

11 November 2019

# Greenwich Peninsula Masterplan 2019

in the London Borough of Greenwich

planning application no. 19/2733/O

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Hybrid planning permission for the partial revision of the 2015 Masterplan for Greenwich Peninsula for up to 6,289 homes (up to 41% AH), 88,300 sq.m of commercial land uses as well as assembly and leisure uses, a hotel, health centre and a theatre. Detailed planning permission is sought for 476 homes (60% AH) together with non-residential floorspace.

## The applicant

The applicant is **Knight Dragon** and the architect is **Allies and Morrison (outline)** and **Sheppard Robson (detailed)**.

## Strategic issues summary

**Principle of development:** The principle of the mixed-use redevelopment of the site, partially revising the 2004 Masterplan and subsequent 2015 Masterplan, is supported in principle.

**Housing:** The proposed scheme would provide an additional 1,757 units across the Masterplan area when compared to the previous consent, which is strongly supported. It is also proposed to provide Large Scale Purpose Built Shared Living and Purpose Built Student Accommodation; however, no details of these products or their affordable housing offers have been provided. If these products are proposed, they must be specified, detail provided and be explicitly secured in the permission and associated Section 106.

**Affordable housing:** The scheme would provide 2,648 affordable units, equivalent to 44% by hab. room, comprising 57% London Affordable Rent and 43% Intermediate homes. The detailed phase would provide 56% affordable housing (by hab. room) and the outline phase would provide 44%. When considering the committed to or delivered homes under the previous Masterplans, the scheme would provide a peninsula-wide affordable housing offer of 30% by hab. room. Whilst the proposals improve the overall peninsula-wide affordable housing offer, the threshold for the Fast Track route is 50% as it is publicly owned land. The viability assessment submitted with the application is not sufficient to enable an assessment of the scheme's viability and GLA officers will engage with the applicant on this as a priority.

**Transport:** The proposed residential car parking exceeds London Plan and draft London Plan standards and must be reconsidered. The parking for the O2 Arena significantly exceeds draft London Plan and London Plan standards and robust justification for this is required. Further detail is also required on cycle parking, cycle and walking routes, public transport accessibility, the proposed bus station and new Jubilee line entrance as well as traffic movements.

Further information relating to **urban design** and **energy** is also required.

## Recommendation

That Greenwich Council be advised that the application does not yet fully comply with the London Plan and draft London Plan, for the reasons set out in paragraph 120. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.

## Context

1 On 23 September 2019 the Mayor of London acknowledged receipt of documents from the Royal Borough of Greenwich 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 must 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 1A, 1B, 1C and 2c 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(c): Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside of Central London and with a total floorspace of more than 15,000 square metres.
- Category 1C: Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London.
- Category 2C: Development to provide a bus or coach station and a passenger pier on the River Thames.

3 Once the Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, either to direct refusal or to allow the Council to determine it itself.

4 The environmental information for the purposes of the applicable Town and Country Planning (Environmental Impact Assessment) Regulations 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](http://www.london.gov.uk).

## Site description

6 The site sits within the centre of the Greenwich Peninsula and is bound by Millennium Way to the west, West Parkside and Central Park to the east and the Greenwich Millennium Village and St Mary Magdalen School to the south. To the southwest is the A102 Blackwall Tunnel Approach Road and to the west of this lies industrial and commercial premises and the safeguarded aggregate processing wharves at Delta Wharf and Victoria Deep Water Terminal.

7 Existing developments on the peninsula include the O2 Arena and its associated structure, car and coach parking, the North Greenwich Transport Interchange, Ravensbourne College and a number of mixed-use commercial buildings at Pier Walk and Mitre Passage. In the centre of the peninsula is Central Park; within the park are eight listed workers' cottages and the Pilot Public House. A Development Consent Order was granted in May 2018 for the Silvertown Tunnel, with construction expected to start in 2020 and opening in 2025 at the earliest. The tunnel will pass underneath the site roughly on the alignment of Edmund Halley Way.

8 The revised masterplan site sits within the 2015 Masterplan site, which itself revised the 2004 Masterplan (refer to paragraphs 19 – 24 for further details on the planning history); however, the site area excludes a number of plots which are under construction, have been completed or are subject to separate consents. The 2015 Masterplan covered five new neighbourhood areas, otherwise known as Zones A to E. The 2019 Masterplan is located centrally within the peninsula and relates predominantly to Zone A – Meridian Quays, Zone B – Upper Brickfields and Zone C – Lower Brickfields. In terms of plot numbers, the plots covered are: 6, 7, 8, 14, 15, 16, 17, 18 and 22.

9 . The site is owned by the Mayor through Greater London Authority Land and Property (GLAP) who selected Knight Dragon, through a competitive tender process, as the preferred development partner. The site sits within the Greenwich Peninsula Opportunity Area and Greenwich Regeneration area.

10 Access to the Jubilee Line is available at North Greenwich station. In addition, nine bus routes provide high frequency links south west towards Greenwich Town Centre and central London, Lewisham to the south and Charlton, Woolwich and Thamesmead to the south east. River bus services operated by Thames Clippers from North Greenwich Pier and the Emirates Airline provides a link between North Greenwich and The Royal Docks. The public transport accessibility level (PTAL) varies across the peninsula masterplan area from a highly accessible score of 6a-6b for those sites closest to North Greenwich Interchange to slightly less accessible sites scoring 3-4 towards the southern part of the site.

## **Details of the proposal**

11 Hybrid planning permission is sought for the partial revision of the 2015 Masterplan. Outline planning permission, with all matters reserved, is sought for the demolition of all buildings and the mixed-use redevelopment up to a maximum of 737,100 sq.m of floorspace comprising:

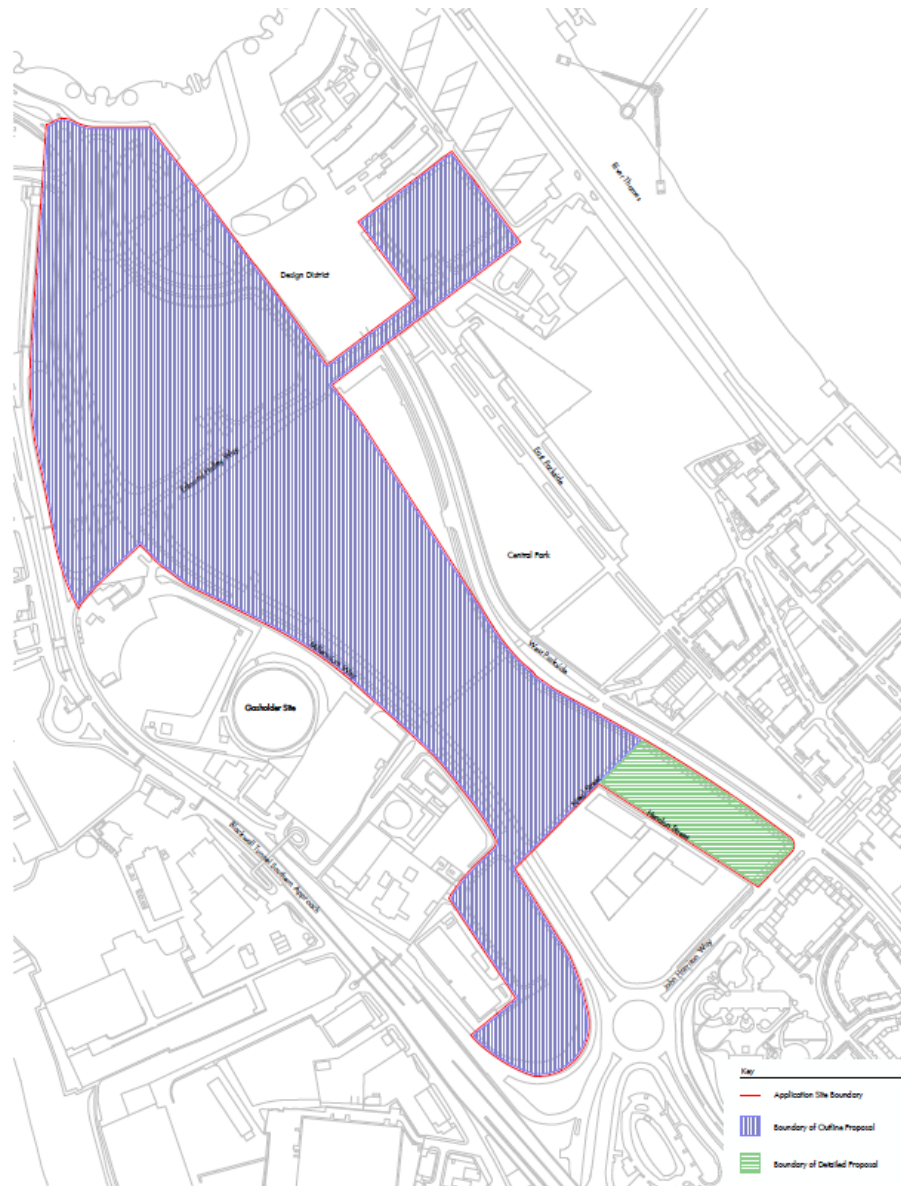
- up to 533,900sqm of residential development which includes:
  - up to 5,813 residential dwellings; and/or
  - up to 25,000 sqm student accommodation (up to 500 rooms) and/or co-living units;.
- up to 19,600sqm Class A1-A5 use (food and non-food retail, restaurants, bars and cafes);
- up to 68,700sqm Class B1 (a) (b) (c) (business);
- up to 24,200sqm Class C1 (hotel) for up to 350 rooms;
- up to 13,200 sqm Class D comprising D2 (Sport and Recreation), Class D1 (health care facilities/nursery/creche); and
- up to 8,000sqm Theatre (Class D2).

12 Outline planning permission is also sought for residential and non-residential car parking, as well as a minimum of 2,000 parking spaces for the adjacent O2 arena, cycle parking, associated community facilities, public realm and open space, hard and soft landscaping, a new transport hub and associated facilities and realignment of the cultural route traversing the site (to be known as the Tide)

13 Detailed planning permission is sought for 476 residential units, up to 100 sq.m of flexible non-residential uses (Classes A1- A3/B1/D1/D2). Ancillary car parking, access, landscaping and public realm works and associated infrastructure works are also proposed.

**Table 1:** Land uses approved under 2015 Masterplan and proposed land uses in 2019 Masterplan

	2015 Masterplan	2019 Masterplan (sq.m.)	
		Outline	Detailed
<b>Residential (Class C3)</b>	353,197	533,900 sq.m	476 units
<b>Employment (Class B1)</b>	48,193 sq.m	68,700 sq.m	100 sq.m
<b>Retail (Class A1 – A5)</b>	19,567 sq.m	19,600 sq.m	
<b>Assembly and Leisure (Class D1/D2)</b>	19,526 sq.m	13,200 sq.m	
<b>Hotel (Class C1)</b>	35,999 sq.m	24,200 sq.m	-
<b>Film studio (Sui generis)</b>	38,693 sq.m	-	-
<b>Health Care (Class D1)</b>	1,462 sq.m	1,635 sq.m	-
<b>Car parking</b>	68,297 sq.m (inc. 2,000 spaces for the o2)	65,394 sq.m (inc. 2,000 spaces for the o2)	-
<b>Theatre (sui generis)</b>	-	8,000 sq.m	-
<b>North Greenwich Interchange</b>	TBC	5,700 sq.m	-



**Figure 1** – Application boundary (blue in outline, green in detail).

## Case history

14 In 2004 an outline masterplan for the Greenwich Peninsula was granted planning permission which comprised 10,010 residential dwellings, 343,600 sq.m. of B1 offices, research and development and light industry, 60,000 sq.m. of retail, food and drink and hotel facilities (A1 to A5 and C2), 3,650 sq.m. of student accommodation and up to 29,900 sq.m. of specialist housing, in addition to a site for new secondary school and open space.

15 A further outline masterplan was granted in 2015 (GLA/0519q) which sought to revise much of the 2004 masterplan. The 2015 scheme excluded a number of already completed development plots as well as the O2 Arena and its immediate surrounds. The masterplan intensified the residential use on the site and provided for 12,678 residential dwellings. The masterplan also provided for: up to 38,693 sq.m. of film/media studios; up to 59,744 sq.m. of Use Class B1 office/employment space; up to 37,900 sq.m. of educational facilities; up to 79,780 sq.m. of retail, food and drink and hotel facilities; in addition to a new transport hub, a site for new secondary school, health facilities and various public realm works and open space.

16 In February 2017, a reserved matters application was approved for Plot 18.03 within the 2015 outline masterplan area. This comprised of 242 residential units in four blocks ranging from 3 to 26 storeys in height with 60 car parking spaces and associated landscaping. This approval has not been implemented.

17 Additionally, in March 2017 a reserved matters application was approved for Plot 18.02 within the 2015 outline masterplan area. This comprised of 220 residential units in three blocks ranging from 14 to 21 storeys in height with 41 car parking spaces and associated landscaping. As with Plot 18.03, this approval has also not been implemented.

18 GLA Officers provided initial pre-application advice on the current Masterplan revisions on 11 February 2019 (GLA ref: GLA/4983). GLA officers advised that the principle of the redevelopment was strongly supported, subject to addressing the items within that report relating to principle of development, urban design, energy and transport.

19 A further pre-application meeting was held on 28 March 2019 to discuss the detailed elements of the scheme (GLA ref: 5010). GLA officers confirmed that the principle of a high-density mixed-use development is supported but further consideration was required on the matters of affordable housing, urban design, climate change and transport as set out above.

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

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 Royal Greenwich Local Plan: Core Strategy with detailed policies (2014) and the Policies Map (2014), and the London Plan 2016 (the Spatial Development Strategy for London Consolidated with Alterations since 2011).

21 The following are also relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance;
- Draft London Plan Consolidation Version of Changes 2019, which should be taken into account on the basis explained in the NPPF;
- Draft London Plan Panel of Inspector's Report;
- The Greenwich Peninsula West Masterplan Supplementary Planning Document;
- Greenwich Site Allocations Preferred Approach August 2019;

22 The relevant strategic issues and corresponding policies and guidance are as follows:

- Principle of development *London Plan; Culture and Nighttime Economy SPG;*
- Housing *London Plan; Housing SPG; Affordable Housing and Viability SPG; Mayor's Good Practice Guide to Estate Regeneration;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*

- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy.*

## **Principle of development**

### Residential-led Masterplan in an Opportunity Area

23 Greenwich Peninsula is identified as an Opportunity Area (OA) in the London Plan (Map 2.4). London Plan Policy 2.13 states that development in OAs is expected to optimise residential and non-residential outputs and contain a mix of uses. London Plan paragraph 2.58 states that OAs are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility, which is echoed in the supporting text to draft London Plan Policy SD1. Paragraph 2.61 of the London Plan confirms that OAs are expected to make particularly significant contributions towards meeting London's housing needs. The draft London Plan identifies this OA as being within the Thames Estuary corridor, which comprises the largest concentration of OAs within the City and is an area that continues to be a priority for regeneration and economic development, with the potential for the delivery of over 250,000 new homes and 200,000 new jobs.

24 London Plan Policy 2.13 identifies Greenwich Peninsula Opportunity Area as having capacity to accommodate a minimum of 13,500 homes and 7,000 jobs. The draft London Plan notes the fast pace of development within the Greenwich Peninsula OA and through draft London Plan Policy SD1, revises the level of homes and jobs upwards, giving indicative figures of 17,000 new homes and 15,000 new jobs. Annex 1, table A1.1 of the draft London Plan also identifies North Greenwich as having potential for District Town Centre status with high commercial and residential growth potential.

25 As set out above, the proposals revisit the 2015 Masterplan (which itself is an intensified version of the original 2004 Masterplan) and develop a new masterplan that would significantly increase the total number of residential units to be delivered to 17,487 units as part of the mixed-use regeneration of the peninsula. The increase in residential units is in addition to increases in Class B1 employment space and Class A1 to A5 retail space all of which is strong supported.

### Film Studio

26 One of the key changes from the 2015 Masterplan is the removal of the film/media studio space; this facility was to provide up to 38,693 sq.m. of sui generis floorspace on a large triangular plot of land adjacent to Millennium Way. It is noted that the principle of this facility was strongly supported at the time of the 2015 Masterplan and that the proposal had received the support of the British Film Commission. Linked to the removal of the studios, the 2019 Masterplan no longer includes the provision of a visitor attraction, which was proposed to be located on Plot 14 within the Lower Riverside neighbourhood zone and tie-in with the film studio facility in terms of its theme.

27 At pre-application stage, the justification for the removal of the film studio use was because of a proposal for a large-scale film studio at an 8-hectare site in the London Borough of Barking and Dagenham. is being brought forward; however, it should be noted planning permission for this has not yet been secured for this facility.

28 It is acknowledged that a recent report into the film and tv studio property market (Sites, Camera, Action (2018)) found that the UK needs up to 177,000 sq.m. of new film studio space to meet current levels of demand. Furthermore, given that 75% of the UK film industry is based in London, this places significant demand for additional floorspace within the capital and is reflected in draft London

Plan Policy E8, which seeks to support film studio capacity in London. It is unlikely that the new facility in Barking would meet this demand alone. Notwithstanding this, it is noted that the provision of a film studio is not a requirement of strategic or local policy including the site allocation and therefore while disappointing, there are no planning reasons to object to the removal of this facility from the master plan.

29 In place of the visitor facility, the proposals provide a theatre space of up to 8,000 sq.m, which would still ensure that the Masterplan contributes towards the emerging cultural offer of North Greenwich and the aspirations of the district centre. In accordance with draft London Plan Policies E8, HC5, HC6 and the Culture and Nighttime Economy SPG, the provision of a theatre is strongly supported.

#### Employment floorspace

30 As noted above, the applicant has sought to address the loss of employment floorspace arising from the removal of the film studio space through increased provision in B1 space within the 2019 Masterplan proposals. The 2015 Masterplan would have provided up to 48,193 sq.m. of Class B1 floorspace within the site area for the 2019 Masterplan. Whereas the new proposals would see an uplift in the level of Class B1 space by c. 20,507 sq.m. to 68,870 sq.m. It is noted that the proposed employment uplift is significantly less in terms of floorspace than the film studio; however, it is acknowledged that traditional Class B1 floorspace is likely to provide higher job densities than a film studio.

31 The level of Class B1 space within the 2015 Masterplan was considered appropriate in light of figures contained within both the London Office Floorspace Projections 2014 (LOFP) and the London Office Policy Review 2012 (LOPR). A further LOPR was published in 2017, which recognised the changing nature of the office market due to increases in flexible working and Brexit-uncertainties. The latest LOPR notes that there is sufficient capacity in the pipeline to meet projected demand; however, that central locations are becoming increasingly unaffordable. In this context, the applicant should provide further information on the nature of Class B1 office products to be provided. Notwithstanding this, given the potential reclassification of North Greenwich as a District Centre, and high level of public transport accessibility, the proposed uplift in Class B1 space within the proposed Masterplan area would be supported.

#### Retail impact

32 While the Peninsula does not currently form part of London's strategic town centre network, both the London Plan and draft London Plan identify the potential reclassification of North Greenwich as a District Centre. This potential change is reflected in the Council's Core Strategy, which promotes the creation of a new leisure-led District Centre adjacent to the North Greenwich underground station. Notwithstanding this, the total quantum of town centre uses within North Greenwich, as previously approved through the extant 2004 and 2015 masterplans, would significantly exceed the upper floorspace limit of 50,000 sq.m. for District Centre as set out in the London Plan and the draft London Plan. Nevertheless, the new Masterplan proposals would see a minimal uplift in retail provision when compared to the 2015 Masterplan. The additional provision is understood to be intended to cater for workers and residents, with the uplift driven by the respective uplifts in residential units and business space and is considered acceptable.

#### Principle of development conclusion

33 Given that the 2004 and 2015 consents broadly established the principle of the proposed mix of land uses and, in light of the peninsula's OA status within the London Plan and draft London Plan, the principle of the large-scale mixed-use redevelopment of Greenwich Peninsula, which would deliver a significant number of homes and jobs, is supported in principle, subject to addressing the issues set out within this report.



## Housing

34 London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase the supply of housing in the capital. The proposed scheme would provide up to 6,289 homes, which equates to 23% for the ten-year target of 26,850, set out in the London Plan. When considering previous consent, the scheme provides 1,757 additional homes, which is equivalent to 7% of the London Plan’s ten-year target. The increase in the housing targets identified in the draft London Plan evidences the continued need for housing in the borough.

35 Table 2 illustrates the permitted level of affordable housing for each successive Masterplan. The proposed 2019 Masterplan results in an overall 17,487 homes across the peninsula, whereas the 2015 Masterplan proposed a maximum of 15,730 homes (including homes delivered under 2004 Masterplan); as such, the 2019 Masterplan proposes an additional 1,757 units across the site, when compared to the 2015 position. For clarity, it is worth noting that, whilst the 2019 Masterplan seeks planning permission for up to 6,289 homes, only 1,757 of these are genuine “additionality”, with the remainder being a result of the part revision of the 2015 Masterplan. When considering the uplift, 54% of the 1,757 units are affordable; this, in turn, aides in increasing the overall affordable housing provision across the peninsula area, as discussed in the paragraph above.

**Table 2 – Approved levels of affordable housing in successive Masterplans**

	<b>2004 Masterplan</b>	<b>2015 Masterplan</b>	<b>Total 2015 Masterplan + delivered 2004 Masterplan units</b>	<b>2019 Masterplan</b>	<b>Additional units over permitted 2015 masterplan</b>
<b>Units</b>	2,832	12,898	15,730	17,487	+1,757
<b>AH</b>	1,002	2,928	3,930	4,880	+ 950

36 It is noted that the description of development includes Large Scale Purpose Built Shared Living as well as Purpose Built Student Accommodation within the housing figures; however, neither student accommodation or purpose-built shared living units are considered to be C3 residential uses and therefore different London Plan and draft London Plan policies apply to these uses. These are considered in turn below.

### *Purpose built student accommodation (PBSA)*

37 London Plan Policy 3.8 states that strategic and local requirements for student housing meeting a demonstrable need are to be addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes. Policy H17 of the draft London Plan states that boroughs should ensure that local and strategic need for such accommodation is addressed, provided that it contributes to mixed neighbourhoods; is secured for students; is secured for occupation by one or more higher education institution; provides 50% affordable student bedrooms, where developments lie on public land; provides adequate living space; and is well-connected to local services. Policy H17 also encourages provision in well-connected locations away from existing concentrations in central London. Paragraph 4.17.1 of the draft London Plan identifies that purpose-built student accommodation (PBSA) contributes to meeting London’s housing need, and that every three student bedrooms equate to meeting the same need that one conventional housing unit meets, and therefore contribute to a borough’s housing targets.

38 The application includes flexibility to provide up to 25,000 sq.m of PBSA which would indicatively provide approximately 500 bedspaces. No detail on any student accommodation offer has been provided, including any level of affordability. In respect of student housing need, no detail has been provided demonstrating a local requirement or demand for student housing in the proposed location. This need would need to be evidenced as part of any forthcoming reserved matters application and supported with a nomination agreement with a higher education institution.

39 Whilst it is acknowledged within the draft London Plan that student accommodation can be considered to count towards a borough's housing targets, the GLA consider PBSA to be a sui generis use class and, as such, must be explicitly referred to within planning permission and the s106 agreement, rather than part of the broader housing offer. Furthermore, if PBSA is proposed within the development, the applicant must confirm the affordable student housing offer as well as recalculating the conventional housing and affordable housing offer to recognise the carving out of PBSA floorspace / units.

40 Given the wider Masterplan proposals, the introduction of student accommodation is likely to contribute to the vitality of the new local centre and would be well connected to the local services provided; however, the above issues must be addressed before GLA officers can comment on the acceptability of this element of the proposals.

#### Large Scale purpose-built shared living

41 Draft London Plan Policy H18 supports large-scale purpose-built shared living (LSPBSL) accommodation where it is of good quality and design; contributes towards mixed and inclusive neighbourhoods; is well-connected to local services and employment by walking, cycling and public transport, and does not contribute to car dependency; is under single management; has minimum tenancy lengths of no less than three months; has sufficient communal facilities and services; provide adequate functional living space and layout; and are not self-contained homes or capable of being used as self-contained homes. A cash in lieu contribution would be required towards conventional C3 affordable housing, either as an upfront payment, or an annual in perpetuity payment. The cash-in-lieu payment would be equivalent to 50% of the units because the site is in public ownership. All LSPBSL schemes are subject to the Viability Tested Route.

42 Like the student accommodation, the proposal seeks permission for up to 25,000 sq.m of LSPBSL floorspace, which is also considered to be a sui generis land use. As such, as above, if LSPBSL is proposed it must be carved out of the overall residential offer as well as the affordable housing offer. GLA officers will robustly review the applicant's financial viability assessment (as discussed in more detail in paragraph 57 below); however, if either LSPBSL or PBSA are proposed, they must be considered within the viability assessments and secured within permission and the s106 agreement.

43 Key to the acceptability of this form of housing is the quality of the residential accommodation provided. If this product is proposed, further detail should be provided within the Design Code setting out design standards, particularly regarding size and layout of private living spaces and both internal and external shared amenity/communal spaces. Operation under single management, minimum tenancy length and details of access to communal facilities and services should also be secured in the S106 agreement. No information has been submitted to support this offer and GLA officers cannot confirm at this stage whether the inclusion of this use within the Masterplan is acceptable.

*Housing conclusion*

44 In this context, the principle of an uplift in conventional residential uses across the Masterplan is strongly supported; however, whilst the need to diversify the housing offer within the scheme is acknowledged, insufficient information has been provided on sui generis large scale purpose built shared living or purpose built student accommodation for GLA officers to fully comment on the acceptability of these uses.

**Affordable Housing**

45 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor’s Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6. Schemes on public land that provide 50% affordable housing and meet the specified tenure mix are not required to submit viability information nor be subject to a late stage review.

*Overall affordable offer*

46 The applicant is proposing to provide 2,648 affordable units within the 2019 Masterplan application equating to 42% by unit or 44% by habitable room. The overall Masterplan offer comprises 57% London Affordable Rent and 43% Intermediate homes (by hab. room). The land is in public ownership and therefore, the scheme triggers the 50% threshold for the Fast Track route. The applicant’s FVA will be robustly reviewed to ascertain the maximum amount of affordable housing that the scheme could provide. At a local level, the Council seeks to ensure split of 70% affordable rent and 30% intermediate; as such (and subject to confirmation from the council), the scheme does not comply with the tenure split requirements, as set out in draft London Plan H7.

**Table 3 – Residential provision in successive Masterplans across peninsula**

	2004 Masterplan		2015 Masterplan		Cumulative total committed or delivered 2004 + 2015	Proposed 2019 Masterplan			TOTAL
	Permitted	Delivered	Permitted	Delivered or committed		Outline	Detail	Total	
<b>Units</b>	10,010	2,832 (inc. 260 units to be built)	12,898	8,366	<b>11,198</b>	5,813	476	6,289	<b>17,487</b>
<b>Affordable</b>	3,803	1,002	2,928	1,230	<b>2,232</b>	2,383	265	2,648	<b>4,880</b>
<b>Affordable %</b>	38%*	37% (or 34% when including 260 additional units)	23%	15%	<b>20%</b>	41%	56%	42%	<b>28% (30% by hab. room)</b>

\* Offer relied on grant funding, which was later determined to be unavailable.

47 As the scheme forms part of a wider Masterplan, it is also relevant to consider the affordable housing across the peninsula. The 2015 Masterplan proposed 23% affordable housing, comprised of 70% Affordable Rent and 30% Intermediate units; however, in terms of present delivery, the number of units committed to or delivered up to now is 11,198 homes, of which 20% were affordable (as shown in table 2). Taking the percentage of affordable housing both proposed and delivered under the 2004 Masterplan and 2015 Masterplan, the 2019 Masterplan would result in a peninsula-wide affordable housing offer of 28% by unit or 30% by habitable room.

#### *Detailed*

48 The detailed element of the proposals would provide 476 homes, of which 56% would be affordable (60% by hab. room), comprised of 109 London Affordable Rent units and 156 Shared Ownership units. The applicant should confirm whether this affordable housing offer uses grant funding. Where grant funding is utilised, the applicant must commit to providing the proposed level of affordable housing with no 'fall back' offer through the s106 agreement.

49 The previous, and now lapsed, reserved matters applications for the sites proposed 462 residential units, of which 25% were affordable; as such, the proposals are a significant improvement to that position and are strongly supported.

50 It is noted that the applicant considers that the detailed element of the scheme is eligible for the Fast Track Route in the planning statement: whilst the affordable housing offer on the detailed element of the scheme exceeds the threshold level for the Fast Track route for public land, the overall affordable housing across the application area falls short and, therefore, the site-wide viability will be assessed. Further commentary on the viability assessment is provided at paragraph 57.

51 No detail on the shared ownership units have been provided. For the avoidance of doubt, the Mayor is clear that London Shared Ownership, which is the preferred intermediate-for-sale product, should be available to households on a range of incomes below the £90,000 threshold. The range of incomes should be secured in the s106 agreement.

#### *Outline*

52 The outline element of the proposals would provide up to 5,813 homes, of which 41% by unit, or 44% by habitable room, would be affordable. Of these units, 52% would be London Affordable Rent and 48% would be intermediate. The provision of London Affordable Rent as the affordable rented product is supported, as it is the Mayor's preferred affordable housing product.

53 It is proposed that the intermediate products would be comprised of intermediate-for-rent and intermediate-for-sale. No details on these products have been provided. As noted above, London Shared Ownership is the Mayor's preferred intermediate-for-sale product and these should be available to households on a range of incomes below the £90,000 threshold. The preferred intermediate-for-rent product is London Living Rent and the income cap for intermediate rented products is £60,000 per annum. The applicant should confirm the intermediate housing products proposed and the rental levels/incomes thresholds. The rental levels, as well as the income thresholds, must be secured in any s106 agreement. Furthermore, the applicant must confirm whether they have engaged a Registered Provider to manage the affordable units.

54 Details of the phasing must be provided. It is noted that the 2015 Masterplan required an element of affordable housing on every plot; however, the applicant wishes to enable the provision of affordable housing within each neighbourhood, a broader area than each plot. It is expected that homes affordable homes are provided throughout a development, in order to contribute to mixed

and balanced communities, and are indistinguishable from market homes. The applicant must provide further information before the acceptability of the proposals can be commented on.

55 An early stage review must be secured in any s106 agreement, triggered if substantial implementation has not been undertaken within an agreed period following the grant of planning permission. If the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. Given this is a longer-term phased scheme, it may also be appropriate to secure a mid-point reviews triggered after implementation of each phase. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the SPG.

56 The Council must publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available to ensure transparency of information.

#### Viability assessment

57 The viability assessment submitted with the application is not sufficient to enable an assessment of the scheme's viability, for a number of reasons, including:

- very limited viability information has been provided and it is not clear how the outline element is being assessed. It appears that this element has simply been incorporated within an appraisal of an updated version of the 2015 masterplan although elements of this are excluded from the current application. A plot by plot explanation on how the current application relates to the 2015 masterplan should be provided;
- no information has been provided within the viability assessment to support any of the inputs used in the appraisals and this should be provided in line with the guidance set out in the Mayor's Affordable Housing and Viability SPG;
- particular concerns about the following assumptions which both have a significant impact on viability: the land value has been included in the appraisals without any explanation. The approach to Benchmark Land Value should be based on the AH&V SPG and the latest Planning Practice Guidance and a full rationale provided; and a target profit of 20% IRR has been assumed, based on the review mechanism in the s106 agreement for the 2015 scheme. Although an IRR approach is acceptable on a scheme of this size, a rate of 12-14% would be more appropriate; and
- further information on the inclusion of grant is required.

58 The GLA will provide detailed comments separately, setting out the information required, and will engage with the applicant as a priority.

#### Housing mix

59 London Plan Policy 3.8 and draft London Plan Policy H12 promote housing choice in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. London Plan Policy 3.11 and draft London Plan Policy H12 state that priority should be accorded to the provision of affordable family housing.

**Table 4:** Proposed housing mix and tenures

	<b>Studio</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed +</b>	<b>Total</b>
<b>Detailed</b>						
Market	35	75	87	16	-	<b>211</b>
Affordable rent	-	46	19	27	17	<b>109</b>
Shared ownership	16	72	59	9	-	<b>156</b>
<b>Outline</b>						
All tenures	Up to 20%	20 – 50%	40 – 50%	5 – 15%		<b>Up to 5,813 units</b>

60 The scheme proposes up to 6,289 units across a range of unit sizes. In the detailed element, 15% of units are family-sized, which rises to 20% in the affordable tenures and is supported. Within the outline phase, the majority of units are to be 1 or 2 bedroom units, with up to 15% family-sized accommodation. In any subsequent reserved matters application it would be expected that the affordable housing would be provide across a range of unit sizes that meets local needs. The applicant should confirm that the proposed mix meets an identified need, particularly in the affordable tenure.

#### Residential quality

61 London Plan Policy 3.5 and Policy D4 of the draft London Plan promotes quality in new housing provision, with further guidance provided in the Housing SPG. In accordance with strategic priorities, it is essential that schemes deliver the highest standard of residential quality, and baseline standards are exceeded wherever possible.

#### *Detailed*

62 The block formation allows for the creation of efficient floorplates with an appropriate number of residential units per core within the taller blocks. There are a number of north-facing units in Block A and the applicant should explore opportunities to enhance the residential quality of these units.

#### *Outline*

63 The Design Guidance must include firm commitments to meeting national minimum space standards, amenity space standards, as well as the standards set out within the Housing SPG.

64 Additionally, all buildings should maximise the amount of active frontage onto the proposed public realm where possible to encourage natural surveillance and where residential uses are at ground level, individual front entrances to the residential units should be provided in accordance with the design principles set out in the Housing SPG. In this regard, the wording within the Design Guidance should be strengthened to require future reserve matters applications to maximise active frontage through, for example, setting maximum amounts of continuous inactive frontage.

65 London Plan Policy 7.15 and draft London Plan Policy D13 seek to reduce and manage noise associated with development, as well as mitigating and minimising the impact of existing noise on new development. Noting the proximity of major roads and the Silvertown Tunnel, the applicant should confirm how noise from the major roads surrounding the site will be mitigated to ensure good residential quality.

#### Inclusive access

66 London Plan Policy 3.8 and draft London Plan Policy D5 requires that at least 10% of units within new build schemes are wheelchair accessible and the remaining 90% are wheelchair adaptable. It is proposed to provide 10% wheelchair accessible dwellings; however, the applicant must confirm that these will be comprised of a range of unit sizes and be distributed throughout the building to ensure parity in choices for wheelchair users. The provision of these units must be secured within the s106 agreement and, for the outline phases, explicitly required by the Design Guidance.

#### Children's playspace

67 London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Play and Recreation SPG expects all new residential developments to incorporate good quality, accessible play provision for all ages of a minimum of 10 sq.m. per child.

68 With the detailed element, it is proposed to provide playspace on for under 5s on the first floor podiums garden, with the space between buildings being used for older children's play. The applicant should confirm the total quantum of playspace proposed in the detailed element and that all residents have access to all areas of playspace, in line with draft London Plan Policy S4.

69 For the outline element of the scheme, the Design and Access statement notes that at least the minimum amount required, as set out in the SPG (or any amended documents), will be provided. The provision of at least a policy compliant level of playspace must be secured within the s106 agreement and then retained in perpetuity. The applicant should also provide details of the distribution of units by tenure across the site to demonstrate that the proposed play space is not segregated by tenure, in accordance with Policy S4 of the draft London Plan.

## **Urban design**

70 Good design is central to all objectives of the London Plan, the objective to create a city of diverse, strong, secure and accessible neighbourhoods, to which Londoners feel attached whatever their origin, background, age or status. These objectives are mirrored in the draft London Plan, with the concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, the bedrock of the plan. Policies contained within chapter seven of the London Plan, and chapter 3 of the draft London Plan, specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods. It sets out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this. It should be noted that Policy D11 of the draft London Plan introduces measures relating to fire safety that must be addressed via the planning process.

#### Site layout

##### *Detailed*

71 The broad layout principles of the previous reserved matters approvals have been followed, which provide clear definition between the two plots and allows for an east-west route through the site

and aligning with the School entrance that lies to the south of the site. The northern plot has been segmented into three buildings, whilst the south building has been divided into four buildings. Between the plots it is proposed to provide an east/west route and each plot itself is linked by a podium garden, upon which amenity and play space would be located. The tallest element of each plot is located to the north, addressing existing street vistas on the eastern side of the peninsula.

72 The applicant should demonstrate how the east-west route will be activated at ground level and how the public realm/landscaping strategy will be fully integrated into the wider street network. It is noted that Hendon Street on the western side of the detailed element would link with the central street at the heart of the wider masterplan area, to be known as Brickfields Street. Brickfields Street seeks to provide a pedestrian focused north-south route through the peninsula. Hendon Street would remain open to vehicular traffic due to school access requirements; however, this route is the key to defining and continuing the character of the Brickfields Street. Further information on the interface between the outline and detailed elements should be provided, noting the importance of this route to the development as well as the fact that the northern elevation of the detailed plot is relatively inactive, with loading bays and access into the car park.

73 While the block form generally allows for appropriate separation distances between each of the blocks, a few close relationships are noticeable (in some cases 6.9 metres); it should be demonstrated that these tight relationships do not compromise residential quality. Individual front entrances are shown where residential uses are at ground floor level, in accordance with the design principles set out in the Housing SPG. The provision of individual entrances on West Parkside ensure that there is some passive surveillance onto the street and the central park beyond.

#### *Outline element*

74 The 2004 Masterplan was based around a radial structure emanating out from O2 Arena with a large park at the heart of the site. The 2015 Masterplan moved away from this radial structure towards a more regular grid pattern and featured an expanded central park. The key differences, in terms of layout, between the 2015 Masterplan and the 2019 Masterplan are the following:

- Removal of the film studios and the extension of residential uses into this area;
- Increase in community, leisure and employment uses;
- Introduction of theatre;
- Splitting of the AEG (the O2) car parking into two buildings to enable north/south connection of Brickfields to continue up to the station;
- Realignment of Edmund Halley Way, responding to the approval of the Silvertown Tunnel; and
- Reconfiguration of the bus station to make a better use of land and enhance permeability.

75 The replacement of the Film Studios with smaller residential blocks represents one of the key changes from the 2015 to 2019 Masterplan and has allowed for increased permeability and legibility, particularly for east-west routes from West Parkside to Millennium Way. The recent planning brief for the gas holder site immediately to the west of the Masterplan area and Millennium Way will act to further emphasise the improved east-west permeability on the peninsula. Opportunities to integrate the masterplan with the emerging proposals for this gasholder site, in conjunction with activation onto the eastern side of Millennium Way, should therefore be maximised and the applicant must demonstrate how this elevation has been future-proofed. Whilst the indicative proposals to separate the function of these new east-west connections between pedestrian and vehicular routes is supported, further development of these routes in order to establish a clear spatial hierarchy is encouraged.



76 Further to the improved east-west connectivity, the 2019 Masterplan would also significantly improve the north-south pedestrian experience through the Brickfields neighbourhood zone with the introduction of a Central Street, which would now run up to the station. The new route would be largely car free from St Mary Magdalene School at its southern extent up to Edmund Halley Way and Peninsula Place at the north of the masterplan site. Towards the north of the Brickfield neighbourhood, Central Street would widen and merge into a new communal square. The proposals to demark this square within the townscape through the provision of a taller building(s) would improve local legibility and are therefore supported.

77 The layout and form of the new Transport Interchange, and in particular the Bus Station, are subject to further discussion between the applicant, TfL and the LPA and as such it is not yet clear how the proposals will integrate Central Street (and the Brickfields residential area), Edmund Halley Way and North Greenwich Station/O2 Arena to the north. However, the continuation of the pedestrian focused character of Central Street northwards through the Peninsula Place zone is strongly encouraged. Notwithstanding this, the legibility of this new north-south route would potentially be compromised as it crosses Edmund Halley Way which, due to the passing of the newly consented Silvertown Tunnel directly beneath, forms a relatively sparse east-west channel through the heart of the masterplan area. Further detail of the design of this interface should be included within the Design Guidance.

78 The existing 2,000 plus surface level car parking spaces serving, the O2 Arena would be re-provided within two separate Multi-Storey Car Parks (MSCP) to the north and south of Edmund Halley Way. The 2015 Masterplan saw these 2,000 spaces incorporated into one single MSCP; however, the separation of the spaces into two separate plots is supported as this allows for a more comfortable integration into the surrounding townscape and, should the necessity for this level of parking decrease in future, the possible removal of one of the MSCPs in its entirety.

79 The parameter plans delineate the development into a number of plots and in two neighbourhoods: Brickfields to the south, which is primarily residential in use; and Peninsula South to the north, which is more varied in terms of land uses and includes the entirely commercial plots 7, 8, 9 and 12.01. Parameter plans also control the following: street hierarchy; ground level uses; maximum building heights; and maximum basement extents. Furthermore, the Design Guidelines provide detailed codes for the reserved matters applications, noting that all items are reserved; the Council should ensure that all reserved matters comply with the design codes.

## Height, massing and scale

### *Detailed*

80 It is proposed to generate a variety of building heights across the site from east to west. The tallest elements of the scheme are located in Block A and Block E, with the greatest height located fronting Central Park. The townhouses along Hendon Street respond to the scale and massing of St. Mary Magdalene School while the taller elements, reaching up to 30 storeys in Block A, respond to the emerging park edge conditions being delivered through the wider masterplan area. The differentiation of the massing of the towers at the upper levels is supported and would also add further interest to the buildings.

### *Outline*

81 The principals for height and scale generally follow the design guidelines and height strategy approved as part of the 2015 Masterplan. Towards the centre of the site, and within the Brickfields neighbourhood zone in particular, taller elements are generally focused on the park edge with moderation in height towards Central Street and then additional height for those buildings addressing Millennium Way.

82 Whilst the above approach is supported, the introduction of residential use on the former film studio site has placed further demands on the relatively dense built form in the northern part of the Brickfields neighbourhood. It is noted, however, that the Design Guidelines require each plot within the Brickfields are to be comprised of various heights, which should aid in modulating and distributing building heights. However, given the importance of Central Street to the legibility and the wider success of the proposals, further evidence should be provided to demonstrate that the Central park will be suitably legible and that the flats will receive sufficient daylight and sunlight.

### Architectural approach

#### *Detailed*

83 Three buildings typologies would be utilised in the detailed phase - taller point blocks, mid-scale mansion blocks and three storey mansion blocks. The towers would employ a modular grid form with integrated balconies. Further clarification of the facade materials should be provided. The brick-built townhouses and mansion blocks follow the simple yet high-quality approach, with contrasting vertical and horizontal emphasis across both styles which is assisted by patinated brickwork. Overall the design approach is supported.

#### *Outline*

84 As prevalent throughout much of the peninsula, the proposals would employ mixed-block typologies throughout the Brickfields neighbourhood. The Design Guidelines provides some limited guidance on physical appearance and provides some information on the form and composition of buildings; however, these should be expanded upon to provide further discussion regarding the likely materials and further details on the architectural approach, including, for example, fenestration and balcony strategies.

### Open space and public realm

#### *Outline*

85 Given the increased residential density of the Masterplan area, the application should demonstrate how the additional pressure on the proposed open spaces can be successfully accommodated. The landscaping and planting strategy will be fundamental to creating a pleasant living environment owing to the visual amenity value trees and plants provide and the role mature planting plays in moderating the perceived scale of development.

86 Through the Design Guidance, the applicant should demonstrate how these buildings will help animate the public realm and encourage a safe and enjoyable environment for future residents. The ground floor uses along Central Street should be carefully considered and the applicant is encouraged to incorporate various public or community uses at ground floor level, interspersed with commercial uses, so as to help diversify the public realm and cultivate local character and a sense of place.

87 The proposed leisure and communal spaces at rooftop level, and above the MSCPs, are supported. Nevertheless, these should be provided as a supplement (rather than a replacement) for high quality communal and play space at ground floor level. As set out above, further details regarding the total amount of playspace is proposed.

## Urban greening

### *Detailed*

88 In accordance with London Plan Policy 5.10 and Policy G5 of the draft London Plan, the proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The detailed element of the proposal has an UGF of 0.27, which falls short of the target of 0.4 for residential-led schemes. The applicant should explore opportunities to maximise greening on the site.

### *Outline*

89 The outline element of the scheme is expected to achieve a UGF of 0.19, which also falls short of the target of 0.4 for residential led schemes and also short of 0.3 for commercial schemes; however, it is noted that the plots within the Peninsula Central area will all achieve UGF of 0.4 which is welcomed. The applicant must explore opportunities to enhance the Brickfields area of the outline scheme to ensure all plots meet the 0.4 UGF.

## **Energy**

90 The applicant has followed the energy hierarchy, which is supported; however, further information is required before the proposals can be considered fully acceptable in line with London Plan Policy 5.9 and draft London Plan Policy S12. In terms of the 'be lean' element of the hierarchy, the applicant should re-run the overheating calculations and note the items that must be provided in each subsequent reserved matters application.

91 For 'be clean', the applicant has identified that the Pinnacle Power district heating network is within the vicinity and is proposing to connect to this network, which is supported. Further details are, however, required. For 'be green', the applicant has investigated a range of renewable energy technologies and is proposing to install photovoltaic panels.

92 The domestic carbon savings are currently projected to be 66% compared with a 2013 Building Regulations compliant development, which exceeds the target set out within London Plan Policy 5.2; however, as all domestic buildings are required to meet the zero-carbon target, the remaining regulated CO2 emissions should be met through a contribution to the borough's offset fund (and for the outline element, this figure should be calculated at the reserved matters stage). The non-domestic carbon savings will be 58%, which is supported, but will need to be demonstrated in each subsequent RMA.

## **Transport**

### Transport assessment

93 TfL's Transport Assessment guidance was revised earlier this year to reflect Mayoral priorities of encouraging "Active Travel" and supporting a "Vision Zero" approach to road safety. The Transport Assessment does not follow this guidance, as requested at pre-application stage and detailed elements of the assessment are commented on under relevant sub-headings below.

## Walking and the public realm

### *Detailed*

94 A good quantity of footway is afforded to pedestrians across the whole site, with a pedestrian and “slow cyclist” east-west route between the plots. Good pedestrian crossings exist at key points around the site and the walking routes to key points such as North Greenwich station are of acceptable quality. Phasing of the outline element and any interim or meanwhile uses must ensure that these routes are maintained throughout the development of the masterplan area.

### *Outline*

95 The high-level principles for public spaces and walking throughout the area are welcomed, however they must be secured through appropriate conditions or obligations attached to any permission granted. Traffic modelling will be examined in detail to ensure that appropriate levels of priority have been afforded to pedestrians within road junctions. Further detail on the proposed North Greenwich station square should be provided.

## Cycling

### *Detailed*

96 The cycle parking layouts and access do not comply with the standards set out within the London Cycling Design Standards, as is required by both adopted and draft London Plan. Specifically, no spaces are provided for wider/larger cycles (including adapted cycles for disabled cyclists), and a high proportion of stands that are unsuitable for children’s cycles or difficult to use; this must be addressed at application stage, rather than through a condition.

97 The detailed elements of the development are close to an off-carriageway section of the National Cycle Network alongside John Harrison Way, which connects to a riverside cycle route on the east side of the peninsular, and Greenwich town centre to the west. No further detail is provided. An off-carriageway cycle route currently exists on the western footway of West Parkside, though is not acknowledged in text or plans, and the retention or suitable relocation of this route, ensuring good cycle connections to North Greenwich station and the bus station, should be secured. Additional good-quality routes should be secured to other destinations such as Greenwich town centre and areas to the east and south of the Peninsula.

### *Outline*

98 The commitment to meet draft London Plan standards for cycle parking in terms of quantity and quality is welcomed, as is the proposal to provide a cycle superhub at North Greenwich station. The minimum parking capacity, however, should be determined at this stage; this should be included as one of the agreed design parameters or through a method agreed at this stage for assessing the required capacity at reserved matters stage. Furthermore, cycle parking must also be secured at the existing and proposed riverbus piers.

99 Strategic Cycle routes are acknowledged by the applicant in the TA and Design and Access Statement; however, they contain little information on local connections within and to/from the site. For example, only one cycle connection is proposed (or existing connection acknowledged) across Central Park, and none on direct routes to the existing and proposed riverbus piers; this information should be provided.

## Car parking

### *Detailed*

100 A total of 44 spaces residents' parking spaces are proposed in the detailed phase, representing a ratio of 9% compared to residential unit numbers, which fails to comply with the car-free ambitions of the London Plan or draft London Plan. The scheme provides sufficient car parking for Blue Badge holders.

101 Electric vehicle charging points are proposed at policy compliant levels, a Parking Design and Management Plan should be supplied to confirm, among other things, how passive provision will be brought into active use and to ensure electric charging is available in the disabled parking spaces.

### *Outline - Residential parking*

102 It is proposed to provide car parking for residents and for use of The O2. It is proposed to provide 1 parking space for every 10 residential units, which has reduced from the 25% parking ratio granted in the 2015 permission; however, Policy 6.1 of the draft London Plan requires that residential development in an Inner London Opportunity Area should be car-free aside from parking for disabled persons therefore the applicant must amend the proposal to remove non-blue badge residential car parking. It further specifies that parking for disabled persons should be provided as a minimum level of 3% of homes and increased to 10% if required; a Parking Design and Management Plan should be provided to manage this process. The proposed ratio is therefore in line with the maximum required level of parking for disabled person and should be secured appropriately.

103 Notwithstanding the potential need to convert on-street spaces to disabled persons parking spaces, provision for visitor parking is acceptable in the very low numbers proposed provided that this is controlled and time-limited. Space should also be set aside for car-club vehicles to support the otherwise car-free living of residents.

### *Outline - The O2*

104 The 2015 outline planning permission gave approval for the provision of a minimum of 2,000 spaces for visitors to The O2 (up to 1,300 for events and 700 for general retail and leisure use). The application seeks to carry these forward.

105 In terms of the policy position, the draft London Plan makes it clear in Policy T6(I) that redevelopment of sites should involve compliance with current policy, rather than reprovision of existing car parking. In respect of parking policies within the draft London Plan, it is worth noting that the Inspectors' report acknowledged the "clear and compelling evidence" to justify the car parking standards, which are a strategic matter.

106 The applicant notes, however, that parking for the O2 Arena is necessary through a legal agreement with AEG, the operators of arena. The applicant should provide details of this agreement and contextualise the level of parking proposed and whether any discussions about reducing this have been held. It is understood that the 2015 Masterplan proposed a single MSCP, whilst the 2019 Masterplan proposes to split this into two buildings, which would enable one to be redeveloped in the future should demand for parking drop. The applicant has not provided any information about how this demand will be measured. Whilst GLA officers understand that specific circumstances may exist to justify the car parking here, there is also a strong policy position against large scale car parks and therefore the applicant must provide robust justification for this before it is considered acceptable..

## Public transport

### *Strategic assessment*

107 The public transport assessment methodology is unclear within the Transport Assessment and, therefore, its conclusions cannot be verified. Further work will be necessary to demonstrate an accurate assessment and therefore determine what form and level of mitigation is required. Such mitigation is likely to involve, as a minimum, bus service contributions commensurate with those negotiated for the 2015 consented masterplan.

### *Bus station*

108 The masterplan involves the relocation of the bus station to the southwest of the existing interchange. Significant pre-application discussions have taken place with the applicant's consultant to develop a design which meets capacity requirements in a way that also safely accommodates the high level of pedestrian movements anticipated. Further detail on the parameters that are to be approved within this application should be provided through discussions with TfL. At present, there is concern about the management of event traffic and its impact on bus journey times and reliability when accessing and leaving the bus station. Further work is needed on bus priority proposals and traffic management in order to mitigate this impact.

### *Jubilee Line station*

109 Alongside the relocation of the bus station and the proposed development above the Jubilee Line station, a new surface level entrance to the Jubilee Line is proposed. No details are presented of this proposal and these must be provided to enable an assessment within the present application.

### *Riverbus piers and services*

110 The site has good access to the existing North Greenwich Pier on the east side of the north end of the peninsula. The TA refers to proposals for a new Greenwich Peninsula Pier on the west side. The applicant should confirm the rationale for the relocation of this Pier. Provision of this pier was secured through the 2015 consented Masterplan, and a similar provision should be included in the current application alongside suitable arrangements for pedestrian and cycle access to it in accordance with London Plan Policy 7.24 and draft London Plan Policy SI15 and SI16.

## Car, motorcycle, van and lorry traffic

111 Given the significantly lower levels of parking proposed in the current application compared to the 2015 consent, no strategic modelling was deemed necessary; however, certain improvements to "gateway junctions" were secured through the 2015 consent and these must be included within the current application.

112 Detailed junction modelling is provided for the roads immediately surrounding the proposed relocated bus station; however, this modelling does not follow TfL's Model Audit Procedures and further discussion is required.

## Silvertown tunnel

113 The proposals appear to respect the Development Consent Order granted to TfL for the proposed Silvertown tunnel, including realigning Edmund Halley Way to increase the developable land while avoiding conflict between the tunnel and building foundations which is supported.

### Asset protection

114 There are a number of transport assets in the area, including the Jubilee Line tunnels and station, the Blackwall Tunnel and various pieces of bus infrastructure. It will be necessary to secure protection of these assets through appropriate conditions, obligations or other agreements.

### Travel plan, servicing proposals and construction management plans

115 Draft travel plans have been submitted for both outline and detailed elements. These are largely acceptable subject to minor revision and coordination with travel plans and event management plans for existing uses on the peninsula.

116 Limited details of servicing arrangements are provided for the outline element. The TA relies on trip generation from a number of surveys undertaken between 2006 and 2011, but there has been a considerable increase in servicing activity since then and should be revised. For the detailed element, only two on-street loading bays are proposed, with no assessment of the demand for their use. These bays are some distance from certain building cores. Further assessment and design is necessary to demonstrate acceptable servicing provision.

117 A draft Construction Management Plan which also covers construction logistics has been supplied for the detailed element only. High level proposals should be submitted for the outline element and a condition, requiring approval of detailed arrangements prior to the relevant works commencing, should be secured.

## **Local planning authority's position**

118 Officers from the Council are considering the application and have not identified a date to take it to planning committee.

## **Legal considerations**

119 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. 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.

## **Conclusion**

120 London Plan and draft London Plan policies on opportunity areas, employment land, cultural uses, retail, housing, affordable housing, design, transport, energy and access are relevant to this application. The proposals do not currently comply with the London Plan and draft London Plan. The following changes, however, might lead to the application becoming compliant:

- **Principle of development:** The principle of the mixed-use redevelopment of the site, partially revising the 2004 Masterplan and subsequent 2015 Masterplan, is supported.

- **Housing:** The proposed scheme would provide an addition 1,757 units across the Masterplan area when compared to the previous consents, which is strongly supported. It is also proposed to provide Large Scale Purpose Built Shared Living and Purpose Built Student Accommodation; however, no details of these products or their affordable housing offers have been provided. If these products are proposed, they must be specified, detail provided and be explicitly secured in the planning permission and Section 106.
- **Affordable Housing:** The scheme would provide 2,648 affordable units, equivalent to 44% by hab. room, comprising 57% London Affordable Rent and 43% Intermediate homes. The detailed phase would provide 56% affordable housing (by hab. room) and the outline phase would provide 44%. When considering the committed to or delivered homes under the previous Masterplans, the scheme would provide a peninsula-wide affordable housing offer of 30% by hab. room. Whilst the proposals improve the overall peninsula-wide affordable housing offer, the threshold for the Fast Track route is 50% as it is publicly owned land. The viability assessment submitted with the application is not sufficient to enable an assessment of the scheme's viability and GLA officers will engage with the applicant on this as a priority.
- **Urban design:** Further information is required on the following: the proposed layout; height, massing and scale; architectural approach; open space; and urban greening.
- **Energy:** The applicant has followed the energy hierarchy, which is supported; however, further information is required before the proposals can be considered fully acceptable in line with London Plan Policy 5.9 and draft London Plan Policy S12. In terms of the 'be lean' element of the hierarchy, the applicant should re-run the overheating calculations. For 'be clean', the applicant has identified that the Pinnacle Power district heating network is within the vicinity and is proposing to connect to this network, which is supported but further details are required.
- **Transport:** The proposed residential car parking exceeds London Plan and draft London Plan standards and must be reconsidered. The parking for the O2 Arena significantly exceeds draft London Plan and London Plan standards and robust justification for this is required. Further detail is also required on cycle parking, cycle and walking routes, public transport accessibility, the proposed bus station and new Jubilee line entrance as well as traffic movements.

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