Strategic planning application stage 1 referral


The proposal

2245r (LPA ref: 17/1240/F): Erection of building up to 15 storeys providing 252 residential units and 323sq.m. commercial floorspace.

2245s (LPA ref: 17/1239/MA): Variation of planning permission ref 14/2607/F to allow changes to the layout, elevation and height of Blocks C and D, reconfiguration of the combined Phase 3 basement level, highway alterations, and revisions to play strategy.

The applicant

The applicant is Berkeley Homes (East Thames) Ltd and the architect is Reddy Architecture. The agent is Barton Willmore.

Strategic issues summary:

- **Social infrastructure:** The loss of social infrastructure should be further justified to include an updated community strategy. (para.19)

- **Housing:** The proposals involve an uplift in residential provision of 106 units. The affordable housing provision remains at the consented levels (35.6%) and complies with SPG threshold approach. Further information on the affordability of the Discount Market Sale units should be submitted. Further justification should be provided on the delivery of affordable family dwellings within the wider masterplan area. (paras. 20-26)

- **Climate change:** The potential for further carbon savings should be further investigated. Any shortfall in savings identified after this further review should be off-set. (para.34)

- **Transport:** Parking provision for the non-residential uses should be reduced in proportion to the proposed reduction in floorspace. Further information on visitor parking, Blue Badge parking and cycle design is required. Updated parking, travel, construction and servicing plans should be submitted. (paras. 35-39)

Recommendation

That Greenwich Council be advised that whilst the applications are broadly supported in strategic planning terms they do not yet comply with the London Plan for the reasons set out in paragraph 43 of this report. Possible remedies are set out in that paragraph to ensure full compliance with the London Plan.
Context

1 On 10 May 2017 the Mayor of London received documents from Greenwich Council notifying him of two planning applications 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 is required to provide the Council with a statement setting out whether he considers that the applications comply with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The applications are referable under Categories 1A, 1B and 1C of the Schedule to the Order 2008:

Category 1A:
“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.

Category 1B:
“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings—
(c) outside Central London and with a total floorspace of more than 15,000 square metres.”

Category 1C:
“Development which comprises or includes the erection of a building more than 30 metres high and outside the City of London.”

3 Once Greenwich Council has resolved to determine the applications, it is required to refer them back to the Mayor for his decision as to whether to direct refusal; take them over for his own determination; or allow the Council to determine them itself. The Mayor of London’s statement on these cases will be made available on the GLA website www.london.gov.uk.

Site description

4 The application sites fall within the outline Kidbrooke masterplan approved in June 2009 for the estate renewal of up to 4,000 units and a range of other non-residential uses (GLA reference PDU/2245). The masterplan area as defined by the Kidbrooke SPD (adopted 2008), covers an area of approximately 109 hectares and includes, for the majority part, the existing Ferrier housing estate. It is located between Kidbrooke to the north, Eltham to the east and Blackheath and Lee Green to the west. The World Heritage Site of Maritime Greenwich is located beyond Blackheath Park to the northwest. The area is also identified as an Area for Intensification in the London Plan.

Relevant history

5 Outline planning permission was granted in 2009 (GLA ref: PDU/2245, LPA ref: 08/2782/O) for the redevelopment of approximately 109 hectares of land in Kidbrooke including the Ferrier housing estate, to provide up to 4,000 residential units (including 1,525 (38%) affordable units), mixed commercial and community uses and a railway station across six phases. Various applications have been approved for modifications to the approved masterplan and individual phases since 2009.
In March 2015, planning permission was granted (GLA ref: 2245f, 2245h & 2245i; LPA ref: 14/2607/F, 14/2611/F & 14/2554/O) for amendments to Phases 3, 5 and 6 of the masterplan in standalone applications for each phase.

In relation to Phase 3, planning permission ref: 14/2607/F was granted for the:

“Demolition of existing buildings and erection of 1,238 residential units (Use Class C3) together with 1,957sqm retail / commercial (Use Class A1), 1,305sqm of retail/ commercial (Use Class A2-A5), 345sqm restaurant (Use Class A3), 5,713sqm of community (Use Class D1), a 2,696sqm supermarket (Use Class A1), a public square, publicly accessible open space and associated access, servicing, car parking, cycle parking and landscaping.”

The revised planning permissions resulted in an overall uplift in housing within the masterplan area from 4,000 units to 4,782 units, with 1,238 units delivered in Phase 3. The overall affordable provision was revised to 1,700 units (35.6%).

Additionally, separate applications for non-material and minor material amendments for Phase 3 have subsequently been submitted:

- 17/0536/MA: Amendments to Block A including addition of two units (resulting in 225 units in this block), insertion of residents’ gym and reconfiguration of commercial space;
- 17/0094/MA: Amendments to Block B to provide 8 additional residential units (resulting in 90 units within this block) and reconfiguration of commercial floorspace.

These amendments to Blocks A and B would result in an overall baseline housing provision in Phase 3 of 1,248 units.

Details of the proposal

The current proposals relate to Phase 3 of the masterplan. This phase comprises seven blocks (A-G) and a new public square. Blocks A and B are currently under construction. The current applications propose amendments to Blocks C, D and E, as follows:

Block E (LPA ref: 17/1240/F):

A full planning application has been submitted proposing amendments to this block. Changes to the massing are proposed involving the addition of 4 storeys to one of the tower elements. An uplift of 45 residential units is proposed within this block, resulting in a total of 252 units. Block E will continue to be in 100% affordable tenure.

Blocks C & D (LPA ref: 17/1239/MA):

A Section 73 application has been submitted, proposing the following amendments to planning permission ref: 14/2607/F, in respect of Blocks C and D:

Block C:
- Changes to the layout, including the relocation of the proposed creche to Block D, increased commercial provision and associated reconfiguration of playspace.
- Residential mix altered to convert 21 of the consented 2-bedroom units into 1-bedroom “Manhattan” units, resulting in an addition of 21 units within this block.

Block D:
- Removal of mezzanine level with associated reduction of consented commercial and community floorspace.
• Insertion of additional residential floor levels, resulting in the provision of 40 additional residential units (an additional 17 x 1-bed units, 16 x 2-bed, and 7 x 3-bed). This block would now provide 334 residential units.

14 Elevational changes are proposed to both blocks, along with alterations to the layout of the basement shared by all the blocks in Phase 3. This results in an increase in residential parking spaces, whilst the commercial parking provision would remain the same. Realignment of the road network in Phase 3 is also proposed.

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

15 The relevant issues and corresponding policies are as follows:

- **Social Infrastructure**
  - London Plan; Social Infrastructure SPG;
- **Housing**
  - London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;
- **Affordable housing**
  - London Plan; Housing SPG; draft Affordable Housing and Viability SPG; Housing Strategy;
- **Urban design**
  - London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- **Access**
  - London Plan; 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; Mayor’s Transport Strategy.

16 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 Greenwich Core Strategy and Development Management Policies Development Plan Documents 2014, the saved policies of the Unitary Development Plan 2006 and the 2016 London Plan (Consolidated with Alterations since 2011).

17 The National Planning Policy Framework (NPPF), the Technical Guide to the NPPF, and the Kidbrooke SPD (2008) are also material considerations.

**Principle of development**

18 The principle of the site being developed for a large scale, mixed-use residential-led development is established as part of the June 2009 outline planning permission, which includes a mix of residential use and open space and is in accordance with the aspirations of the London Plan which identifies Kidbrooke as an intensification area. The current proposals involve an uplift in residential unit numbers which is consistent with the aims of original masterplan, London Plan housing policy objectives and the intensification area.

19 Whilst the land use principles overall remain acceptable, concerns are raised regarding the loss of community floorspace proposed as part of the Section 73 application for Blocks C and D. London Plan Policy 3.16 (protection and enhancement of social infrastructure) states that “proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for reprovision should be resisted.” The reconfiguration of the layout and removal of the podium level within Block D would result in the loss of 3,084 sq.m. of floorspace previously consented for community use, without its replacement.
elsewhere. Whilst there is an aspiration for community uses to be included within future Henley Cross proposals within the Kidbrooke Masterplan Area, there are currently no proposals for the replacement of this floorspace. The loss of community space will need to be fully justified by the applicant having regard to an assessment of the demand arising from the redeveloped masterplan area, and an updated community strategy should be prepared to demonstrate how the needs of the Kidbrooke community will be met.

**Housing**

20 As set out above, the changes to Blocks C, D and E proposed in the two applications will result in an uplift of 106 residential units within the Village Centre (Phase 3) scheme. The tables below set out the proposed uplift compared to the 1,248 baseline provision in this Phase:

**Phase 3 baseline residential provision:**

<table>
<thead>
<tr>
<th>Block</th>
<th>1 bed</th>
<th>2 bed</th>
<th>3 bed</th>
<th>4 bed</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>99</td>
<td>113</td>
<td>13</td>
<td>0</td>
<td>225</td>
</tr>
<tr>
<td>B</td>
<td>7</td>
<td>68</td>
<td>15</td>
<td>0</td>
<td>90</td>
</tr>
<tr>
<td>C</td>
<td>25</td>
<td>53</td>
<td>5</td>
<td>0</td>
<td>83</td>
</tr>
<tr>
<td>D</td>
<td>96</td>
<td>159</td>
<td>39</td>
<td>0</td>
<td>294</td>
</tr>
<tr>
<td>E</td>
<td>66</td>
<td>87</td>
<td>52</td>
<td>2</td>
<td>207</td>
</tr>
<tr>
<td>F</td>
<td>41</td>
<td>57</td>
<td>33</td>
<td>2</td>
<td>133</td>
</tr>
<tr>
<td>G</td>
<td>69</td>
<td>90</td>
<td>57</td>
<td>0</td>
<td>216</td>
</tr>
<tr>
<td>Total</td>
<td>403</td>
<td>627</td>
<td>214</td>
<td>4</td>
<td>1,248</td>
</tr>
</tbody>
</table>

**Phase 3 proposed residential provision:**

<table>
<thead>
<tr>
<th>Block</th>
<th>1 bed</th>
<th>2 bed</th>
<th>3 bed</th>
<th>4 bed</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>99</td>
<td>113</td>
<td>13</td>
<td>0</td>
<td>225</td>
</tr>
<tr>
<td>B</td>
<td>7</td>
<td>68</td>
<td>15</td>
<td>0</td>
<td>90</td>
</tr>
<tr>
<td>C</td>
<td>67 (+42)</td>
<td>32 (-21)</td>
<td>5 (0)</td>
<td>0 (0)</td>
<td>104 (+21)</td>
</tr>
<tr>
<td>D</td>
<td>113 (+17)</td>
<td>175 (+16)</td>
<td>46 (+7)</td>
<td>0 (0)</td>
<td>334 (+40)</td>
</tr>
<tr>
<td>E</td>
<td>93 (+27)</td>
<td>101 (+14)</td>
<td>52 (0)</td>
<td>6 (+4)</td>
<td>252 (+45)</td>
</tr>
<tr>
<td>F</td>
<td>41</td>
<td>57</td>
<td>33</td>
<td>2</td>
<td>133</td>
</tr>
<tr>
<td>G</td>
<td>69</td>
<td>90</td>
<td>57</td>
<td>0</td>
<td>216</td>
</tr>
<tr>
<td>Total</td>
<td>489 (+78)</td>
<td>636 (+9)</td>
<td>221 (+7)</td>
<td>8 (+4)</td>
<td>1,354 (+106)</td>
</tr>
</tbody>
</table>
Affordable housing

The outline permission for the Kidbrooke Masterplan required the delivery of 1,525 of the 4,000 residential units as affordable dwellings. This equated to 38% of the overall provision by unit. The full applications for Phases 3, 5 and 6 approved in 2015 revised the residential mix and affordable housing delivery within the Kidbrooke Masterplan area. The revised affordable housing provision amounted to 1,700 units including an off-site contribution for 150 social rented units, equating to 35.6% of the scheme. The comparison between the affordable provision in the outline consent, the revised full consents and the changes proposed in the current applications is shown in the tables below:

Affordable housing provision within the Kidbrooke Masterplan:

<table>
<thead>
<tr>
<th></th>
<th>2009 outline consent</th>
<th>2015 revisions + MMAs</th>
<th>Current proposals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intermediate</td>
<td>687</td>
<td>712</td>
<td>716</td>
</tr>
<tr>
<td>Social rent &amp; extra care</td>
<td>738</td>
<td>738</td>
<td>748</td>
</tr>
<tr>
<td>Discount market sale</td>
<td>100</td>
<td>100</td>
<td>122</td>
</tr>
<tr>
<td>Off-site</td>
<td></td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Total affordable</td>
<td>1,525</td>
<td>1,700</td>
<td>1,736</td>
</tr>
<tr>
<td>Total units</td>
<td>4,000</td>
<td>4,763</td>
<td>4,869</td>
</tr>
<tr>
<td>% Affordable</td>
<td>38</td>
<td>35.6</td>
<td>35.6</td>
</tr>
</tbody>
</table>

Affordable housing provision within Phase 3 (2015 consents):

<table>
<thead>
<tr>
<th>Block</th>
<th>Private</th>
<th>Intermediate</th>
<th>Social Rent</th>
<th>DMS</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>211</td>
<td>0</td>
<td>0</td>
<td>14</td>
<td>225</td>
</tr>
<tr>
<td>B</td>
<td>90</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>90</td>
</tr>
<tr>
<td>C</td>
<td>83</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>83</td>
</tr>
<tr>
<td>D</td>
<td>260</td>
<td>23</td>
<td>0</td>
<td>11</td>
<td>294</td>
</tr>
<tr>
<td>E</td>
<td>0</td>
<td>79</td>
<td>105</td>
<td>23</td>
<td>207</td>
</tr>
<tr>
<td>F</td>
<td>116</td>
<td>0</td>
<td>0</td>
<td>17</td>
<td>133</td>
</tr>
<tr>
<td>G</td>
<td>0</td>
<td>160</td>
<td>53</td>
<td>3</td>
<td>216</td>
</tr>
<tr>
<td>Total</td>
<td>760</td>
<td>262</td>
<td>158</td>
<td>68</td>
<td>1248</td>
</tr>
<tr>
<td>Total Affordable</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>488 (35.6%)</td>
</tr>
</tbody>
</table>

page 6
Affordable housing provision within Phase 3 (current proposals):

<table>
<thead>
<tr>
<th>Block</th>
<th>Private</th>
<th>Intermediate</th>
<th>Social Rent</th>
<th>DMS</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>211</td>
<td>0</td>
<td>0</td>
<td>14</td>
<td>225</td>
</tr>
<tr>
<td>B</td>
<td>90</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>90</td>
</tr>
<tr>
<td>C</td>
<td>104</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>104</td>
</tr>
<tr>
<td>D</td>
<td>314</td>
<td>11</td>
<td>0</td>
<td>14</td>
<td>334</td>
</tr>
<tr>
<td>E</td>
<td>0</td>
<td>95</td>
<td>115</td>
<td>42</td>
<td>252</td>
</tr>
<tr>
<td>F</td>
<td>116</td>
<td>0</td>
<td>0</td>
<td>17</td>
<td>133</td>
</tr>
<tr>
<td>G</td>
<td>0</td>
<td>160</td>
<td>53</td>
<td>3</td>
<td>216</td>
</tr>
<tr>
<td>Total</td>
<td>835</td>
<td>266</td>
<td>168</td>
<td>90</td>
<td>1354</td>
</tr>
<tr>
<td>Total affordable</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>524 (35.6%)</td>
</tr>
</tbody>
</table>

22 GLA officers welcome the maintained affordable housing percentage, as well as the overall uplift in affordable housing numbers in the Phase 3 proposals. It is notable that the affordable housing uplift is being achieved substantially via the increase of discount market sale (DMS) units as opposed to shared ownership or social rented units. This represents a minor increase in the percentage of DMS compared to the 2015 consented proposals, although it would be lower than that proposed in the outline scheme:

Phase 3 affordable tenure split:

<table>
<thead>
<tr>
<th>Phase 3</th>
<th>2009 outline consent</th>
<th>2015 revisions</th>
<th>Current proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intermediate</td>
<td>45%</td>
<td>54%</td>
<td>50%</td>
</tr>
<tr>
<td>Social rent &amp; extra care</td>
<td>36%</td>
<td>32%</td>
<td>32%</td>
</tr>
<tr>
<td>Discount market sale</td>
<td>19%</td>
<td>14%</td>
<td>17%</td>
</tr>
</tbody>
</table>

23 The Mayor’s draft Affordable Housing and Viability SPG sets out the preferred affordable housing products and tenure split as follows:

- At least 30% low cost rent (social or affordable rent)
- At least 30% intermediate products (London Living Rent or shared ownership)
The remaining 40% to be determined by the LPA, which is encouraged to be drawn from the above products but can include other products that are evidenced as genuinely affordable and are consistent with the London Plan’s definition of affordable housing. (London Plan Policy 3.10 (definition of affordable housing) states that as well as shared ownership, intermediate housing can include other low cost homes for sale. However, affordability criteria must be met to ensure these homes are genuinely affordable.)

24 The proposed tenure split would continue to meet the approach set out in the draft Affordable Housing and Viability SPG, so long as the DMS units are evidenced as being a genuinely affordable product. Further information should therefore be submitted before the application is referred back to the Mayor at Stage 2, explaining the discount to market values proposed by these units, and the eligibility criteria including income thresholds. Information on the affordability criteria for the intermediate units, and the rent levels for the socially rented units should also be provided.

25 If this information confirms the affordability of the units, the delivery of over 35% affordable housing with the proposed tenure split meets the threshold approach within the Mayor’s draft Affordable Housing and Viability SPG, and the proposals are therefore welcomed. An early stage review mechanism, which would be triggered if the scheme is not implemented within two years, must be secured in compliance with the Mayor’s draft SPG.

Housing choice

26 The consented dwelling mix for Phase 3 included 218 family-sized dwellings, equating to 17.5%. The current proposals would marginally reduce the percentage of family dwellings in this phase to 16.9%, however the actual number of family dwellings would increase to 229. The number of affordable family housing units would reduce by 16. This reduction is confined to the intermediate units only, whereas the number of socially rented family units would increase by 5 units compared to the consented scheme. The total number of affordable family units in this phase would equate to 23.2%. Across the wider Kidbrooke Masterplan Area, the requirement is to provide 28.3% of the affordable housing units, and in order to confirm the acceptability of the loss of affordable family dwellings in Phase 3, it should be set out how this requirement on the wider site will continue be met through the delivery of future phases.

Density

27 The residential density of the proposals, taking account of the uplift in housing proposed in the two current applications, would be 358 dwellings per hectare. The consented density was 332 dwellings per hectare. It has previously been accepted that Phase 3 can support higher densities given its position as the village centre hub, close to public transport, and that this phase is most suitable for smaller dwellings. The residential units provided will meet relevant standards and are high quality. Having regard to the local context of the land within Phase 3, the proposed density is acceptable in principle.

Residential quality

28 All units have been designed to meet the space standards for internal and external space as set out in the Mayor’s Housing SPG and the Nationally Prescribed Space standards. The applicant has provided a statement of compliance with the Mayor’s housing standards and the units provided would provide a good standard of accommodation.
Children’s play space

29 The uplift in unit numbers proposed under the current applications has necessitated a review of the consented child playspace strategy in Phase 3. Using the methodology within the Mayor’s Play and Informal Recreation SPG, a minimum of 3,040 sq.m. of child’s playspace is now required in this phase (compared to 2,710 sq.m. in the consented proposals). An updated playspace strategy has been submitted, showing how the required space would be distributed throughout the phase, in a mixture of formal doorstep play for under-fives (at ground and podium levels), and playing areas for older children within the park space. The proposed playspace strategy is acceptable.

Urban design

30 The principles of the plot layout, the nature of the connecting spaces and the architectural design and massing of each building within Phase 3 have been previously agreed under the previous consents. The current proposals include minor changes to the external appearance of Blocks C and D, and more substantial massing alterations to Block E.

31 The massing elements of Block E would be reconfigured to reposition the 8-10 storey linear block on north eastern side to the western side, and the repositioning of the 2-3 storey townhouses from the western side to the north eastern side. The northern corner element (Block E1) would be raised to 15 storeys and would be the tallest element of the building, which would now have three “pocket towers” in each corner. The changes to the massing of this block are acceptable and consistent with the aims and design intention of the consented masterplan. The redistribution of the massing will present a more open aspect to the southern side, allowing more sunlight penetration into the interior of the development.

32 The changes proposed to Blocks C and D have a minor impact on the appearance of these blocks, which continue to be acceptable in design.

Inclusive access

33 As a result of the uplift of 106 residential units in Phase 3, additional M4(3) compliant (wheelchair accessible or adaptable) would be provided. Ten units in Block C, 42 units in Block D and 28 units in Block E would be wheelchair accessible/adaptable, maintaining the 10% provision. Full compliance with M4(3) and M4(2) should be secured by condition.

Climate change

34 The applicant has submitted updated energy strategy notes in support of the applications. For the Section 73 application (affected Blocks C and D), it has been confirmed that these buildings will continue to achieve a 35% reduction in carbon emissions compared to a 2013 Building Regulations compliant development, in line with the consented proposals. For Block E, the latest London Plan zero carbon target is noted, and it is proposed that the additional 45 flats proposed as part of this application are subject to the zero carbon target. A payment in lieu to offset the additional regulated emissions from these 45 units is proposed. Although an off-set payment is acceptable where it can be demonstrated that it is unfeasible to make additional carbon savings in the building, the applicant should first further investigate how additional savings can be made in Block E. For instance, no renewable technology is currently proposed and the applicant should further consider the inclusion of such technology. Information on the overall carbon savings of the building with the inclusion of these measures should be presented, before a calculation of any appropriate off-set payment.
Transport

35 The uplift of 106 residential units proposed under the combined current applications would not have significant further impact on the local highway and public transport network. Whilst some realignment of the street pattern within Phase 3 is proposed, this does not alter the agreed access principles. The enhancement to the access and streetscape proposed under these applications is supported.

36 As per the baseline scheme, the majority of residential and commercial car parking for the Village Centre (including Blocks C, D and E) will be located within an extensive shared basement area. The application seeks to provide car parking in line with the baseline scheme, with a residential parking ratio of 0.4 spaces per dwelling which is acceptable. An appropriate uplift in Blue Badge parking, accounting for the additional wheelchair accessible units, should be provided and secured by condition. Electric vehicle charging points should be provided in accordance with London Plan, and a car parking management plan (CPMP) should also be submitted. These items, as well as a continued residents’ exemption from obtaining CPZ parking permits, should be secured by condition or S106 agreement.

37 The parking allocation for the non-residential uses in Phase 3 should be reduced proportionately to reflect the reduction in non-residential floorspace. Further explanation of the visitor parking levels, including who these spaces would be used by, should also be submitted.

38 London Plan policy compliant levels of cycle parking are proposed in the amended blocks and in Phase 3 as a whole which is welcomed. However, further detail is required to demonstrate compliance with the London Cycle Design Standards.

39 A fully updated travel plan, construction & logistics plan and delivery and servicing plan should be submitted in order to fully assess the proposals. Final plans should be secured via condition.

Local planning authority’s position

40 Greenwich Council planning officers are still assessing the application, and aim to report the case to the Council’s planning committee in July.

Legal considerations

41 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

42 There are no financial considerations at this stage.
Conclusion

London Plan policies on social infrastructure, housing, affordable housing, urban design, inclusive access, sustainable development and transport are relevant to this application. The proposals are broadly supported in strategic planning terms; however the application does not fully comply with the London Plan and the following matters should be addressed:

- **Social infrastructure**: The loss of social infrastructure should be further justified to include an updated community strategy.

- **Housing**: The proposals involve an uplift in residential provision of 106 units. The affordable housing provision would be proportionately increased to remain at consented levels. The 35.6% affordable housing complies with the threshold approach in the Mayor’s draft Affordable Housing and Viability SPG and is supported. However, further information on the affordability of the DMS units should be submitted, as well as the affordability criteria of the shared ownership and rented units, to ensure that the proposed housing is genuinely affordable. Further justification should be provided on the delivery of affordable family dwellings within the wider masterplan area. An early stage review mechanism must be secured.

- **Climate change**: The potential for further carbon savings should be further investigated. Any shortfall in savings identified after this further review should be off-set.

- **Transport**: Parking provision for the non-residential uses should be reduced in proportion to the proposed reduction in floorspace. Further information on visitor parking, Blue Badge parking and cycle design is required. Updated parking, travel, construction and servicing plans should be submitted.

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