging masterplan principles, or the assumptions that have been used for the wider area. Given
the site’s central location in the masterplan area and that this scheme is likely to be the first to come forward and may act as a potential catalyst for wider regeneration, it is critical that the proposals respond positively to the emerging guidance and do not prejudice the redevelopment of the wider Opportunity Area in order to avoid piecemeal development without plans for delivering necessary infrastructure.

19 As set out above, the consultation draft of the revised masterplan has only very recently been published and sets out the following key objectives for Charlton Riverside. These are to provide residential diversity; economic activity; improved connectivity, permeability and accessibility; appropriate social infrastructure delivery to meet changing needs of community; well-designed buildings and public spaces that respond to topography and character; to be sustainable and resilient and a viable and deliverable. Overall, the revised masterplan seeks to deliver an additional 5,000 – 7,500 new homes in low to medium rise development, of which 50% should be family housing and 35% affordable housing, in addition to an extra 4,000 jobs over and above existing employment levels.

20 Given the proposals were being developed ahead of the masterplan review process, the applicant has engaged in pre-application discussions with the Council to try and gain an understanding of the key principles that would underpin the revised document to help inform the proposals. These included improved transport links, increased east-west and north-south permeability, the distribution of uses throughout the wider masterplan area and the public realm/green space network. As set out within the following report, through positive pre-application engagement with officers and subsequent revisions, the proposed uses and broad layout will not prejudice the delivery of the key objectives outlined in the draft revised masterplan SPD and in addition to delivering a substantial quantum of new homes, will help deliver the first section of a new principle east-west link through the masterplan area, in addition to secondary east-west and north-south routes and significant amounts of new public realm.

Mix of uses

21 Notwithstanding the above, the delivery of 975 new homes on the site would make a significant contribution to the strategic and local housing delivery aspirations of the Opportunity Area, and draft revised masterplan SPD and is supported in accordance with London Plan policies 2.13, 3.3 and 3.4. However, it is important to note that another key aspect of London’s Opportunity Areas is the promotion of job growth. Greenwich Core Strategy Policy EA2 sets out that employment space in Charlton Riverside will be consolidated to maximise the efficient use of land to address strategic and local objectives, whilst maintaining employment levels in the area, in addition to facilitating a change in the type of employment. This is also reflected in the employment aspirations of the draft revised masterplan SPD which seeks to deliver an additional 4,000 jobs over and above the existing employment levels by integrating employment into new developments.

22 The proposals will result in a net loss of employment floorspace on the site and the requirement for the existing industrial uses to relocate. The applicant has set out that the current uses could relocate to the nearby Strategic Industrial Location (SIL) to the east and west of the masterplan area, where there is sufficient supply of suitable accommodation; however, further detail on the proposed relocation strategy for these businesses is required. Employment generating uses will be reprovided on site in the form of four ground floor B1 office units within Plot A, in addition to a small quantum of flexible retail uses aimed at meeting the needs of new and local residents. In recognition of the requirement to consolidate existing employment floorspace, this is supported in principle, subject to the satisfactory relocation of the existing uses, and reflects the aspirations to deliver new types of employment within Charlton Riverside. The applicant should however; provide employment density calculations for the proposed employment floorspace to demonstrate the development’s contribution to job growth in the Opportunity Area.
application should also look to increase the total floorspace for employment use and look to provide spaces which offer greater flexibility to accommodate other commercial uses rather than limiting to office type uses, suitable to the needs of SME’s in order to build upon the existing diverse employment characteristics of the area and the objectives of the revised SPD. The applicant should also consider the provision of affordable workspace within the scheme.

23 In addition to the above, the provision of a small crèche and healthcare facility as part of the proposed mix of uses is strongly supported in accordance with London Plan Policy 3.16.

Housing

24 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 26,850 homes in the Plan period 2015-2025. The principle of providing housing as part of the mixed-use redevelopment of this site, to include 975 new homes, including one, two, three and four bed units including duplexes and town houses is therefore supported.

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Private</th>
<th>Intermediate</th>
<th>Affordable</th>
<th>Unit mix</th>
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<td>0</td>
<td>3</td>
<td>17.2 %</td>
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<tr>
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<td>188</td>
<td>21</td>
<td>18</td>
<td>23.3 %</td>
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<tr>
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<td>31.4 %</td>
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<td>Four bed</td>
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<td>11</td>
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<tr>
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<td><strong>832</strong></td>
<td><strong>40</strong></td>
<td><strong>103</strong></td>
<td><strong>100 %</strong></td>
</tr>
</tbody>
</table>

Affordable housing

25 At the strategic level, London Plan Policy 3.11 seeks to maximise affordable housing provision in London. At the local level, Greenwich Council Core Strategy Policy H3 requires a minimum of 35% affordable homes to be provided on sites delivering more than ten residential units and as set out during pre-application discussions and given the quantum of residential development proposed, the proposals are expected to accord fully with the local policy target, and to ensure affordable housing is maximised. As set out in the table above, the development proposes 143 affordable dwellings, which equates to 16% affordable housing on a habitable room basis, which is significantly below the local policy target. It is proposed that 72% of the affordable units will be social rented and 28% will be intermediate which is in line with the Council’s preferred tenure split of 70:30 social housing to intermediate and is accepted. GLA officers are currently seeking clarity on the proposed discount levels and income thresholds for the affordable elements and will update the Mayor when this information is made available.
26 The applicant has submitted a financial viability appraisal (FVA) to support the current offer which sets out that the a locally policy compliant quantum of affordable housing would generate a profit margin significantly below a level which would incentivise a willing landowner to redevelop this site and would therefore not be financially viable at this level. Through further testing the applicant has set out the proposed offer of 16% is the maximum reasonable level of affordable housing that can be delivered whilst generating an acceptable level of profit that would bring the site forward. The FVA has been provided to the Council and GLA officers for review, and is currently subject to rigorous testing with the all key appraisal inputs to be scrutinised including: benchmark land value; developer profit margin (relative to scheme risk); build costs; assumptions regarding rental levels and, sales values. However, based on the information currently available to GLA officers and the quantum of residential development proposed, the current affordable housing offer is unacceptable and officers will work with the applicant and the Council to ensure that the maximum reasonable amount of affordable housing is delivered in accordance with London Plan Policy 3.12 and the requirements of the draft Affordable Housing and Viability SPG. Officers have made clear throughout the pre-application process that they would expect at least 35% affordable housing to be delivered on the site.

**Housing choice**

27 London Plan Policy 3.8, together with the Mayor’s Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The scheme would offer a range of unit types (from studio to four-bedroom flats and duplexes) and it is noted that 46% of the social rented units would be three or four bedroom units which is welcomed.

**Residential quality**

28 All of the units will meet and exceed the Mayor’s minimum space standards, will have clear floor to ceiling heights of 2.5 metres, and will have access to private outdoor amenity space in the form of a balcony, loggia, roof terrace or garden. The provision of duplex units and townhouses will maximise the provision of individual private residential entrances accessed directly from the public realm helping to activate key, park-facing frontages throughout the site and to create a residential character to these spaces. The residential layouts have sought to maximise dual aspect units where possible and there are no north-facing, single aspect units. The generous number of residential cores helps to reduce the number of units sharing circulation spaces in line with the best practice guidance in the SPG. This is strongly supported and overall, the development demonstrates a high level of residential quality and generally accords with the guidance set out in the Housing SPG. Notwithstanding this, the applicant should carry out an ADF analysis for the deep through units to confirm that they will receive sufficient levels of daylight/sunlight.

29 The applicant has carried out noise and air quality assessments which conclude that the completed development would not result in any significant increase in exposure to air pollution to any identified existing or new sensitive residential receptors and that suitable levels of noise could be met through appropriate design. While it is recognised that there are strategic and local aspirations for significant land use changes at Charlton Riverside, given the current industrial nature of the surrounding sites and the relative proximity of Angerstein Wharf, and that this is likely to be the first site to come forward for large scale residential use, further detailed information is required to satisfactorily demonstrate how the proposed development will successfully manage any potential land use conflicts with adjacent sites and deliver a high quality residential environment. Any proposed air quality and noise mitigation should be secured by planning condition.
Children’s play space

30  London Plan Policy 3.6 seeks to ensure that developments provide access to inclusive, accessible and safe spaces, offering high-quality play and informal recreation opportunities. Further detail is provided in the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG. The development will deliver a total of 3,866 sq.m. of play space throughout the landscaped areas, roof top terraces and podium gardens which will include informal playable features and activity stations with outdoor gym equipment addressing the requirements of the target age groups in the SPG. The proposed swimming pool and gym facilities will also contribute towards the recreational needs of older residents. The overall provision exceeds the minimum requirements set out within the guidance which is strongly supported and will help provide a potentially high quality residential environment for future residents of the development and GLA officers are content that the proposals are capable of meeting the requirements of London Plan Policy 3.6 and the Play and Informal Recreation SPG. However, as set out in the design section below, the proposed taller elements have the potential to overshadow a number of the amenity spaces and this should be addressed to ensure high quality amenity space is delivered.

Residential density

31  Given the characteristics of the site, the public transport accessibility level (PTAL) of two to four, and its urban location, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density of between 200 to 700 habitable rooms per hectare (hr/ha) for this development. The proposed density for the development is 1,121 hr/ha.

32  As set out during pre-application discussions, it is acknowledged that the density ranges recommended in Table 3.2 of the London Plan should not be applied mechanistically and that PTAL alone is not an appropriate measurement to inform residential density. It is also important to acknowledge that the site is within an identified Opportunity Area and is therefore a location where residential output and densities should be optimised and one where development proposals should contribute towards meeting, or where appropriate, exceeding the minimum guidelines for housing, in accordance with London Plan Policy 2.13.

33  Nevertheless, in accordance with paragraph 1.3.41 of the Mayor’s Housing SPG, in order to be acceptable any development will need to be of the highest standards of design and provide high quality residential accommodation that is well designed, and delivers an appropriate mix of units, including affordable housing, with sufficient play and amenity space. As set out in paragraphs 28 and 30, the scheme has the potential to deliver a high level of residential quality with a generous quantum of public open space and amenity. Furthermore, the proposed ground floor uses will help activate all key frontages, animating new public routes through the site, whilst meeting local convenience and increased community infrastructure needs. In this context, subject to the successful management of any potential land use conflicts with neighbouring sites, the principle of a high-density development in this location is supported. However, as set out below, the current proposed scale and massing has the potential to detrimentally impact on the overall quality of the development and the development potential of adjacent sites and this should be revised. All of these issues will need to be addressed before the density can be considered acceptable.

Urban design

34  A full consultation draft of the revised masterplan SPD has not been available to the applicant or GLA officers throughout pre-application discussions, although GLA officers have been periodically briefed by the Council on progress and emerging objectives which has helped inform officer level discussions with the applicant to date. The applicant has also engaged with the Council to seek clarity on its aspirations. As a result, the proposed uses and layout will not prejudice the delivery of the key design and regeneration objectives set out in the draft SPD, and in addition to
delivering a significant quantum of new homes, will help deliver the first section of a new principle east-west link through the site, in addition to a secondary east-west and north-south routes and generous amounts of new public realm.

35 Overall, the applicant has responded positively to the feedback provided throughout the pre-application process and as a result GLA officers are generally supportive of the overall layout. The location of the majority of servicing requirements within a podium on Plot B, wrapped by active uses including residential, retail and community uses will help animate the surrounding street network. However, the southern part of Yarn Lane, at the base of the tower, is dominated by the servicing road and the applicant should rationalise this where possible to ensure that the tall building responds positively to the street and the future development context of the adjacent sites. Notwithstanding this, the location of retail, café/restaurant uses the health centre with associated swimming pool along Anchor & Hope Lane and Mirfield Street reflect the masterplan aspirations to create a Neighbourhood Centre in this area.

36 The continuation of Anchor & Hope Path through the landscaped gardens of Plot A linking Anchor & Hope Lane to Rope Path will help increase pedestrian permeability through this site and the wider masterplan area. This route also aligns with the secondary/tertiary movement networks proposed by the draft masterplan which is welcomed. The applicant should explore privacy measures to ensure that the southern frontage of the broken townhouse block does not become a blank frontage and provide further images to demonstrate how this will be achieved.

37 The applicant has sought to maximise active uses on to the landscaped areas and street facing edges on the northern site, however, it should ensure that the southern elevation of the townhouses on Plot A that front onto Mirfield Way are well articulated and provide overlooking to this portion of a new key east-west route. This should be supported by further street-level views in this area. In addition, it is likely that Mirfield Street will be heavily trafficked given the importance of the new east-west route for the wider masterplan, and the applicant should demonstrate how safe pedestrian access with generous pavement widths will be provided across the full extent of this route, in addition to providing clarity on the delivery of those public realm/landscaping improvements indicated between Mirfield Street and Atlas Gardens which falls outside of the redline boundary.

38 With regards to the proposed height and massing, the stepping down of the building heights towards Atlas & Derrick Gardens is supported and in particular the proposed townhouse block creates a sympathetic relationship that helps to mediate between the existing, traditional low-rise residential buildings and the proposed larger scale modern development towards on Plot A. However, officers raise some concern with regards to the overall quantum of development proposed on Plot A and the impact the resultant massing could have on the quality of the generous amenity spaces proposed. While the varied massing to the eastern linear block is supported, the applicant should reduce building AES by at least three stories in height as this creates an awkward townscape relationship with the adjacent pavilion building. In addition, the spaces between Building A1 and AWN appear relatively narrow given the scale of buildings proposed and further daylight/sunlight information should be provided to demonstrate that the podium buildings will not negatively impact the residential quality of these units, and the overall quality of the proposed communal gardens. The applicant should also revisit the design of the podium buildings to create more slender and elegant forms which would in turn create a greater sense of space and openness within the gardens.

39 With regards to Plot B, similar concerns are raised with regards to the impact the proposed 28 storey tower may have on the quality of the podium courtyard space, particularly given its projected massing which will overhang the children’s play space on the podium garden and western part of Yarn Lane which has the potential to prejudice the development potential of the site to the south. In addition, the glazed tiers on the top of building B-East should be removed to further help
mediate the scale of development in this part of the site its potential impact on the adjacent site which may come forward for development in the future.

40 Overall, while it is recognised that there is a rationale for providing a taller building on Plot B to mark the neighbourhood centre and the future key east-west route proposed by the draft masterplan, further justification for the proposed scale of development is required as this is significantly taller than the local and wider context. Furthermore, as set out in London Plan Policy 7.7 which acknowledges that opportunity areas may be appropriate locations for tall buildings, in order for them to be acceptable tall buildings should relate positively to their context and surrounding streets, improve legibility and permeability, be of the highest standards of architecture and make a significant contribution towards local regeneration. As set out above, the proposed scale and massing of some of the taller elements have the potential to detrimentally impact the overall quality of the scheme and should be reconsidered in the context of the wider design issues set out above.

Inclusive design

41 The applicant has committed to designing 10% of the residential units to Building Regulation standard M4(3) standards, with the remaining 90% designed to Building Regulation standard M4 (2). These should be distributed across all unit sizes and tenures and be secured by planning condition. The applicant has provided an access statement demonstrated how inclusive design has been considered throughout the design process and how the development will ensure that the proposed landscape and both the non-residential and residential uses will be accessible by all. Some concerns are raised with regards to proposed pedestrian bridges across small water features and further information is required to demonstrate how these features will be safe and navigable by wheelchair users and people with visual impairments. Notwithstanding this, the proposed strategy is generally supported and the Council should ensure these commitments are carried through to the detailed design stages and secured by condition.

42 A total of 59 blue badge residential parking spaces, in addition to one space per employee for the commercial will be provided. The applicant should increase the number of blue badge parking bays available to residents in line with the policy requirement of one space per wheelchair accessible unit (98 spaces) and ensure that the allocation of these bays is actively managed to ensure that they are always available to those in greatest need through a car parking management plan, to be secured by planning condition.

Sustainable development

Energy strategy

43 In accordance with the principles of Policy 5.2 the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (comprising a range of passive design features, demand reduction measures and a building management system); a communal heat network powered by a combined heat and power (CHP) unit that is designed for future connection to a district heat network; and, renewable technologies (photovoltaic panels). Based on the strategy proposed the scheme would achieve a 53% reduction in carbon dioxide for the domestic elements and a 43% reduction in carbon emissions for the non-domestic elements compared to 2013 Building Regulations compliant development which exceeds the London Plan policy targets. However, as summarised below, GLA officers require further information to verify the savings claimed and full technical details have been issued directly to the Council and applicant.
44 The applicant should confirm the proposed construction type and explain how the challenging performance levels set out in the supporting strategy will be achieved, in addition to outlining how the cooling demand will be reduced in the non-domestic spaces. Further passive measures should be explored to reduce the risk of overheating to an acceptable level and the applicant should clarify if there are any potential ventilation restrictions given the industrial context. With regards to the site heat network, the applicant should provide further details on the size and location of the energy centre and that all domestic and non-domestic uses will be connected, in addition to further CHP capacity analysis. Finally, details on the proposed photovoltaic panel installation should be provided.

Flood risk and drainage

45 The proposals have taken an appropriate risk based approach to the unlikely event of serious flooding at the site. However, given the potentially serious implications of a breach in defences, the applicant should clarify the specific flood warning safety measures for the basement area over and above the basic EA Flood Warning service; the safeguarding measures for essential building utilities in a flood event; and the use of flood resilient materials that would limit damage or enable a quick recovery. In addition, the applicant should ensure that the attenuation tank(s) are designed to the Ciria/Susdrain Method 2 tank design.

Transport

46 A key principle of the revised Charlton Riverside masterplan SPD is improving connectivity through the area and a key east-west route is proposed to help achieve this. It is understood that this new route is likely to follow the route of the development access road and will be the focus of any future public transport route through the Opportunity Area. This has taken on further importance in relation to the proposed Transit Study being undertaken by Transport for London (TfL) and the applicant is required set out how the proposed development will fit into, and facilitate, the future proposals for the site, without precluding any potential future transit route. Further work and engagement is also required between the applicant, TfL and the Council on the proposed access from Hope and Anchor Lane into the site as there is likely to be a significant increase in vehicular movements using this and will take on greater importance as the masterplan area is built out. The form and design of this junction will be crucial to provision of any transit routes through Charlton Riverside and sufficient area should be secured to enable junction improvements in future.

47 The development will generate a significant additional number of bus passenger trips during peak periods. In addition to the expected level of future development in the Charlton Riverside area, and the already congested nature of bus services, especially those accessing Greenwich Peninsula during the peak periods, further crowding is likely to be experienced. TfL therefore expects the development to contribute towards improvements to the bus network to mitigate the expected increase in demand. It has been calculated that a contribution of £1.1 million would be required to enhance bus services or facilitate infrastructure improvements as appropriate. This is based upon the introduction of four new bus journeys across an initial period of three years, which should be sufficient to enable the introduction of services at the outset of the opening of the development whilst demand builds up.

48 The applicant has identified potential opportunities to contribute positively to the local pedestrian/cycle network and TfL welcome further discussions with both the applicant and the Council regarding the mechanism for delivering these improvements and how they fit in with the overall movement strategy for the masterplan area.
Due to the low car parking provision on site, the use of car clubs should be encouraged and the applicant should approach operators to provide space for Car Club vehicles within the scheme. The provision electric vehicle charging points in accordance with the London Plan standards is welcomed and should be secured by condition.

The travel plan should be secured, enforced, monitored and reviewed as part of the section 106 agreement and the delivery and servicing plan should be secured by a condition. There is a lack of any detail regarding construction arrangements for the site and in accordance with London Plan policies, a draft construction logistics plan should be produced prior to determination and secured by condition.

Community Infrastructure Levy

The Mayoral CIL applies for any new application and is a charge of £35 per sq.m. (based on the gross internal floor area) in the Royal Borough of Greenwich. The CIL would be payable on commencement and the collection of the CIL would be administered by the Council who would transfer the payment to the Mayor / TfL.

Local planning authority’s position

The local planning authority’s position is unknown at the time of writing.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on Opportunity Areas; mixed-use development; housing; affordable housing; urban design; inclusive access; sustainable development; and, transport are relevant to this application. Whilst the principle of development is supported in strategic planning terms, the application does not yet fully comply with the London Plan, as summarised below. The resolution of these issues could, nevertheless, lead to the application becoming compliant with the London Plan and should therefore be addressed prior to the Mayor’s decision making stage:
- **Principle of development**: the principle of the residential-led, mixed-use development of this site that will deliver a significant quantum of new homes within the Charlton Riverside Opportunity Area is supported in principle. Further clarification on the existing and proposed employment density is required.

- **Housing & affordable housing**: 143 units, or 16% on a habitable room basis. The current offer is unacceptable and GLA officers will robustly interrogate the viability with the Council and the applicant to ensure that the maximum reasonable amount of affordable housing is delivered that appropriately responds to the requirements of the draft SPG, London Plan Policy 3.11 and local policy.

- **Density**: the principle of a high density development in this location is supported in principle, however, the design issues must be addressed before the proposed density can be considered acceptable.

- **Urban design**: the general layout is supported and aligns with principles to improve wider connectivity and permeability across the masterplan area. The applicant should revise the proposed scale and massing of the taller elements in response to concerns over impacts on overall design quality and proposed amenity spaces, in addition to those comments raised above with regards to ensuring the proposed buildings positively address the Yarn Lane and Mirfield Street and the delivery of public realm proposals outside of the red line boundary.

- **Inclusive design**: further information on the proposed landscape treatments are required in addition to an increase in disabled parking provision.

- **Sustainable development**: the strategy is generally supported; however further information to verify the savings claimed including construction details, cooling demand and overheating, the site heat network and CHP analysis is required.

- **Transport**: further information demonstrating how the proposals will fit into the emerging masterplan is required, in addition to financial contributions towards improvement of the local bus network to mitigate increased demand. Car parking, electric vehicle charging points, travel, delivery and servicing, and construction logistics plans should be secured by planning condition or obligation.

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