

# The Woolwich Triangle

in the London Borough of Greenwich

planning application no. 07/2335/O

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

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

## The proposal

A retail-led, mixed-use redevelopment of the 'Woolwich Triangle' site (*outline application*) and the demolition of the rear of the adjoining grade two listed 'Red Brick Co-op Building' (*detailed application*), to comprise retail uses (classes A1, A2, A3, A4 and A5), offices (B1a), 82 residential units and a 98-bedroom hotel; with associated parking, highway works, landscaping and public realm improvements.

## The applicant

The applicant is **Wilson Bowden Developments**, and the architect is **Chapman Taylor**.

## Strategic issues

The key issues to consider are: the **regeneration** of Woolwich town centre, local **employment, retail** provision, **affordable housing**, the **urban design** and architectural quality of the scheme, **access, transport & parking** issues, **climate change, energy** and **sustainable development**.

## Recommendation

That Greenwich Council be advised that the principle of a mixed-used development of the site is acceptable in strategic planning terms, but the submitted details on design, energy, transport/parking and the employment of local people, could be significantly improved to accord with the strategic objectives of the London Plan, as indicated in the body of this report.

## Context

1 On 29 November 2007, Greenwich Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 The application is referable under Categories 1B c and 3F of the Schedule of the Order 2000:

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.”*

3F- *“Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.”*

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

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

5 The Mayor of London’s comments on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

6 The 1.91-hectare application site forms part of Woolwich town centre, the largest town centre in Greenwich and the main centre for shopping, civic and community services within the borough.

7 The application site comprises two distinct portions of land, that occupy the north-western area of the town centre, i.e. the ‘Woolwich Triangle’, situated adjacent to and south of Woolwich High Street (A206) but north of Powis Street; and the grade two listed Red Brick Co-op Building site and surface level car park, located on the south side of Powis Street.

8 The ‘Triangle’ site is bounded predominantly by Powis Street to the south, Hare Street to the east and Woolwich High Street to the north; which form a triangle around the main area of the site -hence the ‘Woolwich Triangle’. The triangle area is characterised by:

- Properties 114-172, on the eastern side of Powis Street, which vary in age, height and design, and are predominantly in retail or commercial use. Most of the units are occupied.
- Properties 1-37, on the western side of Hare Street, are all three storeys in height in predominantly retail use with office accommodation above. The majority of the units are vacant. No.27 and nos.33-37 Hare Street are locally listed buildings.
- The ‘Furlongs Garage’ located at 125-127 Woolwich High Street extends into Mortgramit Square and no 124 Woolwich High Street. The garage comprises a car wash, workshops and forecourt shop, all of which are single storey units. No 124 Woolwich High Street is a retail unit with a residential unit above.

9 The Red Brick Co-op Building (125-153 Powis Street) lies close to the western end of Powis Street. It is a Grade II listed building used as offices and bounded by the County Court, Ferryview Health Centre, a railway line, and retail units at numbers 119 to 132 Powis Street. The rear of the building is typified by an old bakery (presently used as offices), a disused boiler house, and a surface car park to the east of the redbrick building.

10 The A205 John Wilson Street, located directly west of the site, forms part of the Transport for London Road Network, whilst the A206 Beresford Street, on the eastern side, is part of the Strategic Road Network. The site is within a short walking distance from Woolwich Arsenal railway station and several bus routes running along Hare Street and Powis Street directly serve the site and the town centre. As a result, the site records an excellent public transport accessibility level of six (on a scale of 1-6, where 1 is low and 6 is the highest), which would be enhanced further by the planned transport improvements for the area. These are a DLR extension to Woolwich Arsenal station by 2009, the introduction of Greenwich Waterfront Transit (GWT) by 2011, and a Crossrail station on the Royal Arsenal site by 2020.

## **Details of the proposal**

### Outline application:

11 Outline planning permission is sought for the means of access, layout and scale of a mixed-use development on the Woolwich Triangle site for:

- A 98-bed hotel of five-storeys (including a basement).
- An 'anchor' retail store/supermarket at ground level with basement storage.
- A series of ground and first floor levels retail units, with basements storage, fronting onto Powis Street and Hare Street.
- A total of 82 residential units distributed on the second to fifth floors of the building.
- A multi-storey car park, from the second to the seventh floors.
- A combined heat and power (CHP) facility.
- A total of 446 car parking spaces for both the residential and non-residential users (including an entrance to the supermarket from second floor). Disabled car parking (28 spaces), motorcycle and bicycle parking would also be provided within the car parking area.

### Detailed application

12 The hybrid application also seeks detailed planning permission and listed building consent for alterations to the Red Brick Co-op Building to provide retail uses on the ground and first floors, with 1,166 sq.m. of office accommodation and an associated roof terrace on the third floor. The basement of the building would be retained for storage, as would the roof at fourth floor level. The existing structures at the rear, including the old bakery would be demolished to make way for an extension of the new retail units at ground and first floors, whilst the area between these large retail units and the railway line would be laid out as a service yard to the premises.

13 A further extension is proposed to the Red Brick Building into the area adjacent to the north-west flank of the building and currently used as a surface car park. The area provides space for larger retail units at ground and first floor levels, with the roof at third floor level. A service road would separate the new building from the adjacent County Court and Health Centre, and provide vehicular access to the rear of the listed Building.

### Ancillary development

14 A principal component of the development would be the pedestrianisation and environmental improvement of Powis Street and Hare Street to provide a key link between the centre of Woolwich and the Thames riverside and encourage local residents to use the Woolwich ferry.

15 The original pedestrianisation scheme required the diversion of an existing bus route from Powis Street and Hare Street through the Ferry Roundabout. That plan has since been revised and the bus re-routing is no longer proposed. The scheme would, however, require the a relocation of the bus stop on Powis Street to avoid conflict with the proposed car park access. Its new position remains unknown.

16 Car park access would be provided along a small section of Powis Street that would not be pedestrianised, to the multi storey car park on the Triangle site. Deliveries to the retail units and hotel on the Triangle Site would be made via a service entrance located on Woolwich High Street, to the basement level of the anchor store. Deliveries to the Triangle site would be limited to a 'left in-left out' arrangement onto Woolwich High Street.

17 Deliveries to the retail units in the Red Brick Co-op Building would be made to the rear of the building via a service road linked to Powis Street. Deliveries to existing premises on 119-123 Woolwich High Road and 41 to 61 Hare Street would be made via a dedicated link on Hare Street to the existing service yard.

## Case history

18 There is no planning history relevant to the current applications.

## Strategic planning issues and relevant policies and guidance

19 The relevant issues and corresponding policies are as follows:

- Economic development/regeneration *London Plan; the Mayor's Economic Development Strategy*
- Employment *London Plan; PPG4; draft PPS4; Industrial Capacity SPG*
- Retail *London Plan; PPS6; PPG13*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG*
- Affordable housing *London Plan; PPS3; Housing SPG*
- Density *London Plan; PPS3; Housing SPG*
- Mix of uses *London Plan*
- Urban design *London Plan; PPS1*
- Historic Environment *London Plan; PPG15*
- 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)*
- Transport/parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Sustainable development *London Plan; PPS1, PPS3; PPG13; PPS22; PPS Planning and Climate Change Supplement to PPS1; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*
- River Thames/flooding *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*

20 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2006 Greenwich Unitary Development Plan and the 2004 London Plan (Consolidated with Alterations since 2004).

21 The following are also relevant material considerations:

- The Thames Gateway Interim Plan- Policy Framework/Development Prospectus, Department for Communities and Local Government, November 2006
- The Greenwich Core Strategy Issues and Options Consultation/Initial Sustainability Appraisal, February 2008
- Woolwich Interchange Planning Brief, 2002
- The Greenwich Regeneration Strategy 2006-2020
- Draft Planning Obligations Supplementary Planning Document, February 2008.

## **Economic development, regeneration and employment**

22 The London Plan identifies Woolwich as an '*Opportunity Area*' within the Thames Gateway regeneration area, and the town centre as a '*Major Centre*' in the strategic network of town centres. Opportunity Areas provide London's principal opportunities to accommodate large scale development and substantial numbers of new jobs and housing (each typically more than 5,000 jobs and/or 2500 homes), with a mixed and intensive use of land assisted by good public transport accessibility. Table 5D.1 in the London Plan indicates an employment capacity of 9,000 and a minimum 15,000 housing units in the Woolwich, Thamesmead and Charlton Riverside opportunity area for the period 2001-2016.

23 As a '*Major Centre*', Woolwich is the largest shopping and employment centre in Greenwich. Over the years, however, it has suffered a general decline in vitality, mainly due to the emergence of several out-of-town shopping centres and retail parks (including Bluewater shopping centre) within the region, the growth of competing centres in the local area, persistent shop vacancy, and a concentration of some of the most deprived neighbourhoods in Woolwich as a whole. One of the on-going problems, identified in the Greenwich Regeneration Strategy 2006-2020, was an unemployment rate higher than the London average; with Woolwich Riverside Ward recording one of the highest (i.e. 27th) unemployment rates of all Wards in London in 2005.

24 More recently, regeneration opportunities such as the 2012 Olympics, Stratford City, the Greenwich Peninsula, and a series of planned/committed transport investments, are transforming town centres in the Thames Gateway into much stronger nodes of economic activity. These town centres are becoming more attractive locations for investment in retail, leisure, entertainment and local services. Many of the Gateway housing sites are also within, or adjacent to, those established centres. Consequently, the redevelopment of town centre sites and under-utilised land across Thames Gateway is seen as the key to reviving employment, economic growth and regeneration. Regeneration objectives at the national, regional and local levels aim to encourage future investment within the Thames Gateway area, and Woolwich has been identified by Central Government as a Strategic Development Location within its '*Sustainable Communities Plan*'. The latter envisages a regeneration of the town centre would be achieved through retail-led improvements to its function and an enhancement of its designation as a '*Major Centre*' in the London Plan.

25 Like other town centres, Woolwich is undergoing a renaissance that includes significant inward investment in transportation, housing, public realm improvement and an increased retail offer for local people. These, together with the proposed redevelopment of the Royal Arsenal are reinvigorating the core of the town centre back to the vibrancy it once offered.

26 The application site currently accommodates an estimated 400 jobs, with the potential to provide a further 50, if the existing vacant floorspace were utilised. On completion, the proposed development would offer a significant number of permanent and full time equivalent employment opportunities, arising mainly from the retail floorspace, but also from the small amounts of office space included within the scheme. The employment capacity of the completed development is forecast to be around 1,800 jobs (comprising 1725 retail, 78 office and 33 hotel related). This represents a net increase in employment of nearly 1,400. In addition to the employment created directly, the development would generate off-site employment in the wider area. The number of additional jobs likely to be created off-site is estimated to be 700. Therefore, the development would provide approximately 2,000 jobs.

27 As well as new population and jobs, the development would make a positive contribution to the fulfilment of other strategic policy objectives. In particular, the need for hotel development beyond the Central Activities Zone to meet an anticipated increase in demand for hotel space in London is identified in policy 3D.7 of the London Plan. Given the current low level of hotel accommodation within Greenwich, the proposed inclusion of a hotel would attract additional visitor spending and activity to local economy and tourism in London generally.

28 In short, the development should assist in bringing about a step-change in the old perceptions of Woolwich, whilst the increased attractiveness of the town centre would deliver important benefits to support the regeneration of Greenwich, and the Thames Gateway area as a whole.

## **Retail issues**

29 Despite the outline nature of the application, it is indicated that development would provide up to 28,594 sq.m. of commercial space, comprising an anchor supermarket, ancillary office space, and other town centre uses, such as financial and professional services, food and drink establishments, and offices. This component of the scheme is subject to central government guidance in PPS6 (Town centres) and the town centre and retail development policies 3D.7 (*Supporting town centres*), 3D.2 (*Town centre development*) and 3D.3 (*Maintaining and improving retail facilities*) of the London Plan.

30 Given their town centre location, the proposed retail uses would not be subject to the need or sequential test advocated in PPS6. For their part, the London Plan policies support and encourage the location of retail, leisure and other uses in town centres; whilst discouraging them outside the town centres. In particular, the policies require borough DPD policies to encourage additional comparison goods capacity in larger town centres and convenience goods capacity in smaller centres; relate the scale of new retail, commercial and leisure development to the size and role of the town centre and its catchment; and encourage appropriate development on sites in town centres in the network.

31 The scale of retail development proposed in the application has been guided by the retail capacity identified in the *Greenwich Retail Study 2002* prepared by Donaldsons and updated by DPDS in 2005. The study concluded that there was a surplus of expenditure capacity and subsequent need for additional floorspace for both comparison and convenience shopping in Woolwich town centre. In the comparison sector, it revealed that Woolwich town centre was trading at a level below the benchmark performance for centres of similar composition and retailer profile.

Whilst the predicted retail capacity figures would adversely be affected by the downturn in global and national economic conditions in 2008, its overall conclusions are considered sound in the light of a growth in population and associated consumer expenditure.

32 In summary, the proposed development would help claw back some of the trade lost from Woolwich town centre to the surrounding centres; increase its market share, leading to overall improvements in retail performance; strengthen the retail function of the western part of the town centre; replace and modernise the existing retail accommodation; improve the town centre environment; and meet the strategic objectives for a regeneration of the area.

## Housing issues

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

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

35 Where borough councils have not yet set overall targets as required by Policy 3A.9, they should have regard to the overall London Plan targets. It may be appropriate to consider emerging policies, but the weight that can be attached to these will depend on the extent to which they have been consulted on or tested by public examination. Greenwich has no specific target in its UDP, leaving the precise level to be determined on a site by site basis, depending on the circumstances; and the Core Strategy of its Local Development Framework is at an early stage in its development.

36 The residential element of the scheme comprises the following schedule of accommodation:

<b>unit size</b>	<b>private</b>	<b>affordable</b>	<b>total (units)</b>	<b>total (hab. rooms)</b>	<b>% (hab. rooms)</b>
1-bed flat	19	9	28	56	25.3
2-bed flat	33	18	51	153	69.2
3-bed maisonette	0	3	3	12	5.5
<b>total (units)</b>	<b>52</b>	<b>30</b>	<b>82</b>	<b>221</b>	<b>100</b>
<b>total (hab. rooms)</b>	<b>137</b>	<b>84</b>	<b>221</b>	-	-
<b>% (hab. rooms)</b>	<b>62</b>	<b>38</b>	<b>100</b>	-	-

37 The 82-unit development would provide an affordable housing contribution of 38% by habitable room, to be split on a ratio of 70:30 between social rented and shared ownership tenures; i.e. 22 social rented units (comprising 6 one-bed, 13 two-bed and 3 three-bed apartments) and 8 shared ownership units (comprising 3 one-bed and 5 two bed apartments).

38 A toolkit appraisal of financial viability was submitted by GVA Grimley, on behalf of the applicant, to justify the level of affordable housing within the scheme. In its response, the consultant noted that for a site to come forward for development, its value must exceed the existing planning use value of the site. In addition, the residual site value shown must allow for the cost of acquiring the site.

39 The figures produced by the toolkit (in June 2007), indicates that the scheme would not be viable with the level of affordable housing proposed. Some additional value could be gained by providing all affordable housing as intermediate; however, it still would not make the scheme viable. A sensitivity analysis indicates that even if the housing element of the scheme were 100% market (i.e. no affordable) housing, the scheme would only be marginally viable relative to its existing planning use value. This is attributed to the high construction costs associated with the residential element of the scheme and confirmed by external surveyors. In conclusion, the toolkit demonstrates that the site could not support any additional housing. It is highly probable that the margin of viability would be squeezed further by a decline in values associated with the current economic downturn in the U.K property market, and a potential surge in the supply of new housing in and around Woolwich town centre, following a recent spate of planning approvals on sites within the locality, including 1,042 units in the Love Lane development permitted by the Council in 2007.

40 The residential element would occupy just a small proportion of the site area, so the density of development is calculated on a pro rata basis at 116 habitable rooms per hectare, which is below the indicative range stated in the London Plan density matrix for an urban site, with a public transport accessibility level of 4-6. A higher density would be justified by the strategic objective to make the most efficient use of previously used land in areas with good public transport accessibility. However, it has to be borne in mind that this is a mixed-use scheme with a hotel and housing located above car parking and retail uses. Whilst further residential could be provided, the context of the building has to be taken into account.

41 With regard to the mix of units, the development proposes only three family maisonettes, representing just 5.5% of the total provision, which is dominated by one and two-bedroom flats. The mix has been attributed to the town center location of the site and a lack of public open space for children.

### **Children's playspace**

42 The anticipated child yield for the development is 33, for which a benchmark provision of 330 sq.m. should be allocated as children's play space. An open courtyard, 1,529 sq.m. in size, is proposed at third floor level within the residential development, as are a series of enclosed private gardens at the rear of the individual units on that floor.

43 The open courtyard has ample capacity to incorporate specially designated and equipped play areas for the number of children envisaged for this development, and especially for toddlers and children under five years' old, who require close supervision and good surveillance from within the development.

### **Urban design and architectural quality**

44 The principle of a dense mixed-use development in a town centre site, renewing and upgrading its shopping offer is strongly supported. The scheme would add significantly to the vitality of the town centre, contributing to its on-going regeneration. The refurbishment of an existing listed building would also be a significant gain to the town centre.

45 The existing locally listed building makes a positive contribution to the town centre and the conservation area. If it is to be replaced, it has to be done so with a building of sufficient design quality to complement the setting of the adjacent listed building and the character of the conservation area.

46 The proposed building would have new retail units on the ground floor, with housing and car parking above. The ground floor is animated by new shop fronts, by the access cores to the residential development above and the main entrance to the hotel. The deck of the building provides amenity space for the residents. The overall planning (with the exception of the car parking) is well conceived and the provision of dual-aspect units at the residential level is welcomed. The exposed car parking to the street elevations is of concern and this part of the building should be lined with additional residential apartments. As presently submitted, the exposed side of the car parking would contribute little to the street scene and would be very visible along Powis Street, contributing little to the setting of the listed building opposite. Providing some additional mixed uses would also reduce the overall parking levels, address some of TfLs concerns and provide more housing in a very sustainable location, in close proximity to a new DLR link and the proposed Crossrail station.

47 The elevations of the building are not yet fully resolved. An attempt has been made to echo the Art Deco forms of the building that is to be demolished, and to give the Hare Street/ Powis Street corner a presence in the townscape. This has been partially successful but there appears to be little relationship between the upper parts of the building and the lower retail elevations. The overall impression veers towards pastiche, unlike the examples given in the applicants design statement. On the Powis Street elevation, a tower is proposed similar to other tower features found along the street. The applicant should investigate the use of this for additional residential accommodation.

48 The hotel building to Woolwich High Street faces onto a major road and needs to be robustly detailed given the environment. However, the opposite side of the High Street is due to be redeveloped as part of the Royal Arsenal Warren scheme and the proposed approach offers little in terms of presence or character on the Woolwich High Street. Given the aspirations to make more of this environment the existing proposals should be reconsidered with a view to providing a more distinct presence on the main road.

49 The refurbished listed building includes a large flat roofed area to the rear. This presents an opportunity to provide additional residential accommodation without harming the setting of the listed building and maximizing the development capacity of the site. At present it is proposed to accommodate some roof plant and is an under-utilisation of a key town centre site.

50 Overall, whilst there are elements to the scheme which are well considered, the case has not yet been convincingly made for the loss of existing buildings on the site and it is considered that improvements could be made to the design of the scheme which would also deliver additional residential accommodation on the site to the benefit of the town centers regeneration.

## **Access and equality issues**

51 The application is in outline, so an assessment of how the scheme would meet specific criteria, such as the Lifetime Homes standards and the 10% wheelchair accessible housing, would be undertaken at the 'reserved matters' stage; but the applicant is committed to achieving these standards, which can be secured by appropriate planning conditions. Lift access would be provided to all flats, but confirmation is required that 10% of the parking spaces would be allocated to Blue

Badge holders. A shop-mobility scheme is proposed part of the commercial development on the site.

## **Climate change mitigation and adaptation**

52 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change.

### **Mitigation**

53 Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve it.

#### Energy demand assessment/sustainable design and construction (policies 4A.2, 4A.3, 4A.4)

54 An energy strategy was submitted by the firm URS on behalf of the applicant. A review of the strategy suggests that the baseline carbon emissions should be more clearly related to 2006 Building regulations through the use of SAP modelling for the specific buildings (U-values, glazing area, air permeability etc). SBEM or other accredited software should be used to estimate the baseline emissions for the non-domestic energy usage.

55 On energy efficient design, the reduction in CO<sub>2</sub> emission achieved due to demand reduction measures, i.e. before CHP and/or renewable sources are considered, should be evaluated using SAP/SBEM (or other accredited software). The modelling should show that CO<sub>2</sub> emissions are below the requirements of the 2006 Building Regulations with demand reduction measures only.

56 The strategy provides little information on the cooling requirements of the development. The applicant should either state whether all or part of the development would be provided with active cooling. If it would, the applicant should clarify how that cooling would be provided. For those areas with no cooling, the applicant is required to clarify what measures would be undertaken to minimise/reduce the risk of overheating. These comments should apply to the different elements of the development.

#### Decentralised energy provisions (policies 4A.5 and 4A.6)

57 The energy strategy does not propose a site-wide heating network according to the energy hierarchy set out in the London Plan. A unique heating network and a single energy centre should, therefore, be adopted for the development.

58 Two separate CHP plants on each of the proposed sites have been proposed. The strategy should aim for a single CHP plant located in a single energy centre. The sizing of the plant should be included in the energy strategy.

#### Renewable energy (policy 4A.7)

59 A mix of different renewable energy systems has been proposed.

60 Solar thermal is proposed to serve the hotel and residential elements of the scheme, but its use would compete with the proposed CHP plant. As CHP is a priority, the use of solar thermal cannot be considered suitable for this development.

61 Building-integrated urban wind turbines are proposed. It is considered that the proposed turbine model is still in its development stage and little is known of its actual performance. On the information provided, this option cannot be considered robust enough to be a feasible long-term solution.

62 With regard to ground source heat pumps, their integration within the unique heating network supplied with CHP is not technically robust. This option needs to be revisited and the applicant should state more clearly which parts of the development the GSHP would be serving. It needs to be clarified whether it could be used to supply part of the cooling needs for the retail/office area. If that is the case, a unique cooling network should be looked at.

63 Overall the renewable strategy should be revisited after the consideration of a unique heating network supplying all the parts of the development.

64 Despite the submission of indicative plans for these outline proposals, it is necessary to request precise information about the roof area available for the integration of photovoltaic (PV) cells, in order to understand how much CO<sub>2</sub> could be displaced with that form of technology. More detailed drawings would help to understand any limitations of the site for the integration of PV (available roof area, building orientation etc).

#### Overall summary

65 There is a lack of modelling in the energy strategy and it is not clear how CO<sub>2</sub> emissions relate to 2006 Building regulations.

66 The strategy does not seem to commit to a single district-heating network (supplying domestic and non-domestic areas) as expected in the London Plan energy hierarchy. Two separate CHP plants are proposed, one for each of the sites. The applicant should aim for a single energy centre with a single CHP plant. The sizing of the plant should be included in an updated or supplementary energy strategy.

67 The renewable options are not robust and they should be revisited after the unique heating network is adopted. Further information should be provided regarding the possibility of integrating PV. Additional drawings would help to understand any limitations of the site for the integration of PV.

#### **Adaptation**

68 Developments are required to be adaptable to the climate they will face over their lifetime and address the five principles set out in policy 4A.9 of the London Plan. These are: to minimise overheating and contribution to heat island effects; minimise solar gain in summer; contribute to flood risk reductions, including applying sustainable drainage principles; minimise water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls, and water conservation.

#### Overheating (policy 4A.10)

69 As indicated in paragraph 55 of this report, the applicant is required to clarify what measures would be undertaken to reduce/minimise the risk of overheating for those areas with no cooling. These comments apply to the all the various elements of the development.

70 The dual-aspect design of most of the residential accommodation, looking out onto the street or onto the internal courtyard is particularly welcome and should enhance the potential for natural ventilation, and reduce internal overheating and excessive heat generation.

#### Living roofs (policy 4A.11)

71 The applicant should explore the feasibility of incorporating living roofs into the scheme before the application is referred back to the Mayor, and the local planning authority should secure their implementation by planning condition if it is appropriate to do so.

#### Sustainable drainage (policy 4A.14)

72 Due to the high intensity urban development in the vicinity of the site, the options available for the implementation of *sustainable urban drainage systems* (SUDS) are fairly limited. In addition, due to land ownership and maintenance issues concerning the local highways, the implementation of permeable paving on the proposed pedestrian areas along Powis and Hare Streets has been discounted. At present the site is 100% impermeable.

73 As a result of the various constraints on the application of SUDS, surface water discharges from the proposed development would be attenuated on-site, with surface water infiltration systems designed in accordance with BRE365 (SUDS Interim Code of Practice, July 2004). Site investigations indicate the ground conditions to be suitable for soakaways.

74 The development would not significantly alter the size of building footprint or the amount of impermeable surfacing on the site, and the proposed open courtyard and areas of new planting might slightly increase permeability on the site.

75 The proposal is to utilise the existing drainage system on site via sub-surface soakaway storage tanks that would attenuate 40% of the surface water runoff. As a result of these measures, there would be a reduction in the runoff rates generated from the site, thus reducing the probability of flooding from surcharged drains or sewers and preventing any adverse effect on adjacent properties as a result of the development.

#### Flood risk reduction

76 Although the Woolwich site is located only 200m from the south bank of the River Thames, it lies entirely outside of the Environment Agency's indicative floodplain, due to the presence of flood defences with a crest height of around 7.2m, which are above the water level of a 1 in 1000-year return period. Localised surface water flooding is possible if the capacity of the stormwater system is exceeded, or if there is a failure in the stormwater system. The terrain general slopes north-east towards the River Thames, with surface water drainage flowing eastwards along Powis Street, and to the north and east along Hare Street and Woolwich High Street. Therefore, any surface water flooding is unlikely to pond on-site.

77 It is recommended that an intrusive CCTV survey of the existing sewers beneath the site be undertaken, to determine their exact location, capacity, condition and outfall. This should be undertaken prior the final design of the storage tanks and before the applicant enters into a connection or build-over agreement with Thames Water.

#### Water conservation (Policy 4A.15)

78 London Plan policy 4A.15 requires that residential developments should achieve a maximum water use target of 105 litres of water per person per day. Given the outline nature of the principal application, no precise details have been submitted in response to this London Plan policy, however, the applicant has indicated that the layouts that are the base core issues within Eco-Homes, would be applied to the design of the proposed homes from the outset.

79 The detailed design of the proposals will consider demand reduction measures (e.g. waterless urinals or sensor controlled flushing, low flush toilets, auto shutoff taps or spray taps, and the provision of showers in residential elements).

80 Overall, the applicant aims to achieve a BREEAM sustainability rating of 'very good' or above.

## **Transport for London's comments**

81 This application was the subject of a detailed response from TfL in November 2007, in which initial concerns were raised in relation to car parking, travel plan, highway and public transport impact particularly bus services, as well as pedestrian and cycle linkages. On-going discussions and meetings have been taking place with the applicant since and an addendum report has been submitted to TfL. Although agreement has been reached on some of the above matters, it is still considered that some outstanding concerns need to be addressed before TfL can support the scheme in principle.

82 Although the level of car parking proposed on site appears to be in line with the London Plan standards, it is still considered excessive in light of the town centre location of the site, the already congested nature of the local road network and the additional car parking spaces planned by neighbouring developments for the town centre. Despite the extensive discussions with the applicant on this matter, TfL still questions the car park management and its suggested operations for which additional information has recently been requested.

83 Whilst cycle parking provision for the residential and retail elements is acceptable, TfL would re-iterate that provision of facilities for the hotel is also required, in line with TfL's cycle guidance which requires 1 space for every 10 staff. Additional detail related to the exact location and the type of facilities proposed on site is also still outstanding.

84 Although TfL welcomes the travel plan for the site, which should be secured through s106 or conditions, it is currently considered inadequate given the scale of the proposals. Whilst the draft should meet TfL's requirements contained in both the Guidance for Workplace Travel Planning and Guidance for Residential Travel Planning in London, it also lacks of commitment to strategy, measures and actions to influence development travel. A full Residential Travel Plan is required to support the Framework Travel Plan and the minimum period of the Lead Travel Plan Co-ordinator being in post and of monitoring should be five years. Whilst preliminary targets are required based on the TA and other supporting analyses, monitoring must be iTRACE and TRAVL compliant and occur at the required intervals, as set out in the TfL Guidance.

85 Further information has been provided in relation to TfL's previous concerns on trip generation and mode split assessment. Following TfL's request, further junction assessment on John Wilson Street and Haha Road has now been submitted and, following consideration, will be the subject of a separate TfL correspondence in the near future. Clarification should however still be provided as to whether the u-turning movements have been taken into account in the modelling. The results show that the John Wilson Street approach to the Ferry Roundabout will experience significant additional delay as a result of the development and this is a concern given that this is the most critical link of the junction, which is likely to suffer further from

additional capacity constraints when bus lanes are implemented for Greenwich Waterfront Transit. TfL would therefore re-iterate the need to reduce traffic impact at the Ferry Roundabout through a reduction in car parking, rather than agreeing to a proposed financial contribution as suggested by the applicant. This could also help address some of the urban design issues raised earlier in this report. Further discussions are therefore urgently required with the applicant to mitigate the impact of the development site on the highway network and avoid any abortive previously agreed as part of the Tesco development.

86 TfL was previously concerned about the impact of diverting buses through the Ferry Roundabout, which is heavily trafficked and already experiences congestion during peak periods. Although bus re-routing is no longer proposed, which is strongly supported, it is understood that the existing bus stop on Powis Street will be removed to avoid conflict with the car park access and as such, clarification should be provided with regard to its potential relocation.

87 A site assessment of the condition of existing transport amenities, located in the vicinity of the site such as bus stops and rail station, is still required by TfL to identify the exact level of accessibility improvements, and the associated funding required. Given that the future planned transport improvements for the town centre would directly benefit the site and that a significant level of public transport trips would be generated by the development, TfL would be seeking a financial contribution towards their implementation and/or their improvements, as previously requested and agreed for neighbouring development sites.

88 Following TfL's initial comments on the lack of pedestrian and cycle linkages, the submission of a pedestrian audit is welcomed. However, as previously raised in TfL's initial letter, due to the proximity of the Capital Ring path which is part of the Strategic Walk Network, and of the London Cycle Network (LCN), which is proposed to be upgraded to LCN+, TfL would still expect the applicant to contribute towards s106 funding for these infrastructure improvements. Additionally, a contribution towards the upgrading of pedestrian-crossing facilities on the A205 John Wilson Street, such as the replacement of subways with at-grade facilities, needs to be sought.

### **London Development Agency's comments**

89 The London Development Agency (LDA) supports the proposal of a mixed-use development on the site, however the benefits that which would result from the proposed development, particularly in its response to tackling barriers to employment and provision of adequate social infrastructure, are felt to be inadequate in supporting the creation of a sustainable community.

90 The applicant states that it is not necessary to contribute to employment training initiatives, given the majority of new employment would be in the retail sector. The applicant suggests that no specific training is required for employment in retail, however there is no evidence to suggest skills are only required in certain forms of employment. Indeed, Greenwich Local Labour and Business initiative (GLLaB) offers training in cash handling, teamwork, marketing, and other skills specifically related to retail. Further, the application proposes an element of financial and professional services and office use where specific qualifications may be required. The application also does not address skills required by construction workers during the construction phase of the development. GLLaB also offers construction-training courses.

91 The Economic Development Strategy identifies South East London as having some of the most deprived wards in the UK, with communities facing severe social exclusion. Improving skills is one way of insuring increased employability. London Plan (2008) policy 3B.11 "Improving

employment opportunities for Londoners” requires that opportunities provided by major new developments are used to assist in skills action and the targeting of job opportunities.

92 Local residents and businesses should benefit from the creation of jobs resulting from the construction and operational phases of the development. Initiatives to create training and employment opportunities and to utilise the goods and services of SME's and local businesses should be provided, and could be delivered by financially contributing to established initiatives such as the GLLaB. The Agency would advise the applicant reconsider the need for contribution towards these initiatives and would suggest that the Council considers the scope for formalising the requirement through a Section 106 Agreement. As part of the agreement, the developer should submit an employment and training strategy, which should cover the following elements:

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

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

94 Policy 3A.17 *“Addressing the needs of London’s diverse population”* and *“Protection and enhancement of social infrastructure and community facilities”* require the adequate provision of social infrastructure. Consideration should be given to the need for childcare facilities as a means of tackling barriers to employment. The Agency would encourage the Council to consider the scope for requesting a financial contribution towards childcare, community, education and healthcare facilities as set out in the Greenwich Planning Obligations SPD.

95 In conclusion, the LDA supports the principle of development at Woolwich Town Centre subject to the resolutions of:

96 A financial contribution towards employment and training initiatives, childcare and other social infrastructure.

## **Local planning authority’s position**

97 At the time of writing, it was still uncertain as to when this hybrid application would be reported to the planning committee at Greenwich Council or what the planning officers' recommendation was likely to be.

## **Legal considerations**

98 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Tower Hamlets Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's comments unless specifically stated.

## **Financial considerations**

99 There are no financial considerations at this stage.

## **Conclusion**

100 From a strategic planning perspective, the principle of a mixed-use development of the site is acceptable. In its existing form, however, the proposals miss the opportunity to deliver an exemplary design that would make the most efficient use of this town centre site, increase the level of residential accommodation, maximise local employment, and reduce the level of parking in a location with good and improving public transportation.

101 In addition, the applicant is specifically requested to address the energy and sustainability issues raised elsewhere in this report, and the recommendations made by Transport for London and the London Development Agency.

---

for further information, contact Planning Decisions Unit:

**Giles Dolphin, Head of Planning Decisions**

020 7983 4271 email giles.dolphin@london.gov.uk

**Colin Wilson, Strategic Planning Manager (Frameworks)**

020 7983 4783 email colin.wilson@london.gov.uk

**Justin Carr, Strategic Planning Manager (Development Decisions)**

020 7983 4895 email justin.carr@london.gov.uk

**David Blankson-Hemans, Senior Strategic Planner (case officer)**

020 7983 4268 email david.blankson-hemans@london.gov.uk

---