## Strategic planning application stage 1 referral (new powers)


## The proposal

Full planning permission for a new academic building to accommodate University of Greenwich’s School of Architecture & Construction, a library and flexible retail/gallery space.

## The applicant

The applicant is University of Greenwich and the architect is Heneghan Peng Architects.

## Strategic issues

The application raises strategic matters regarding the principle of development (potential delivery of housing), heritage, urban design, access, climate change and transport.

## Recommendation

That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 69 of this report; but that the possible remedies set out in paragraph 71 of this report could address these deficiencies.

## Context

1. On 10 February 2011, 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 23 March 2011, to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2. The application is referable under Category 1B1.b of the Schedule to the Order 2008:

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

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

Site description

6 The site is within Greenwich town centre located on the junction of Greenwich High Road, Church Street and Stockwell Street and is approximately 0.65 hectares. The site is within the West Greenwich Conservation Area and is within the Maritime Greenwich World Heritage Site. The immediate boundaries to the site comprise the railway cutting to the north, residential uses to the east (King William Walk), retail uses to the south on Nevada Street and Stockwell Street to the west. A range of uses has previously occupied the site, including a former petrol station, office building, industrial and retail uses. A temporary market has also operated from the site in the past on weekends. The site forms a fairly significant but unusual break in the townscape of the town centre due to World War II bomb damage, which was later partly filled in the late 1960’s with an office building.

7 The A200 Greenwich Church Street and A206 Nelson Road, located approximately 100 metres north from the site, both form part of the Strategic Road Network (SRN). The A2 Blackheath Hill, approximately 750 metres to the south of the site, is the nearest section of the Transport for London Road Network (TLRN). The site is also located within an acceptable walking distance of both the Cutty Sark Docklands Light Railway (DLR) station and Greenwich DLR/ National Rail station, both of which offer frequent services into central London. Numerous bus routes also serve the site with bus stops located on both the A206 and Greenwich Church Street. The site also benefits from access to the Greenwich Pier, which also offers river services to central London and Woolwich. As a result, the site records a very good public transport accessibility level (PTAL) of 5, out of a range of 1 to 6 where 6 is considered as excellent.

Details of the proposal

8 Full planning permission is sought for the redevelopment of the site to accommodate a new School of Architecture & Construction, a new University Library and ancillary retail and gallery space for the University of Greenwich. The floor space is shown in table 1 below.

<table>
<thead>
<tr>
<th>Use</th>
<th>Floorspace</th>
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<tbody>
<tr>
<td>New academic building (D1 Use)</td>
<td>8,923 sq.m. GEA</td>
</tr>
<tr>
<td>University library (D1 Use)</td>
<td>6,828 sq.m. GEA</td>
</tr>
<tr>
<td>Flexible retail/ gallery (A1/ A2/ A3/ D1)</td>
<td>486 sq.m. GEA</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>16,237 sq.m. GEA</strong></td>
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In terms of built form the majority of the building will be 4-storeys reducing to 3-storey along Stockwell Street and to the rear of the site where it abuts the rear gardens of residential properties on King William Walk.

Case history

On 23 September 2008, the Mayor considered a scheme for mixed use development comprising 129 flats, retail and restaurant uses, office accommodation and market stalls (PDU/0346a/01). The Mayor was broadly content with the application, allowing Greenwich Council to determine the case subject to any action from the Secretary of State. The planning permission was, however, never issued due to the section 106 not being signed.

The applicant met with the GLA for pre-application discussions in August 2010. The GLA provided written advice, which was issued on 29 September 2010. The key issues raised at that time related to the principle of development and specifically the potential land use conflicts as described by the planning brief for the site, and the subsequent strategic implications arising regarding housing delivery; heritage, design, in particular regarding the appearance of the northern elevation. Matters regarding accessibility, transport and climate change were also raised.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Economic development: London Plan; the Mayor’s Economic Development Strategy
- World city role: London Plan
- Housing: London Plan, PPS3
- Urban design: London Plan; PPS1
- Mix of uses: London Plan
- Regeneration: London Plan; the Mayor’s Economic Development Strategy
- Transport: London Plan; the Mayor’s Transport Strategy; PPG13
- Parking: London Plan; the Mayor’s Transport Strategy; PPG13
- Retail/town centre uses: London Plan; PPG13, PPS4
- Access: London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; 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)
- Tall buildings/views: London Plan; RPG3A, Revised View Management Framework SPG
- Education: London Plan; Ministerial statement July 2010
- Sustainable development: London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor’s Energy Strategy; Mayor’s draft Climate Change Mitigation and Adaptation Strategies; Mayor’s draft Water Strategy; Sustainable Design and Construction SPG
- Historic Environment: London Plan; PPS5

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 (as saved 15 July 2009) and the London Plan (Consolidated with Alterations since 2004).

The following are also relevant material considerations:
• The draft replacement London Plan, published in October 2009 for consultation.

Principle of development

15 London Plan policy 3A.25, emerging policy 3.19 and supporting text in paragraph 3.100 promote the development of higher and further education institutions, in particular these should be located in areas where there is good public transport. London Plan policy 3D.1 supports such an approach within town centres, which can further strengthen the overall town centre offer.

16 Greenwich West is identified as a District Centre in the London Plan. The Greenwich UDP (2006) identifies the site as MU3, allocated for a mix of town centre uses. Specific uses are fleshed out in the Stockwell Street Design Brief (November 2000), which is referenced in the current UDP in the Site Proposals Schedule under ‘mixed uses’. The brief indicates a mix of office, hotel, residential (including where appropriate affordable housing), tourist related activities and small-scale retail.

17 Whilst in strategic terms the principle of a higher educational institution is supported and is of a scale appropriate to a district centre (i.e. a centre of more than local importance), the local land use policy position suggests other uses are also prioritised as set out in the design brief. The planning statement suggests the Council is content with the land use approach (paragraph 4.11), however, it is not clear whether sufficient consideration has been given to the other uses identified in the design brief and how these have informed other policy matters in the UDP and emerging Core Strategy. For example at the time of drafting the brief suggests that housing delivery is considered an appropriate use for the site and the current approach may therefore have informed wider strategic housing targets in the core strategy which may have implications regarding housing and affordable housing delivery.

18 Further clarity regarding the status of the land use and priorities in terms of consistency with the plan led approach and the implications to other policies in the UDP and the London Plan, in particular housing delivery, need to be addressed. Housing polices set out in the London Plan may therefore be relevant to the consideration of the case and the approach should be clearly established before the matter is considered again at the final determination stage.

Market provision

19 Policy 3D.3 of the London Plan, Maintaining and improving retail facilities, sets out that boroughs should work with retailers and others to prevent the loss of retail facilities, including street and farmers’ markets, that provide essential convenience and specialist shopping and to encourage mixed use development. This aspiration is carried forward in draft replacement London Plan policy 4.8 Supporting a successful and diverse retail sector. The issue of the site being used for Greenwich Village Market was not clearly articulated during pre-application discussions; however, having considered the planning history of the site, the loss of the market remains a material consideration. Further information is therefore required regarding the status of the market since the previous application and how the proposals fit within the strategic objectives described above and whether there is opportunity to provide market stall provision as part of the new proposals. This will require discussion with Greenwich Council, GLA and TfL and other relevant stakeholders.
Design

20 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. London Plan policy 4B.1 sets out a series of overarching design principles for development in London. Other design polices in this chapter and elsewhere in the London Plan include specific design requirements relating to specific issues. London Plan policies 4B.12 and 4B.14, set out specific design requirements relating to heritage conservation and World Heritage Sites. Other policies in chapter 4B consider the potential of sites, tall and large-scale buildings, views, and the Blue Ribbon network.

21 The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (Policy 7.1).

Heritage

22 In this particular case, the principal consideration in determining the acceptability of the proposal in design terms is its bearing on the historic assets in the vicinity and specifically whether or not it would preserve or enhance the character or appearance of the conservation area, the setting of listed buildings and protect the ability to appreciate the outstanding universal values of the World Heritage Site.

This site is part of the wider designation of Maritime Greenwich by the United Nations Education, Scientific, Cultural Organisation (UNESCO) as a World Heritage Site (WHS) designated in October 1997. World Heritage Site designations are based on a number of criteria (amended in 2006) that are deemed to represent the outstanding universal value of a site. In the case of Maritime Greenwich, the designation reflects the criteria as follows:

Criterion 1: The public and private buildings and the Royal Park at Greenwich form an exceptional ensemble that bears witness to human artistic and creative endeavour of the highest quality.

Criterion 2: Maritime Greenwich bears witness to European architecture at an important stage of its evolution, exemplified by the work of great architects such as Inigo Jones and Christopher Wren who, inspired by developments on the continent of Europe, each shaped the architectural development of subsequent generations, while the Park exemplifies the interaction of man and nature over two centuries.

Criterion 4: The Palace, Royal Naval College, and Royal Park demonstrate the power, patronage, and influence of the Crown in the 17th and 18th centuries and its illustration through the ability to plan and integrate culture and nature into a harmonious whole.

Criterion 6: Greenwich is associated with outstanding architectural and artistic achievements as well as with scientific endeavour of the highest quality through the development of navigation and astronomy at the Royal Observatory, leading to the establishment of the Greenwich Meridian and Greenwich Mean Time as world standards.

23 Development within the WHS is managed in the same way as all other development, through development plan policy. It is however, also informed by any relevant World Heritage Site Management Plan. In this case the Maritime Greenwich World Heritage Site Management Plan (1998) provides some, but limited, guidance: “New development should complement the prevailing character of the area. In particular, new buildings should reflect the scale, form,
massing, and proportions of the existing development, and should be integrated with the street pattern and grain of the area... redevelopment and gap sites - e.g. Stockwell Street and Durnford Street - must be handled with sensitivity and care. Undeveloped sites should be subject of design briefs and possibly competitions, to encourage the best development solutions appropriate to their context. Uses should be appropriate to the function and character, and should assist in creating lively streets and interesting street frontages”.

24 PPS 5 sets out the Government’s policy in relation to the historic environment and contains a presumption in favour of the conservation of designated heritage assets (Policy HE9), which also includes treating favourably applications that preserve those elements of the setting of a heritage asset that make a positive contribution to or better reveal its significance (HE10.1).

25 Consideration should be given to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal (Policy HE7) and the desirability of sustaining and enhancing the significance of heritage assets and of utilising their positive role in place shaping (HE 7.4).

26 In this particular case, HE9.5 of PPS 5 is also particularly relevant to the consideration of the case. Here it is noted that “Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. When considering proposals, local planning authorities should take into account the relative significance of the element affected and its contribution to the significance of the World Heritage Site or Conservation Area as a whole. Where an element does not positively contribute to its significance, local planning authorities should take into account the desirability of enhancing or better revealing the significance of the World Heritage Site or Conservation Area, including, where appropriate, through development of that element. This should be seen as part of the process of place-shaping.”

27 The site was subject to significant bomb damage during World War II, and at present there is a noticeable and unfortunate gap in the townscape, which would have previously formed a perimeter block with Nevada Street and King William Walk. Some infilling occurred in late 1960’s, but it remains predominantly open in appearance, somewhat at odds with the prevailing rich urban townscape of the town centre.

28 The applicant has provided a townscape analysis and a separate heritage document describing the townscape and heritage impacts of the proposed development. As part of this the applicant provides 24 Accurate Visual Representation views (AVR) of the proposals as either wire line or full renders.

29 At present this particular site contributes little to the outstanding universal value of the World Heritage Site and as such there is a significant opportunity for place shaping as set out in PPS 5.

Heritage impacts

30 The design team has undertaken significant urban design and historical analysis in developing an architectural language for the scheme. The site is in the immediate context of a number of listed buildings, most notably St Alfege Church (grade I) and properties on Nelson Road, Nevada Street and King William Walk (grade II). The design rationale that underpins the proposed scale, form and massing is illustrated in detail as described in the design and access statement (page 67-80). In terms of the guidance in the WHS Management Plan the broad approach to scale, form and massing fits appropriately within the surrounding context of 2-3 storey buildings.
In most instances it is possible to determine that the impact of the proposals on the outstanding universal value of the WHS, character and appearance of the conservation area and the setting of listed buildings will be consistent with the requirement to preserve or enhance. Some further work is however required regarding view 19, which relates to the setting of St Alfege Church. Here, a wire line view is provided; however, this particular view includes both the form of St Alfege church, which sits in the context of the existing gap in the townscape of the application site and views of the spire of Our Lady Star of the Sea, Crooms Hill (grade II listed church). The analysis does not consider the importance or implications to this view in any detail. To determine the impact a full render of this view and additional closer views in the setting of St Alfege should be provided.

Strategic views

London Plan policies 4B.16 to 4B.18 and The London View Management Framework (July 2010) describes the approach to the management of strategically important views. The relevant views include view 5A London Panorama: Greenwich Park (Assessment point 5A.1 and 5A.2), and view 24 Townscape View: Island Gardens, Isle of Dogs to Royal Naval College (Assessment points 24A.1, 24A.2 and 24A.3). The applicant has considered these as part of the townscape and heritage analysis. The proposals do not result in any significant infringement on these views or result in any significant impact on the viewer’s ability to recognise and appreciate the relevant landmark within the view.

Appearance

The architecture is striking and modern and whist there is some contrast to the many elegant features of surrounding buildings, the architectural approach is sympathetic to the materiality and robustness of the surrounding conservation area and WHS buildings.

Figure 1 view from Greenwich high road (source design and access statement)
The design approach provides closure to the townscape in terms of the gap created from WWII damage and completes the perimeter block whilst creating a new route to the town centre along the railway cutting. At pre-application stage, the GLA raised particular concerns regarding the relentless nature of the northern elevation along the railway cutting. In particular that there was a need for some form of break in the treatment of the elevation to avoid the emerging design taking on an unsympathetic office appearance.
35 This elevation has changed significantly to the benefit of the scheme. A geometric approach has been adopted with recessed windows providing depth to the structure, which is accentuated from the various views on the approach to the site. Whilst the changes are positive in respect of this elevation, the selected materials for this elevation is unlikely to deliver the high quality finish expected for this sensitive location. In contrast to the Stockwell Street elevation, which is proposed as stone, the northern approach is as pre-cast concrete. The contrast would be significant, particularly as the building ages and should be reconsidered. In addition, the view analysis needs to be extended to additional front facing views of this northern elevation, including a fully rendered view of the proposals facing west from St Alfege Church.

36 Notwithstanding the above, and as raised at pre-application stage, there is still significant opportunity to further animate this elevation with an entrance point into the library from the railway cutting or through the introduction of low, medium or high level terracing/platform which may add further interest (subject to residential amenity considerations).

37 At pre-application stage, officers raised concern about the proportions of the projecting blocks that carry across along the Stockwell Street elevation and how these relate to the context of existing proportions in the street. The rationale of proportions, scale, massing and form is considered in detail in the design and access statement as referenced above, and is broadly supported.

38 At pre-application stage, officers also highlighted the need to establish the impact of the proposal on residential properties along King William Walk, which backs onto the proposals site. Test views showing appearance, scale and massing from rear gardens have not been provided. The location and impact of the loading bay on these properties should also be considered and necessary mitigation provided. These are local matters that the Council will lead on, however it is not clear where this analysis is within the documentation, or how these constraints have influenced the overall form, massing and design.

Layouts and access

39 London Plan Policy 4B.5 (and draft replacement London Plan policy 7.2) requires proposals for development to meet the highest standards of accessibility and inclusion (not just the minimum building regulation requirements). The main entrance is set back and this approach is supported and provides a welcome area of public space along Stockwell Street. The opportunity to deck over part of the cutting would also be of significant public realm benefit, but has operational restrictions that would need to be tested with Network Rail and TfL. It is however important that the opportunity for breakout space for students is clearly identified and maximised and therefore, further consideration should be provided including managing the flow of students and visitors in and out of the building at peak times and capacity testing to the front of the building or other relevant entrance points.

40 All entrances around the site appear level with improved footway along Stockwell Street, which is supported. The open approach along University Walk is suggested as the preferred design solution and should be conditioned by the Council to ensure this remains a well landscaped and open route. The Council should also condition a lighting strategy. This is particularly important around the cycle storage entrance, which is poorly located and lacking in natural surveillance.

41 At this stage it still appears that a minimum approach to access has been taken within the internal layouts of the floors. As raised at pre-app, the main concern remains the stair links between the library split levels and the short flights of stairs to link the different levels of the library, which whilst appropriate do not consider the needs of other potential users including
disabled students, visitors and lecturers. The management and location of lifts does not provide a truly inclusive approach. Lifts should be located in areas clearly and directly related to typical circulation routes without need for segregation. Blue badge parking bays are now shown on plan, which is supported subject to highway implications.

Climate change mitigation

42 London Plan policies 4A.4 to 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction, demonstration of how heating and cooling systems have been selected in accordance with the hierarchy and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy. Chapter 5 of the draft replacement London Plan echoes the policy approach already in the current London Plan.

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

Energy efficiency

44 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameter will be improved beyond the minimum values required by building regulations. Other features include the use of energy efficient lighting.

45 Based on the information provided, the proposed development is likely to approach 2010 building regulations compliance with energy efficiency measures alone, however the applicant should confirm and commit to this as a benchmark target.

District heating

46 The applicant states that there is no existing district energy network in close proximity of the site but the plant room has been designed to allow connection to a district heating scheme, should one be available along Stockwell Street in the future.

47 A communal heat network supplied from gas boilers to provide space heating and domestic hot water serving all spaces in the development (including the small commercial spaces at ground floor) is proposed. The network will be served from a single plant room.

Combined heat and power

48 Combined heat and power has been discounted due to insufficient heat load. Given the type and scale of development this is accepted in this instance.

Cooling

49 A range of passive measures are proposed to reduce the cooling demand to avoid the need for comfort cooling. This includes use of high thermal mass, high performance glazing and shading devices. Where a cooling demand does occur, chillers are proposed with the possibility of operating in free-cooling mode.

Renewable energy
50 The applicant proposes 28 sq.m. of solar thermal collectors and 150 sq.m. of photovoltaic panels. A roof drawing showing potential layout has been provided. A further reduction in carbon dioxide emissions of 1% from renewable energy will be achieved.

Energy summary

51 The applicant should provide an estimate of the overall carbon dioxide savings as well for each tier of the energy hierarchy, expressed in tonnes of carbon dioxide per annum and percentages, relative to a 2010 Building Regulations compliant development.

Climate change adaptation

52 The London Plan promotes five principles in Policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure (the corresponding draft replacement London Plan policy is policy 5.3). There are specific policies covering overheating, living roofs and water. Further guidance on these policies is given in the Mayor’s SPG Sustainable Design and Construction.

53 Policy 4A.11 and draft London Plan policy 5.11 seek major developments to incorporate living roofs and walls where feasible. Policy 4A.14 of the London Plan and Policy 5.13 of the draft replacement plan seek to ensure that surface water run-off is managed as close to its source as possible and sets out a hierarchy of preferred measures to achieve this. Policy 4A.16 of the London Plan and policy 5.15 of the draft replacement plan seek to ensure that new development has proper regard to the impacts on water demand and existing capacity by minimising the use of treated water and maximising rainwater harvesting.

54 The proposals target BREEAM ‘Excellent’ rating for the development which is supported. The key feature of the building is the passive design approach to minimise overheating and limit comfort cooling.

55 Regarding water management, the site lies in Flood Zone 1 (low risk of flooding) as defined by PPS 25 (above the 1 in 1000 year flood level provided by fluvial and tidal flooding). There is a basement under the new building with a floor level of 3.3 metres above ordnance datum, which is below the predicted 1 in 1000 year flood level. The basement will however be designed to resist external ground water levels significantly higher than the 1 in 1000 year flood event levels. Comments from the Environment Agency have not been provided at this stage.

56 Green roofs provide the main attenuation measure regarding surface water management. The applicant confirms that green roofs are being used on 70% of the building footprint. Attenuation of the run off is however to be provided in two locations, one by the provision of a tank within the basement of the new building and the other by providing oversized pipes and tanks to the rear of the building. Rainwater harvesting has been rejected at this time, although the water resources chapter of the environmental statement suggests this could be further explored.

57 The approach to climate change adaptation is broadly acceptable; however the council should consider conditions regarding green roofs and water management, such as rainwater harvesting measures, which should be further explored.

Transport for London’s comments
The development is proposed to be car free, which is supported in recognition of the site’s good accessibility. It is understood that a number of parking controls are already in place on the surrounding streets, and while some off-street parking provision is available in the form of existing public car parks, it is accepted that car trips associated with the site are likely to be very limited.

Cycle parking is being proposed to meet the demands of the total number of staff and students expected to be on site at any one time, rather than total student numbers enrolled at the University. This equates to the provision of 140 cycle parking spaces rather than 265, and while this approach may be considered acceptable, TfL would however require that the proposed spaces are regularly monitored and reviewed through the travel plan, to ensure that the level of provision remains adequate to meet the demands of the development. TfL is supportive of changing, locker and shower facilities being provided on site for staff, student and visitor use.

The Olympic Route Network (ORN) and Paralympic Route Network (PRN) will operate during the Olympic and Paralympic Games period, between June and September 2012. During this period there will be an impact on construction works, utility works and highway licensed activities if they affect the roads designated as part of the ORN/PRN and some of the surrounding streets. Other routes might also be affected and will also be required to be clear of any sort of obstruction. The site fronts onto Stockwell Street which will form part of the Alternative Olympic Route Network (AORN) during the period of the Olympic and Paralympic Games in 2012. While this is not intended to be the main route for the Games family vehicles travelling to the different venues in Greenwich, it is however intended to still be frequently used as a back-up route. It will therefore need to be ensured that those vehicles can pass through the area as efficiently as possible, without experiencing any hold ups as a result of this development.

Given the limited number of construction vehicle movements expected to be generated by the development during the period of the Olympic and Paralympic Games, it is accepted that it is unlikely to have a negative impact on the operation of the ORN. Notwithstanding this however, it will be necessary for a robust Construction Logistic Plan (CLP) to be secured for the site by condition and this will need to be approved by both TfL and the ODA alongside the Local Planning Authority prior to commencement. As part of this it will need to be demonstrated that construction vehicles will not obstruct pedestrian movements, and that the site will be made presentable in advance of the Olympics starting.

While TfL is satisfied that the development is unlikely to have a significant impact on the capacity of the DLR or local bus services, the applicant should however be aware that the proposed Greenwich Town Centre pedestrianisation scheme could potentially alter the accessibility to bus services to and from the development site in the future, as stops may be located further away.

TfL would recommend that real time information boards are provided in communal areas of the development, in order to assist staff and students with planning their journeys. Alternatively, a capped sum of £20,000 should be set aside within the s106 agreement to address this. In accordance with policy 6.7 ‘Buses, bus transits, trams’ of the draft replacement London Plan, TfL would also request that a contribution of £10,000 be secured through the s106 agreement towards bus stop accessibility improvements at the Greenwich Town Centre/ Nelson Road bus stop. Works would involve adjusting the kerb height to assist step free access, which would be beneficial to those using the proposed development. TfL supports the proposals to improve the pedestrian environment in Stockwell Street, and would recommend that they are secured through the s106 agreement.

The submitted travel plan is generally considered to be of a very high standard, and should therefore be secured, managed, monitored and enforced through the s106 agreement. In
accordance with policy 6.14 ‘Freight’ of the draft replacement London Plan, TfL would recommend that a Delivery and Servicing Plan (DSP) should also be secured for the site by condition.

65 In conclusion, subject to the above matters being satisfactorily addressed, TfL is satisfied that the proposed development could be in accordance with the transport policies of the London Plan.

**Local planning authority’s position**

66 The Council’s position is currently unknown.

**Legal considerations**

67 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**

68 There are no financial considerations at this stage.

**Conclusion**

69 London Plan policies on housing delivery, education, design, heritage, strategic views, access, climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons

- Principle of development (non compliant): further consideration regarding other land uses which are prioritised in the Council’s design brief, in particular whether the site should contribute towards housing delivery. In addition further consideration is required regarding market stall provision.

- Urban design and access (non compliant): further views testing regarding the heritage impacts as set out in the report and consideration of level changes, direct access from the railway cutting route, location of the cycle storage entrance, location of lift cores, terrace access and the proposed materials to the northern elevation and breakout space requires further consideration.

- Climate change mitigation (compliant): broadly compliant subject to breakdown of carbon savings across the various stages of the energy hierarchy.

- Climate change adaptation (compliant): the council should ensure suitable conditions regarding green roofs and water management.
- Transport (compliant): subject to securing conditions and appropriate section 106 clauses regarding construction logistics and impacts on the Olympic Route Network, Paralympic Route Network and Alternative Olympic Route Network; delivery and servicing, travel plan, contribution to docklands arrival information board and bus stop improvements as set out in this report.

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

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

- Principle of development: further clarification regarding the land use status, in particular regarding housing delivery. Consideration of the inclusions of market stall capacity within the site.

- Urban design and access: further submission of views analysis is required as set out in this report and consideration of the location of lifts in closer proximity to key circulation routes. The design team should also consider the location of the cycle storage entrance, direct access into the building from the railway cutting route, introduction of terraces along the north elevation and the proposed materials and consideration of the breakout space requirements and enlarging the entrance public realm area.

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