

Greenwich Peninsula Masterplan 2015

in the Royal Borough of Greenwich

planning application no. 15/0716/O

Strategic planning application stage II 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

Outline planning permission with all matters reserved for the demolition of buildings and mixed use redevelopment including buildings up to a maximum of 133.5 metres AOD and comprising Class C3 (dwellings) use up to 12,678 residential dwellings (or up to 1,171,909 sq.m.) and up to 220 serviced apartments (or up to 20,306 sq.m); Class A1-A5 use (food and non-food retail, restaurants, bars and cafes) up to 23,475sq.m; Class B1(a)(b)(c) (business) up to 59,744 sq.m.; Class C1 (hotel) up to 35,999 sq.m. for up to 500 rooms; Class D1 (education facilities) up to 37,900 sq.m.; Class D1 (health care facilities) up to 1,462 sq.m.; Class D1/D2 (visitor attraction) up to 19,526 sq.m.; sui generis use for film and media studios up to 38,693 sq.m.; residential and non-residential car parking as well as a minimum of 2,000 AEG parking spaces (for the O2); cycle parking; associated community facilities; public realm and open space; hard and soft landscaping; a new transport hub and associated facilities; works to the river wall; a ferry jetty terminal; a 5 km running track traversing the entire site (P5K running track); highway and transport works, including amendments to the Thames Footpath and Cyclepath; and, associated ancillary works.

The applicant

The applicant is **Knight Dragon** and the architect is **Allies and Morrison**.

Strategic issues

The concerns raised during the consultation stages regarding **employment opportunities, retail, safeguarded wharves, affordable housing, residential quality and amenity, urban design, inclusive design, air quality, waste management, sustainable development and transport** have been satisfactorily addressed through the provision of appropriate planning conditions, obligations secured by section 106 agreement, or through the submission of further information and the proposals are now supported in strategic planning policy terms.

The Council's decision

In this instance Greenwich Council has resolved to grant permission.

Recommendation

That Greenwich Council be advised that the Mayor is content for it to determine the case itself, subject to Transport for London being a party to the section 106 agreement and any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 25 March 2015 the Mayor of London received documents from Greenwich Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under categories 1A, 1B, 1C and 2C of the Schedule to the Order 2008:

- 1A – *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B(c) – *Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside of Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C – *“Development which comprises or includes the erection of a building more than 30 metres high outside the City of London.”*
- 2C – *“Development to provide a bus or coach station and a passenger pier on the River Thames.”*

2 On 30 April 2015, the Mayor considered planning report D&P/0519q/01 and subsequently advised Greenwich Council that while the principle of development was generally supported in accordance with the strategic aims of the Opportunity Area, as set out in paragraph 150 of the above-mentioned report, there were some outstanding issues that needed to be resolved, and the possible remedies set out in that paragraph could address those concerns.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 8 September 2015, Greenwich Council decided that it was minded to grant planning permission for the revised application, and on 5 November 2015 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Greenwich Council under Article 6 to refuse the application or issue a direction to the Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. As agreed with the Council, the Mayor has until 19 November 2015 to notify it of his decision and to issue any direction.

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

5 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

6 At the consultation stage Greenwich Council was advised that while the principle of the development was generally supported in accordance with the strategic aims of the Opportunity Area, as set out in paragraph 150 of the above-mentioned report, there were some outstanding issues that need to be resolved and these are set out below:

- **Principle of development:** Given the Peninsula's Opportunity Area status within the London Plan, the principle of the large scale mixed-use redevelopment of Greenwich Peninsula that would deliver a significant number of homes and jobs is supported. Furthermore, given the minimum housing target of 13,500 set out within the Opportunity Area guidance in the London Plan and the Peninsula's strategic role as a major contributor towards meeting London's need for additional housing, the proposed residential intensification of the site is supported, subject to the outline application successfully securing the highest quality of urban and residential design, generous open space provision and an increase in the quantum of affordable housing.
- **Loss of employment floorspace:** The principle of the proposed reduction in office floorspace is considered acceptable as it has been demonstrated that this will not have a detrimental impact on current forecasts for the demand of office floor space in East London or the capital as a whole. Furthermore, the masterplan adopts an alternative employment strategy that builds upon the Peninsula's established leisure, retail and digital economies and introduces a new film studio and visitor attraction at the centre of the site and has the potential to directly and indirectly deliver approximately 12,132 fulltime jobs. This is welcomed and is a positive contribution when considered against the strategic aspirations of the Opportunity Area to deliver a minimum of 7,000 jobs and the Councils overall target of 21,000 jobs identified in the core strategy.
- **Film studio:** While the provision of a film studio is strongly supported, further information is required in order to ensure this will be a sustainable facility. The applicant is strongly advised to engage with London's strategic film agency, Film London for further specialist advice.
- **Retail impact on Town Centres:** The London Plan identifies that North Greenwich could be re-classified as a District Centre over the plan period and this is reflected in the Council's Core Strategy. In agreement with the Council, the applicant has carried out a proportionate retail impact assessment. This demonstrates that while the cumulative impact of the proposed and already committed retail development would draw some trade from nearby town centres, this would be adequately offset by the projected growth in population and associated expenditure in these areas as to not impact on their overall vitality and viability and that there would be sufficient expenditure capacity as to not jeopardise existing or planned investments. However, given that the potential quantum of retail floorspace to be delivered is towards the upper limit for district centres and that the outline permission for the O2 Arena provides additional net surplus retail capacity, significant strategic concerns would be raised if this limit were to be breached in the future. The Council should satisfy itself of the robustness of this study and further discussion around the phasing of the retail development is required.
- **Safeguarded Wharves:** The Council should secure a condition requiring that all Reserved Matters applications for developments adjacent to, or within the line-of-sight of the safeguarded wharves should demonstrate how they will successfully mitigate against any associated environmental impacts, so as to not prejudice the their future operation in accordance with London Plan Policy 7.26.
- **Housing:** The revised proposals seek to deliver 12,678 residential units which is a significant contribution towards the minimum housing target of 13,500 set out within the Opportunity Area guidance in the London Plan and is welcomed subject to the masterplan securing the other necessary mitigation measures outlined. With regards to unit mix the applicant should ensure each neighbourhood zone will promote a genuine choice of all unit types in accordance with the aspirations of London Plan Policy 3.8.

- **Affordable housing:** Discussions are still ongoing with regards to affordable housing and at present an offer has not been presented. However, the GLA are of the expectation that there will be an increased provision in the quantity of affordable housing over the existing 2004 masterplan consent and further negotiation and discussion with the applicant and the Council is strongly encouraged with regards to this issue. The applicant has committed to providing a financial viability appraisal for review, which is welcomed in accordance with London Plan Policy 3.12.
- **Children's play space:** GLA officers are content that based on the illustrative masterplan proposals modelled in the design and access statement, it has been demonstrated that the outline stage of the scheme can meet and exceed the on-site play provisions required by the SPG and is in general accordance with London Plan Policy. In addition to requirements in the development specification, a play space strategy detailing the minimum requirement and quantum of play space to be provided within the subject neighbourhood zone should also be required to confirm that each neighbourhood can meet the recreational needs of its future population.
- **Residential density:** In the context of the masterplan aspirations, the approved residential densities of schemes elsewhere on the Peninsula and the sites location within an identified Opportunity Area, subject to the issues raised within this report being addressed, particularly those regarding design and transport, the proposed residential densities are generally supported.
- **Urban design:** The applicant's early engagement with the GLA and the collaborative approach to design taken thus far is strongly welcomed and the principle moves regarding the height strategy, open space provision and principles established in the design guidelines are generally supported. The applicant should however address those comments raised in paragraphs 73 to 94 of GLA report D&P/0519q/01.
- **Inclusive design:** The masterplan recognises the requirement to design inclusively and addresses many of the issues relating to the creation of lifetime neighbourhoods. However, the applicant is recommended to secure these principles within the design guidelines for the masterplan to ensure it develops in conformity with London Plan Policy 7.1.
- **Sustainable development:** The carbon reductions have been calculated using benchmarks rather than Part L modelling and therefore it is not possible to carry out an accurate assessment against London Plan policy at this stage. The savings should be revised accordingly, the comments provided addressed and the suggested conditions secured before the savings and compliance with London Plan energy policy can be verified.
- **Flood risk and drainage:** The outline proposals are in accordance with London Plan policy regarding flood risk and drainage.
- **Air quality:** Given the outline nature of the application it is appreciated that many details are not available at this stage. However, the overall development is not air quality neutral and further offsetting and onsite mitigation measures must be secured and implemented within the more detailed design stages.

- **Waste management:** The commitment to develop an onsite waste management plan for the site and to provide suitable waste and recycling storage facilities within the individual housing units is strongly welcomed. The applicant should however, commit to meeting the Mayor's construction waste recycling targets and explore the feasibility and appropriateness of underground vacuum waste and recycling collection systems and the opportunity to provide heat and power and cooling from waste generated from the development, in accordance with the above comments.
- **Transport:** Strategic transport modelling must be completed in order to inform the necessary transport mitigation measures that are likely to be required and secured in order for the development to be acceptable. A principal concern is how the additional homes will impact on the Jubilee Line and a greater reliance on buses to serve the Peninsula. Further detailed discussion with Transport for London is required regarding the issues outlined in paragraphs 111 to 126 of GLA report D&P/0519q/01 and associated Appendix One.

Principle of development

Control parameters

7 The masterplan outline application comprises a set of parameter plans, design guidelines and a development specification for approval. Other documents and reports have been provided for illustrative purposes to support the proposals. The parameter plans define the application boundary, disposition and maximum quantity of land uses, maximum proposed heights, access and circulation, public realm and open space, and buildings/structure to be demolished and those to be retained. The design guidelines guide the detailed design for the future development stages which comprise Zonal Masterplans for each neighbourhood and Reserved Matters applications for each development plot, aimed at embedding high quality design in the emerging development. The development specification defines and describes the component elements of the 2015 masterplan and sets out the specification for each Zonal Masterplan and Reserved Matters application and is to be read in conjunction with the above documents. The content and revision of the above documents is discussed in further detail throughout the remainder of this report.

8 Compliance for all Zonal Masterplans and Reserved Matters applications with the development specification, parameter plans and design guidelines is secured by a series of planning conditions. All Reserved Matters applications must also be in compliance with the Zonal Masterplans. In addition to the above, environmental assessment screening for all Zonal Masterplan and Reserved Matters stages is secured by condition in order to address any potential significant environmental effects and necessary mitigation that are unable to be identified at this outline stage, which is also welcomed.

9 As set out in the following paragraphs, the detail provided by the above suite of documents, in addition to the supporting information, has enabled officers' to make an appropriate assessment of the masterplan proposals. The development framework they provide, in combination with the planning conditions and obligations secured, will ensure the masterplan proposals come forward in line with London Plan policy.

Film studio

10 As set out in the Mayor's initial comments, the provision of a large film studio and visitor attraction at the heart of the site is welcomed in accordance with the strategic aspirations of London Plan 4.6 which supports the enhancement of arts, culture, sport and entertainment provision in the capital and will complement the emerging character of Greenwich Peninsula as a

leisure and entertainment destination. It is noted that the use of the site identified for the film studio is restricted to this use within the section 106 agreement, unless it is not implemented within ten years from the date of the permission. If this was the case, the film studio floorspace shall be used for alternative employment use, subject to approval by the Council.

11 It is also acknowledged that the presence of the film studio provides a significant opportunity to support the growth of digital enterprises on the Peninsula through the generation of related TV and film post-production work. The section 106 agreement requires the developer to participate with the Greenwich Local Labour and Business Scheme (GLLaB) to promote the use of local employees, contractors and sub-contractors within the Royal Borough to the occupiers of the commercial floorspace. This is welcomed and the GLLaB should use this opportunity to formalise the link between the film studio and local digital enterprise. It is also noted that the section 106 agreement makes provision to secure 10% of the commercial floorspace as affordable work space made available on flexible leases to local businesses. This is also strongly supported as this will continue to encourage the location of start-up businesses on the Peninsula.

12 As requested the applicant has also provided a breakdown of the studio floorspace in addition to confirmation with its engagement with the British Film Commission and Film London; which offers its full support for a new studio. This is welcomed.

Retail impact

13 The retail impact assessment was accepted in principle at the consultation stage and the Council has raised no issues with the Retail Statement in its planning committee report and considers the proposed retail offer to be in accordance with the Core Strategy aspirations for the area. Notwithstanding this, it is also important to note that the level of proposed retail floorspace is significantly less than the quantum considered acceptable for the 2004 masterplan consent and therefore the retail impact of the revised masterplan on nearby town centres should be reduced.

14 As previously acknowledged, due to the outline nature of the application the retail mix provided for the masterplan in the statement is indicative at this stage. However, officers note that the full details of the retail units, including their use class, are secured by planning condition and are subject to approval by the Council prior to the occupation of the relevant part of the masterplan. This is welcomed and will help ensure that a suitable mix of sustainable retail uses is provided on the Peninsula. Notwithstanding the above, while the proposed retail facilities are primarily aimed at the needs of new local residents and workers and to complement the existing leisure-led facilities within the O2 Entertainment District, as previously expressed, GLA officers strongly encourage continued dialogue between the applicant and AEG to ensure both developments progress in a complementary way that secures a competitive, viable and successful future for the regeneration of the Peninsula.

15 The applicant has provided further information with regards to the projected population growth and completion timescales for the retail hub which is welcomed. While it is accepted that the growth in population and expenditure on the Peninsula will help offset the projected retail impact in nearby town centres, the Council should have special regard to the timing of the retail and residential delivery when approving the detailed phasing strategy in order to ensure that any impact on other centres is minimised in accordance with London Plan policies 4.7 and 4.8.

Safeguarded wharves

16 The outline application is supported by an environmental statement which sets out that the detailed design of any residential building adjacent to the wharves, or any that will have line-of-sight of them, will need to provide appropriate mitigation against the environmental impacts associated with the wharf operations. The design guidelines reflect this requirement and set out that any future residential development in Meridian Quays (South) closest to the wharves will adopt a mitigation strategy to minimise potential conflicts of use so as to not prejudice the operation of the wharves. It is noted that since the consultation stage, the design specification has been revised to require that Zonal Masterplans A and E provide an initial noise assessment to inform the strategies. This is welcomed.

17 The applicant has continued to engage with the Port of London Authority (PLA) and the Council since the original consultation stage, and it is noted that suitably worded conditions to address the requirements for further detailed assessment and mitigation at the more detailed design stages have been agreed in consultation with the PLA and included in the draft decision notice. The relevant conditions require all Reserved Matters applications for plots within Development Zones A and E to include an assessment of potential noise impacts from wharf activities associated with Victoria Deep Water Terminal, Bay Wharf and Tunnel Wharf on nearby residential development; the scope of which shall be submitted to and approved by the Council and PLA.

18 Furthermore, it is required by condition that the Reserved Matters applications adjacent to the safeguarded wharves will be submitted with a detailed mitigation strategy based on a set of maximum noise criteria to be achieved within the residential development, that will protect the amenities of any proposed residential properties and external amenity areas, and the operational requirements of the existing uses at the wharves.

19 This tiered approach to assessment and mitigation has been established on other riverside development sites in close proximity to safeguarded wharves and will provide a robust approach to ensuring that the amenities of future residents in neighbouring properties are safeguarded, in addition to the strategic operations of the wharves. Overall this strategy in addition to the requirements set out in the design guidelines is welcomed and helps allay the concerns raised at the consultation stage.

Housing

20 The revised proposals seek to deliver 12,898 residential units (including 220 serviced apartments). Taking into account a further 2,822 units that either currently exist, are under construction or are to be implemented shortly, this would bring the total potential housing delivery on the Peninsula up to 15,720 units. The new homes would be delivered within the five neighbourhood zones, each with its own character, decreasing in density and scale as development progresses southwards along the Peninsula. As previously set out, the increase in housing capacity is supported in accordance with the aspirations of the Opportunity Area and London Plan Policy 3.3.

Affordable housing

21 An affordable housing offer had not been presented at the original consultation stage, however, the applicant had indicated that it would seek to maintain the quantum of affordable housing units secured as part of the existing masterplan consent. The approved section 106 agreement for the existing masterplan sets an affordable housing target of 38% across the wider Peninsula site, which equates to approximately 3,800 units as a proportion of the 10,010 units.

When considering this number of units as a percentage of the total potential housing delivery this would represent approximately 24% of the overall housing delivery.

22 The Mayor's initial representations set out that given the residential uplift proposed over the existing consent, an increased provision in the quantity of affordable housing over the existing 2004 masterplan consent would be expected, and further negotiation and discussion with the applicant and the Council was strongly encouraged.

23 The applicant is committed to delivering a minimum of 2,928 affordable units within the 2015 masterplan area, which equates to 22.7% of the 12,898 units proposed. This is a minimum provision and is secured within the draft section 106 agreement. This will be in addition to the 2,822 homes that either currently exist, are under construction or are to be implemented shortly under the previous consent, of which 1,002 are affordable. Therefore, when considered across the total potential housing delivery of 15,720 units across the wider Peninsula, a minimum of 3,930 units will be affordable, which equates to 25% of the total delivery. This will marginally exceed the quantum of affordable housing secured under the existing masterplan consent which was dependent on affordable housing grant money, which is no longer available for individual development schemes. The Council has set out that if the original masterplan consent was based on a no grant scenario, the level of affordable housing would have fallen to approximately 20% (2,002 units). The currently proposed offer is based on no affordable housing grant.

24 In addition to the minimum level of affordable housing set out above, an affordable housing review mechanism has been agreed to allow financial reappraisal at the reserved Matters stage. The mechanism requires that an updated version of the original financial appraisal, taking into account updated costs and values at the date of the submission of the Reserved Matters application to be submitted to the Council with each application for review and approval. If it is agreed by the Council that the appraisal demonstrates a surplus, further affordable housing will be sought on site or as a commuted sum paid to the Council to deliver affordable housing. The number of additional affordable housing units that could be delivered by this mechanism will be capped at a maximum of 1,572.

25 The affordable housing units will be delivered in all five neighbourhoods at a local policy compliant tenure mix of 70:30 (social rented:intermediate). The social rented element will be delivered at target rents as secured in the draft section 106 agreement. The Council has set out evidence that this better tenure split meets local need in its Development Management Policies Development Plan Document and this was considered acceptable by the Mayor in his response to the statutory consultation for this document (ref:PDU/LDF32/LDD01/01). Therefore, while not compliant with London Plan policy, this is accepted in this instance.

26 The section 106 agreement requires that every plot shall include affordable housing with the exception of plots 1.01, 1.02, 1.03, 2.01, 2.02 and 2.03 in the Meridian Quays neighbourhood. This arrangement was previously agreed in 2013 as part of the 11 Plot Agreement, in order to accelerate the delivery of 646 affordable housing units across seven of the plots subject to the agreement. As the schemes delivering the affordable housing have since been consented and are currently being delivered, the Council accepts, on balance, the proposal to retain the principle that no affordable housing shall be delivered on the above plots. Notwithstanding this, the Council has clearly stated, that in making its decision, this agreement is an exceptional circumstance and should not be taken as a precedent for large quarters of other neighbourhoods in the masterplan or elsewhere in the borough to not contain any affordable housing, and that such proposals would not be acceptable. Notwithstanding the above, the applicant has set a minimum target of delivering 850 affordable units within the Meridian Quays neighbourhood through the other plots not subject to the original agreement.

27 The applicant has agreed to set minimum percentages of affordable housing to be delivered in each residential neighbourhood and the section 106 agreement secures an obligation for the applicant to provide an affordable housing distribution table. This table will set out the guaranteed minimum number of units, as well as indicative totals to be provided in each neighbourhood and will be reviewed and updated as development progresses at the Zonal Masterplan and Reserved Matters stages with any changes subject to approval by the Council. The section 106 agreement makes provision for the Council to prevent any future occupation of residential units should it not be content with any revisions proposed to the distribution table. This is welcomed and will help ensure that affordable housing is delivered at a steady rate throughout the development of the Peninsula and will help achieve mixed and balanced communities in accordance with London Plan Policy 3.9. The proposed indicative affordable housing distribution provided within the draft section 106 agreement is summarised below:

Neighbourhood	Total homes	Affordable homes	% Affordable
Brickfields North	1,152	270	23%
Brickfields South	1,608	447	28%
Lower Riverside	2,607	607	23%
Meridian Quays	5,851	1,203	21%
Peninsula Central	1,680	401	24%
Total	12,898	2,928	22.7%

28 In accordance with London Plan Policy 3.12, the applicant has submitted a financial viability appraisal to the Council, for independent assessment to support the affordable housing offer. The Council has used an independent assessor to review the appraisal in detail and has shared the results with the GLA. The assessor agreed with the base values and costs contained within the report and supports them at today's values and costs. The assessment also acknowledges the substantive up-front infrastructure investment, such as a new transport interchange and other mitigation, required to serve the future population of the Peninsula, and that this cost will defer a positive return for the applicant for some years, thus increasing development risk. On detailed examination of the financial evidence submitted by the applicant, the assessor accepts that the revised proposals will remain in a financial deficit in excess of £1 billion in the medium term, and that the main challenge is for the applicant to deliver the 'place making' on the Peninsula necessary to generate a new market in order to generate higher values and a profit.

29 As set out above, despite this high risk strategy, the applicant has committed to deliver a guaranteed 22.7% affordable housing element in the revised proposals, or 25% when considering the total housing delivery on the Peninsula, and that this is delivered on a no grant basis. Given the risk involved, the applicant has also been asked to further consider the possibility to which the base affordable housing offer can be increased via the agreed review mechanism. The applicant's analysis sets out that should sales prices increase to those achieved at the Woolwich Arsenal development, the masterplan development may be in an economically viable position to provide additional affordable housing halfway through the proposed development cycle of twenty years. This is based on the development achieving a 5% net growth which would clear the current deficit within the proposed masterplan scheme and achieve an internal rate of return (IRR) of 19.77% at year ten. Should net growth exceed those achieved at Woolwich Arsenal, it is therefore reasonable to expect that additional affordable housing delivery could be achieved within the first ten year development period, and this would be captured through the review mechanism.

30 It is understood that the above has been debated at length with applicant and the independent assessor believes that there is a "strong likelihood" that the above outcome will be achieved and that without further grant or financial support, the masterplan proposals will deliver

additional affordable housing above the guaranteed 25%. On this basis the independent assessment and the Council support the proposed offer. This represents a significant quantum of affordable housing that at the minimum level would deliver and marginally exceed the affordable housing aspirations of the existing masterplan that were reliant on grant funding.

31 Furthermore, the agreed review mechanism secures the potential for a further 1,572 units should the development achieve similar levels of net growth in value to other developments in the borough. While this is considered optimistic, should the maximum additional level of affordable housing be delivered this could potential deliver 35% affordable housing across the masterplan in line with local planning policy.

32 In light of the conclusions of the independent review and the mechanisms secured within the section 106 agreement which will secure uplift in scheme viability for additional affordable housing and the submission of ongoing updated tables to ensure the appropriate disposition of affordable housing across the masterplan, the proposed affordable housing offer is accepted.

Housing choice

33 As set out at the consultation stage, as the Zonal Masterplans are progressed, the applicant and the Council should ensure each neighbourhood zone will promote a genuine choice of all unit types in accordance with the aspirations of London Plan Policy 3.8. Furthermore, with regards to the overall housing mix, the development would be expected to have regard to the strategic priority afforded to the provision of affordable family housing and provide a range of unit sizes to meet both local and strategic housing needs, established in consultation with the Council's housing officers.

Residential quality

34 The proposed design guidelines were welcomed at the consultation stage and their content broadly supported. The applicant was requested to make more specific references to future development securing the good practice standards in the Mayor's Housing SPG such as minimum unit sizes, minimum private amenity space provision, floor to ceiling heights, unit aspect, and outlook. The residential design section of guidelines have been updated in response to the stage one comments and now make specific reference to residential design adhering to the quality guidance as set out by the Royal Borough of Greenwich and London Housing SPG, which is welcomed. Specific reference to actual good practice standards/requirements in the Housing SPG have not been made to allow for changes in local and strategic policy that may occur over the twenty year development period. Notwithstanding this, a planning condition has been secured requiring that all residential units shall be designed in accordance with the Housing SPG, or relevant standards, and that all Reserved Matters applications shall include a schedule of compliance with these standards. This is strongly welcomed and will help ensure the highest quality of residential design is secured throughout the detailed design process.

35 A condition has been secured requiring that all Reserved Matters applications shall include a scheme to minimise exposure of future occupants to air pollution and will be required to demonstrate how any required mitigation has been incorporated into the design of the development. This condition is welcomed and will help ensure that any development in close proximity to the Blackwall Tunnel vent shaft, or other pollution sources such as safeguarded wharves, will be appropriately designed so as to achieve a high quality living environment. Further conditions have also been secured requiring the submission of the minimum distance to be observed between any buildings and the Blackwall Tunnel vent shaft for approval by the Council prior to the commencement of the relevant part of Zone A. This will further help safeguard the residential amenity of future occupants and is welcomed.

Children's play space

36 As set out at the consultation stage, GLA officers are content that based on the illustrative masterplan proposals modelled in the design and access statement, it has been demonstrated that the outline stage of the scheme can meet and exceed the on-site play provisions required by the Mayor's Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation SPG.

37 Since the consultation stage, the Zonal Masterplan specification has been amended in the revised Design Specification to include confirmation of the minimum requirement and quantum of play space to be provided within the area, which is welcomed.

38 Furthermore, a series of planning conditions have also been included in the draft decision notice requiring that all Reserved Matters applications shall include details of the children's play areas to meet the standards and requirements of the SPG, and a requirement to provide full details of the play areas and equipment proposed. This is strongly welcomed and will ensure that the recreational needs of the future occupants of the Peninsula will be met.

Social infrastructure

Education facilities

39 As requested the applicant has provided a further breakdown of net school place capacity between the London Borough of Greenwich, Tower Hamlets and Newham. This demonstrates that the overall masterplan provision will reduce the need for children to travel outside of the Peninsula to attend school and will help mitigate the overall residential intensification of the site.

40 Notwithstanding the above, the Council have already begun the planning process for the delivery of the proposed through school in Lower Brickfields and currently intends to open the through school in September 2017 (LPA ref:15/1910/F). The early delivery of this key piece of social infrastructure is welcomed and will help meet the educational needs of the new residential population as it grows on the Peninsula. Furthermore, the applicant is required to pay the agreed contribution to the Council for the schools construction prior to the occupation of 5,750 units.

41 It is important to note that the through school site is located within the HSE consultation zone for the nearby East Greenwich Gasholder Station. GLA officers are currently addressing this issue with the Council through the consultation process for the detailed planning application for the school which has been referred to the Mayor for his initial consideration (GLA ref: D&P/3637a/01). The Council is also consulting with the HSE with regards to appropriate design solutions or grampian planning conditions that will ensure development on this site comes forward in a safe manner. GLA officers are currently awaiting a response from the applicant to those issues raised in the above quoted report. Notwithstanding this, it is acknowledged that a planning condition has been secured that prevents any development that would result in children congregating in open areas within 375 metres of the centre of the gas holder until such time that the hazardous substances consent has been revoked.

42 The draft section 106 agreement secures the delivery of the both schools and contributions towards their construction which is welcomed. With regards to the primary school, in accordance with the draft section 106 agreement, the primary school must be delivered before the occupation of more than 6,000 dwellings.

Urban design

43 The applicant's early engagement with the GLA and the collaborative approach to design adopted throughout the process is strongly welcomed. Overall, it was considered at the initial consultation stage that the supporting design guidelines reflect the strategic urban design aspirations of the London Plan and the level of detail, in most cases, has allowed officers to make an appropriate assessment of the masterplan at this outline stage. The guidelines establish a coherent set of principles that all future Zonal Masterplans and Reserved Matters application will need to comply with and will go some way to ensuring that the on-going regeneration of the Peninsula will deliver the highest quality of urban design and continue to grow as a successful and vibrant place to live and work. Furthermore, the principle moves regarding the height strategy, open space provision and principles established in the design guidelines were generally supported.

44 Notwithstanding the above, the applicant was asked to consider the role smaller scale buildings could play in key locations, such as adjacent park spaces and on the riverside (similar to that of the listed pub and workers cottages in Central Park). In response the applicant has provided an addendum to the illustrative design and access statement to address this point which is welcomed and GLA officers strongly agree with the view that the role of small buildings can provide valuable urban qualities which taller buildings cannot, help reinforce a finer urban grain and provide a diverse townscape. It is noted that the design guidelines have been updated to reflect these principles, particularly in relation to the proposed design district.

45 It is also acknowledged that the height parameters for the masterplan relate to maximum and not minimum heights and that the Zonal Masterplans will provide more detail on the distribution of smaller scale buildings at a neighborhood and block basis. As these plans progress the applicant is strongly encouraged to develop a compositionally diverse townscape in order to develop a unique character for each neighbourhood that is central to delivering a vibrant and interesting place to live.

46 In addition to the above and as requested at the consultation stage, the design guidelines have been amended to include more specific reference to the soft landscaping opportunities provided between buildings and the important role of mature planting in moderating the perceived scale of development, which is strongly welcomed.

47 The applicant has also provided further information on the nature and design of the proposed land bridge. It is proposed that the raised pedestrian walkway will lead from the Transport Interchange Building to the new park in Meridian Quays, providing a critical, safe east-west connection over Millennium Way and the Blackwall Tunnel approach road and will be similar in concept to The Green Bridge in Mile End. The bridge is intended as a landscape element that extends the character of the park up to the interchange building. As set out at the initial consultation stage, the bridge is strongly supported.

48 With regards to the relationship between the film studio and adjacent residential development, officers reiterate the comments previously made that the design of the studio perimeter will be fundamental to the quality of the adjacent residential development and new pedestrian routes through this part of the site. While it is welcomed that this issue is reflected within the design guidelines, officers take this opportunity to emphasise that this must be a key consideration for the Council when assessing the more detailed design stages for plots in this area in order to secure the highest quality residential development and public realm at the heart of the masterplan site.

49 The strategic urban design issues raised at the consultation stage have been satisfactorily addressed through the provision of further information, the requirements secured within the

development specification, design guidelines and via planning obligation/conditions, and as a result the design of the overall masterplan is supported in its outline form.

Inclusive design

50 The applicant presented the revised masterplan proposals to the GLA Strategic Access Panel in April 2015 and this engagement is strongly welcomed and the comments provided have been used to inform further discussion and revisions since the consultation stage.

51 The development specification requires that individual access statements must be developed and brought forward as part of future Zonal Masterplans and Reserved Matters applications which will ensure the masterplan develops in conformity with London Plan Policy 7.1. In response to the comments made at the initial consultation stage, the design guidelines have been revised to include an inclusive design framework to inform all future stages of development. The framework sets out a broad strategy to deliver both the physical and social principles of Lifetime Neighbourhoods and this is strongly supported, as is the specific reference to development achieving or exceeding relevant local and strategic wheelchair housing standards. Compliance with this framework will be enforced through the requirements of the development specification and associated planning condition, which is welcomed and will help achieve the masterplan aspirations of creating an exemplary new urban district for all members of the community.

Sustainable development

52 The applicant has continued to engage with GLA officers and the Council regarding the strategic energy issues raised at the consultation stage and agreement has been reached on appropriate planning conditions that address those concerns previously raised, which is welcomed.

53 It is acknowledged that Part L modelling is not always appropriate for outline applications due to the level of available detail, ie. no internal layouts of facade mark ups. A number of assumptions have therefore been made in the energy strategy regarding the savings from energy efficiency and passive design, and connection to the Greenwich Peninsula Low Carbon Energy Centre (LCEC). While the applicant has provided further information to evidence these assumptions, a number of appropriate planning conditions have been agreed in order to secure future compliance with London Plan energy policy at the detailed design stages.

54 The agreed conditions secure the requirement that all Reserved Matters applications include an energy statement using detailed Part L compliant modelling rather than benchmarks, detailing how the development proposals, in accordance with the energy hierarchy, will achieve a 35% reduction over Part L 2013 as required by London Plan Policy 5.2. This applies to all domestic and non-domestic buildings and is strongly supported and helps address those issues previously raised regarding energy modelling.

55 With regards to LCEC, full details demonstrating how each approved scheme connects to the district heat network is required to be submitted to the Council for approval within one month of commencement on above ground works. This information will also include evidence demonstrating compliance with the CIBSE heat networks Code of Practice and how heat losses from secondary networks have been minimised. This is welcomed and helps address those concerns raised at the consultation stage.

56 A planning condition has also been secured requiring that evidence demonstrating minimum overheating risk in residential and non-residential areas in the relevant part of the

development has also been secured. Furthermore, an appraisal of the feasibility of onsite renewable technologies is required with each Reserved Matters application is also conditioned.

57 In light of the above conditions which have been agreed with the Council and applicant, GLA officers are content that the necessary framework is now secured to ensure compliance with London Plan energy policy as the masterplan progresses to more detailed design stages.

Waste management

58 The submission of a waste disposal strategy addressing the management and disposal of waste derived from the use and occupation of the development for approval by the Council prior to implementation of each Reserved Matters area is secured by planning obligation. In addition, full details of the refuse storage, recycling facilities and refuse collection points, in addition to the submission of a refuse recycling strategy for all uses are required by planning condition prior to commencement of the relevant parts of the development. This is welcomed in accordance with the strategic aspirations of London Plan policies 5.16 and 5.17.

59 As set out above in paragraph 34, compliance with the Mayors Housing SPG is also secured by planning condition at the Reserved Matters stage and this includes specific details on waste and recycling within the home. This is also welcomed. The above condition will help encourage high recycling performance from residential and non-residential activities and overall the outline proposals are in general accordance with London Plan waste policies.

Air quality

60 As set out at the consultation stage, given that the masterplan application is at the outline stage, many of the issues previously raised are more relevant to the detailed design stages and should be considered by the Council in their approval of the Zonal Masterplans and Reserved Matters applications. Notwithstanding this, it will be critical that offsetting and onsite mitigation measures are secured and implemented within the more detailed design stages to ensure the revised masterplan would comply with relevant European, national and local air quality policy during construction and operation.

61 Notwithstanding the above, planning conditions securing air quality monitoring, assessment and mitigation at the Reserved Matters stages have been included in the draft decision notice to safeguard the amenities of future residents, neighbouring properties and the area generally. In addition, it is noted that the section 106 agreement also secures a new air quality monitoring station within the masterplan site and the continuation of the Low Emission Zone, including a requirement to submit a review of its operation for periodic appraisal by the Council.

62 The Council should have regard to London Plan Policy 7.14 when approving the Zonal Masterplans and Reserved Matters applications.

Transport

Strategic modelling outcomes

63 At the time of the initial consultation, the applicant was in the process of carrying out a strategic modelling assessment as required by London Plan Policy 6.3. The modelling covered the morning and evening peak periods for the base (current) year and completion year (2031). The development assumptions including population, employment, all land uses and the lower car parking ratio were assessed.

64 The Council and applicant were advised that the strategic outputs from the modelling indicated that the development can be accommodated on the public transport network. However, the Jubilee Line is under increasing pressure from this and other development which is being brought forward in East London. The increased number of residential units with a decrease in the car parking ratio from 0.7 to 0.25 is supported but results in a higher dependence on the public transport network by a greater number of residents than was anticipated in the 2004 Masterplan.

Resilience of the transport network and mitigation

65 In response to the strategic modelling outputs it was necessary to consider a range of alternative to the Jubilee Line to ensure that future public transport provision could provide a greater degree of resilience and choice for future residents of the Peninsula. This has focussed on the delivery of a new, larger capacity bus station and is necessary to accommodate future additional bus services. An accompanying financial contribution of £12 million has also been secured via a planning obligation to support a package of future bus service enhancements delivered through Sponsored Route Agreements between the Council and Transport for London (TfL). This will allow bus service changes to support the build out of the Peninsula.

66 In addition to the above a new interchange is proposed and will be required to include the necessary provision for taxi's, private hire vehicles, pick up and drop off, disabled parking and London Underground operational parking. Cycle parking will also be required.

67 The Emirates Airline will continue to offer an alternative travel option and the proposals include the delivery of a future pier on the western side of the Peninsula, which is consistent with the Mayor's River Action Plan which has North West Greenwich as a potential future pier. The section 106 agreement requires the pier to be developed in agreement with TfL and the future transfer of the pier to TfL for nil consideration.

68 A series of planning conditions have been secured requiring the applicant to submit details of the development phasing, wayfinding, construction logistic plans, travel planning, service and delivery plans, cycling measures, electric vehicle parking and further safeguarding conditions relating to TfL infrastructure protection have also been secured.

Section 106 agreement and other agreements

69 Given the scale and complexity of the transport infrastructure delivery to support the development and TfL's land interests on the Peninsula, TfL is of the view that it is critical to be included as a party to the agreement. This ensures the regulatory control function exercised through the planning process would be distinct from TfL's property and other infrastructure protection interests. Through the course of discussion it has been agreed that TfL will be a party to the agreement and the drafting of the section 106 has been amended to reflect this. This is strongly supported.

70 Alongside the section 106 agreement there will also be separate "development agreements" that the applicant will have to enter into with TfL to deliver the new bus station and interchange at North Greenwich. TfL is able to exercise its infrastructure protection role through "build over agreements" with the developer to ensure its existing infrastructure; particularly the Blackwall Tunnel and Jubilee Line, can be protected through the development process. There will also be a separate Land and Works agreement between TfL and the applicant in relation to the Silvertown Link. Other property agreements for the interchange over site development will be required as necessary. These agreements do not exist at present and

therefore TfL as a signatory to the section 106 agreement ensures the planning process can suitably protect TfL's interests and provides TfL with the ability to enforce the agreement directly or in conjunction with the Royal Borough of Greenwich as the Local Planning Authority.

Conclusion

71 TfL is satisfied that the proposals, together with the accompanying conditions and section 106 agreement which TfL is now a party to, provides a range of obligations on the developer to mitigate the impact of the development on the transport network; principally through the new bus station, interchange and contributions towards the bus network. On this basis the proposals are considered to be consistent with the transport policies as set out in the London Plan. As the various development plots come forward they will be required to pay the Mayoral Community Infrastructure Levy, administered by the Royal Borough of Greenwich and monies transferred to TfL.

Response to consultation

72 The application has been subject to two rounds of consultation in March and July 2015 to take account of revisions to the scheme made during the planning process. The Council publicised the application by issuing letters to approximately 7,900 to surrounding occupiers in the vicinity of the development, including properties Tower Hamlets and Newham, in addition to issuing site and press notices.

73 In response to the consultations, the Council received 42 letters of objection and two general comments. The representations received by the Council with regards to the application have been set out in detail in the Council's planning committee report and addendum report dated 8 September 2015 and full copies of the individual representations have been made available to the Mayor as part of the statutory referral process. For the convenience of the Mayor the key issues raised by the consultations are outlined below:

Objections from local residents

- **Impact on public transport infrastructure:** Many of the objections raised concerns with regards to the overall impact of the development on the local road transport network, particularly the combined impact when including traffic to be generated from already consented developments in East Greenwich. Overall, the objections argued that the road and transport network cannot cope with the scale of development proposed. Also, concerns were raised with the potential impact on the already busy Jubilee Line at North Greenwich station and its ability for capacity improvements. Politicians and planners have been called to push for a sustainable alternative connection to Canary Wharf to mitigate the strain on North Greenwich station and a cycle and pedestrian tunnel or bridge was suggested. In addition, objectors requested that the application be deferred until comprehensive transport modelling; including all development in East Greenwich is undertaken. The proposed new bus station was welcomed but not considered adequate for future expansion. It was stated that a proposed DLR extension as identified in the Peninsula West Masterplan SPD is essential and must connect with Charlton Riverside. Further objections, stated that the Greenwich Waterfront Transit project must not be resurrected.
- **Walking and cycling:** Representations set out that walking and cycling must be made easy and attractive across the entire masterplan site and that all routes and parking should meet TfL Cycle Design Standards. Current cycle routes are poor and must be upgraded. Objections were raised to a new pedestrian/cycle link to the Isle of Dogs not being secured.

Further comments suggested that all river fronts should be vehicle free and encourage green modes of travel as developers routinely take over the Thames Path.

- **Parking:** The development should be car free.
- **Height:** The tower blocks will have a negative impact on the local skyline, are way in excess of the 2004 Masterplan and will cause overshadowing. Objections were also made to the massing rationale and distribution of tall elements across the site. The taller elements should be clustered in one or two locations in order to create more recognisable landmarks. The proposed massing shows an overbearing form of construction, particularly from Central Park that will be claustrophobic for the residents. Representations also objected to obscured views of the O2 Arena. The overall height of forty plus storeys is too high and it will overshadow the O2 Arena and surrounding area.
- **Impact on the character of the area:** The proposals will not contribute any built heritage worthy of the Royal Borough of Greenwich.
- **Pollution and air quality:** There will be an increase in air pollution which already exceeds national requirements. The Silvertown Tunnel will increase through traffic and pollution. New transport infrastructure should be futuristic and based on clean options, such as cycling and walking. Public transport should be electric/hybrid and all diesel vehicles should be banned on the Peninsula. Objections were made to the construction of a school in a “pollution hotspot” in accordance with Environmental Audit Committee recommendations and that NO₂ levels exceed EU limits were the school is proposed. The Council should produce an environmental impact survey to assess the impact of Silvertown Tunnel on local air quality.
- **Size and scale of development:** Objections were made to the proposed residential uplift and the resultant increase in building heights as it would create a much bulkier addition to the Greenwich skyline. It was not made clear in the consultation that the proposals exceed the expectations in the London Plan or in the Council’s Core Strategy. The proposals when considered with the contribution of the wider Opportunity Area would deliver more 19,000 units which is vastly more than the 14,000 target in the London Plan.
- **Density:** The proposals are well in excess of London Plan guidance and will reproduce the problems of previous high rise developments.
- **Affordable housing:** Objections were made to the level of affordable housing and that a clear commitment to providing 35% affordable housing in line with Council policy should be made. Affordable housing is a vitally important part of the masterplan and it is therefore unacceptable for the development to attempt to seek planning permission and consult with details of affordable housing absent from the application. The viability information should be made fully publicly available and the details of the number, percentage and distribution of affordable housing should be made available for public consultation.
- **Mix of units:** The mix of units is vague and a greater number of family homes is needed.
- **Open space:** The amount of green space provision is disproportionally small compared to the density proposed, as is the increase in the size of Central Park and there is no commitment to quantum of public realm.
- **Social infrastructure:** Object to the local school being run as a faith school; there is a lack of school places; lack of doctors; additional school, doctors and play areas must be in place

for existing residents; more indoor and outdoor community facilities are needed; the play space is too far from residential development to enable social interaction; the quantum of school places and GP surgeries should be a minimum not maximum provision.

- **Phasing:** Objections have been raised to the lack of clarity about phasing which is considered as key to creating sustainable communities during the long development period.
- **Public consultation:** Local consultation has been minimal and not extensive enough for an application of this size, and the application should be deferred to allow longer consultation. The process has been rushed and the consultation letter is not clear.
- **General:** The development falls short of that specified in the London Plan and differs significantly from the original masterplan; local people will not benefit if flats are bought as foreign investments; it should be rejected due to the life changing implications for the surrounding area; the previous masterplan should be revived; not enough mix of uses, there should be more space for small retail facilities, restaurants, retail outlets and other amenities; buildings so far have attracted fast food outlets and litter; the proposals should be considered in conjunction with Enderby Wharf, Lovell's Wharf and Morden Wharf which will crowd the waterfront and the listed Enderby House, which should be protected with all its whaling and cable-making heritage; the Peninsula has an industrial history and the remaining gasometer should be preserved.

74 The objections raised during the public consultation process are addressed in detail within the Council's committee report and do not raise any strategic issues that have not already been considered in the stage one report or this report.

Responses from statutory consultees and other organisations

75 The statutory consultees issued responses to the consultations covering the following issues:

- **London Underground:** Raised no objection to the planning application, subject to the provision of a safeguarding condition relating to any ground or below-ground construction in order to protect London Underground infrastructure. This has been agreed and included in the draft decision notice.
- **Thames Water:** Proposed a number of conditions including, a grampian style condition relating to the provision of a detailed drainage strategy in order to ensure that the waste water infrastructure can accommodate the needs of the application. A condition requiring the submission of impact studies on the existing water supply infrastructure to the Council and Thames Water prior to commencement, to ensure that the existing infrastructure has capacity to cope with additional demand was also requested, in addition to a condition requiring piling method statements. These have all been secured.
- **Environment Agency (EA):** Raised no objection to the principles set out in the outline application and welcomed continued partnership working with the Council and the applicant throughout the more detailed stages. The EA supports the vision to optimise the river Thames waterfront and the commitment to raise the flood defences along Greenwich Peninsula and relevant conditions regarding flood risk management were requested. The provision of a waterfront park was also strongly supported given the ecological potential of the river foreshore, in addition to the green links across the Peninsula. The EA welcomed early discussion in the more detailed design stages to ensure ecological enhancements are maximised and suggested a number of relevant planning conditions regarding biodiversity

and ecological investigation/management. The EA also welcomed the use of an environmental method statement in line with the existing masterplan and requested further conditions regarding water management, groundwater protection and land contamination. Suitable conditions and informatives have been secured to address the above issues.

- **London City Airport:** Raised no aerodrome safeguarding objections but requested conditions requiring that no building exceed the obstacle limitation surface, the submission of construction methodology statements for crainage and scaffolding above the permitted height and for reducing the potential of bird strike.
- **Historic England (HE):** Considered the information and did not express a view on the proposals and that it should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.
- **Historic England, Archaeology:** Raised no objection and approved the relevant chapter of the environmental statement regarding archaeological consideration. As a result a set of standard conditions was requested requiring detailed archaeological evaluation, investigation and mitigation to be secured prior to development of the relevant parts of the site. Suitable conditions have been secured.
- **National Planning Casework Unit:** Acknowledged the receipt of the application and made no further comment.
- **Sport England:** In its statutory response, Sport England raised no objection to the redevelopment of the former Soccerdome site. It did raise a non-statutory objection to the lack of identified sports and recreation facilities in the proposals required to meet the need it will generate and requested that the provision of indoor and outdoor sports facilities be secured by planning obligation. Sport England removed its non-statutory objection on the grounds that the Council's regulation 123 list includes sports and leisure facilities and expressed that the consideration should be given to the sports facilities needs and where the CIL funding should be spent. The Council has confirmed that it will consider appropriate requests for CIL funding from its CIL receipts.
- **Highways England:** Reviewed the information provided in the submitted transport assessment and made no comment on the development as it will not affect the Strategic Road Network (M25).
- **Natural England (NE):** Welcomed the proposals for a system of interconnected green spaces and that the Central Park will be the "green lung" of the Peninsula. NE encourages the incorporation of green infrastructure into the development and strongly encouraged the Council to maximise its provision during the development process. The use of green roofs was encouraged as was the use of bespoke solutions that maximise biodiversity value. Further comments were also provided emphasising the value of access to natural green space, the importance of the maintained access to the Thames Path during construction, protected species and support was given to the proposals for strengthening of the existing ecological qualities of the site. In addition to the general advice provided on the above, NE specifically welcomed the widening of Central Park and improvements to the Riverside Walkway, in addition to recommending the consideration of additional cycle access to the Thames Path. NE set out that it would expect the Council to assess and consider the possible impacts of the proposal on protected species, local wildlife sites and potential biodiversity and landscape enhancements when determining the case. The Council has secured suitable conditions regarding ecological enhancements within the draft decision notice.

- Port of London (PLA):** The PLA has been in continued discussion with the Council and applicant throughout the consultation process. The key concern for the PLA was the juxtaposition of residential development and the safeguarded wharves and its objection to the proposals was mainly based around this key issue. Other concerns were also raised with regards to the extent of the red line boundary, potential site layout, noise, air quality, lighting and transport impact on the existing safeguarded wharves at Victoria Deep Water Terminal and Tunnel Glucose Wharf. Further issues were raised with regards to the location of the proposed new river bus stop, the potential impact on PLA navigational equipment from tall buildings, ecological impact to the River Thames, the proposed phasing in relation to the safeguarded wharves and details of works to the river wall. Conditions were also requested regarding the use of the river during construction, riparian lifesaving equipment and external lighting. As set out within this report and the Council's addendum report to the planning committee, the PLA and the Council have since agreed revisions to the design specification, design guidelines, and secured appropriate noise and air quality conditions to address the issues associated with the juxtaposition of residential development and potentially reactivated wharves. Notwithstanding this key issue, through continued discussion and representations from the PLA further information has been provided, in addition to relevant planning conditions and informatives regarding the location of the river bus stop, works to jetties, hydrodynamic modelling, light pollution, navigational equipment and phasing have been secured to go some way towards addressing the above concerns. The proposed conditions also secure a role for the PLA in approving many of the details for works potentially affecting the river and safeguarded wharves at the future Zonal Masterplan and Reserved Matters stages.
- NHS Greenwich Clinical Commissioning Group (CCG):** CCG made representations on behalf of NHS England, NHS Property Services and Community Health Partnerships. CCG requested clarification on the projected population yield and some concern with regards to the timing of the provision of a new health facility being able to meet growing demand. It is the CCG's preference that a new larger facility of 1,300-500 sq.m. located near to the transport interchange be examined and would welcome the opportunity to work with the Council to define future requirements. Further clarification regarding the health impact assessment was requested, particularly how the proposals will reduce health inequalities. The applicant was encouraged to develop a set of health and wellbeing principles to be established in the Zonal Masterplans and Reserved Matters applications and agreed in accordance with the Council's Health and Wellbeing Strategy. It is noted that the application has been revised to include one larger health facility in Peninsula Central rather than three smaller centres across the masterplan.
- London Fire and Emergency Planning Authority (LFEPA):** Was not satisfied with the proposals due to the level of detail available. It strongly recommended that sprinkler systems be installed. These comments have been passed to the applicant and suitable informatives included in the draft decision notice.
- Health and Safety Executive (HSE):** There are two sites with hazardous substances consent on the Peninsula; Brentagg UK at Tunnel Avenue and the East Greenwich Gasholder Station. The owner of the gasholder, Southern Gas Networks, has written to the HSE advising of the current non-operational status of the gasholder, however, they have not put in writing their intentions for the hazardous substance consent. Therefore, the HSE advice is based on the current hazardous substance consent and is given in relation to the development zones affected by the HSE consultation zoning. In summary, the HSE advises that where development is within the medium to higher risk consultation zones (Zone B Plot 15 and 16, Zone C Parcel 17 Plots 01 & 02 and Parcel 21 Plot 01 and Parcel 22), there are sufficient public safety grounds to refuse permission, but this advice would be

withdrawn if grampian style planning conditions are secured to prevent occupation of the relevant developments until the hazardous substance consent was withdrawn. This is with the exception of the school site on Parcel 18 which falls mostly within the lower risk zone, which given the proposed use, creates sufficient public safety grounds to refuse permission. However, a full application has already been submitted for this site and as a result of HSE pre-application advice, the design has been evolved to incorporate risk reduction measures and a grampian condition has been accepted. In summary, subject to the above conditions, the HSE would not advise against the granting of planning permission for the vast majority of the development. The Council has secured appropriate planning conditions and informatives to address the above concerns. Officer note the Addendum report to the Council's planning committee report provides updated advice from the HSE which sets out that on review of the draft planning conditions provided, it would be able to withdraw its advice regarding development on Parcels 15, 16, 17, 18, 21 and 22.

- **Met Policy – Design Out Crime Officer (DOCO):** Requested that a condition be secured requiring that any development within the masterplan must achieved Secured by Design accreditation or the latest equivalent. This condition has been secured.
- **MBNA Thames Clipper:** Overall supports the redevelopment of the Peninsula. Thames Clippers support the proposals for a new pier on the western side of the Peninsula and its position will be critical to maximise the potential of the service and capture demand from the office and residential development and footfall from the AEG Hotel and O2 Arena. A new pier is also proposed on the eastern site of the Isle of Dogs, but is subject to planning consent, and London River Services and Thames Clipper are both stakeholders. Therefore, the introduction of a new cross river link between the Peninsula and Canary Wharf could be possible and Thames Clipper welcomes the opportunity to explore operating such a service. This could alleviate growing pressure on the Jubilee Line and would meet one of the Mayor's Transport Strategy targets in the delivery of a local river crossing. Thames Clipper believe the CIL funding should be used towards new pier infrastructure and the funding of the cross river service and urge the Council to consider this when allocating CIL funding and assessing enhancements to the local transport network. Thames Clipper would be pleased to scope the potential service and costs for such a project. The Council has stated it will consider appropriate requests for CIL funding from its CIL receipts.

76 The following amenity groups issued responses to the consultations covering the following issues:

- **Greenwich Conservation Group (GCG):** The Group generally welcomed a review of the 2004 Masterplan to reflect changes in planning policy at the national, strategic and local level, as well as land use changes on the Peninsula. However, concerns were raised with a developer-led approach to the review and GCG believe it should be a Council-led approach similar to that taken for the Spray Street Masterplan SPD and Thomas Street Masterplan SPD. Furthermore, the Group are concerned over the outline nature of the application and how this will determine the scale and type of future development. No objections were raised with regards to the changes in land use proposed, but comments were made on the potential for the North Greenwich district to be overly-skewed towards the entertainment offer, questioning the proposals to introduce another 500 bed hotel, in addition to questioning whether the location of the primary school in the Meridian Quays quarter was an appropriate location for educational facilities given the high-levels of public traffic expected in this area. No objections were raised to the provision of a through school, the film and media studio and expansion of the Ravensbourne College, but were surprised to note that no further student accommodation is proposed. Objections were raised to the increase in residential units on the basis that it will put a strain on the amount of publicly-

accessible open space when considered with other developments outside of the masterplan boundary. The Group urged the Council to seek a considerable reduction in numbers. In relation to this point, GCG object to the densities proposed and states they should be reduced to be in line with the London Plan guidance, particularly in the Meridian Quays district. Strong objections were made to the affordable housing provision and the Council was urged to impose a definite affordable housing percentage on the developer as per the original masterplan. With regards to housing mix, the Group urged the Council to seek a much firmer commitment from the applicant to deliver all types of unit with a prioritisation of family housing over single occupancy units and insisted on a greater average provision for family sized accommodation in those locations nearer to Central Park. The Group accepted that there is some justification for taller buildings in the Meridian Quays and Peninsula Central districts but cannot support proposals for thirty storey towers in the vicinity of Central Park and that buildings in this location should reflect the scale of those already constructed in the vicinity. In addition, GCG consider that the height of development near the through school should be kept to an absolute minimum as to not overwhelm the educational facility. Further information regarding the level of open space provision was required for the group to consider the claim that the masterplan would deliver significantly more open space than the existing masterplan. Overall, the Groups initial consultation response, requested that the number of units be drastically reduced in order to address the concerns regarding density and building heights, required more certainty on the affordable housing offer, housing mix, public realm and open space provision. The Group believed the developer-led approach weakens the Council's position when considering the Reserved Matters applications. In response to the second consultation, the Group welcomed additional material that allayed some criticisms but maintained its objection, particularly on the grounds of a developer-led approach to the masterplan review, the level of residential intensification exceeding the Opportunity Area targets in the London Plan, the densities proposed exceeding London Plan guidance, the height of buildings and impact on living conditions, the commitment towards providing family sized housing, and an inadequate provision of publicly accessible open space.

- **Greenwich Society:** Commended many design aspects but submitted strong objections to the application based on the 57% increase in residential units that exceeds the housing target for the Opportunity Area in the London Plan and Core Strategy; a lack of assurance of level of affordable housing; the increase in density and height of buildings which radically change the riverscape and landscape of Greenwich; object to the distribution of taller buildings across areas where family accommodation will location; increased impact on transport infrastructure; the outline nature of the application and the developer-led approach to the masterplan. Objections were also raised to the low percentage of family sized units proposed, the proposed level of open space and the impact on the road and transport network. Overall the Society requested the application be deferred until the parameters of the masterplan have been separately and independently assessed in light of strategic and local policy and the 2004 masterplan and stressed that the proposals need to be considered in the wider development context that extends beyond the Opportunity Area boundary.
- **East Greenwich Residents Association (EGRA):** Objected to the application on the basis that the scale and degree of change relative to the 2004 masterplan, namely the 50% increase in residential units and housing density and increase in building height is overly aggressive. The Association also believed the consultation period to be inadequate and lacking detail and would expect that such a change to the original masterplan would undergo a more rigorous and transparent process, particularly with regard to visual impact of massing, scale, density and impact on traffic flows in and around Greenwich. The objections were specifically based on the overall residential uplift and its relation to the

London Plan Opportunity Area housing target; the impact on the skyline; the increase in density over London Plan guidance and its impact on transport and social infrastructure; the lack of firm commitment to exact percentage of affordable housing; whether there is an adequate provision for family housing and commercial uses to create a sustainable community; traffic impact in relation to other consented major development in East Greenwich and the level of open space provision proposed.

- **No to Silvertown Tunnel:** Are a group comprising residents in southeast London concerned over the impact of the Silvertown Tunnel proposals, mainly with regards to its potential impact on air pollution and traffic congestion. The Group feel the proposed transport plans for the masterplan are inadequate and believe the GLA, Greenwich Council and Tower Hamlets Council should be looking to urgently provide a pedestrian and cycle link between the Peninsula and Canary Wharf as an alternative to North Greenwich station and without this, any redevelopment on the site will be unsustainable. The Group raise disappointment with the way the consultation has been carried out for such large scale proposals; consider the traffic modelling to be unreliable; that the masterplan is overly reliant on the North Greenwich station which is already heavily congested in rush hour and does nothing to improve connections to the rest of London; and that while welcomed, the new bus station is not large enough and further capacity is required outside of the masterplan area. The Group emphasise that an alternative to the Jubilee Line is critical for a sustainable and economically viable development and believe that a new pedestrian/cycle bridge to Canary Wharf is the most sustainable option and the masterplan provides an opportunity to consider how this could be funded.
- **The Westcombe Society:** The Society fully supports the comments from Greenwich Society and No to Silvertown Tunnel group and strongly objects to the application for the reasons they have summarised. The Society agrees that the red line boundary should be the same as the 2004 Masterplan. Major concerns are also raised with the traffic implications, especially when considered with development already under construction, consented or planned in the area. The Society urged the applicant to provide an overarching transport plan to consider the combined impact of all these development and the implications of Silvertown Tunnel.
- **The Charlton Society:** Strongly objects to the proposals on the following grounds; skimpy consultation; variation to building heights, mix of use, density and sustainability is shocking; it does not respect its context; lack of commitment to affordable housing or community integration; lack of human scale at ground level and place making; no attempt to meet need for family accommodation; a disturbing confidence in the ability for the Peninsula to cope with traffic movements, commuters during peak hours or events at the O2; absence of pedestrian/cycle link to Canary Wharf to mitigate Jubilee Line congestion; no indication of impact of vehicle numbers and pollution of the Peninsula on bordering areas.
- **Friends of Greenwich Park:** Object to the proposals and were dissatisfied with the way the consultation was carried which they considered inadequate. It was requested that more time was allowed for consultation. The Group raised concerns for the potential for the development to generate excessive overcrowding in Greenwich Park due to the increase in potentially 40,000 new visitors. Objections were raised to overall size of the proposal and the proportion of open space provided for new residents. Objections were also raised to the impact on views from the park, particularly from the General Wolfe statue and they consider the alterations to the view to be significantly negative. The Group objected to the height and quantity of the towers and consider lower, less dense tower blocks would sit more appropriately in the view. In response to the second consultation many of the original

concerns remained, in addition to concerns over increased cycle traffic through the park and requested that the committee reject the application.

- **The Blackheath Society:** The Society strongly objected to the application and raised concerns with the cumulative effect of this and others will have on the area, which have not been considered. The objections were based on proposed density and the amount of public open space proposed, in addition to the impact on infrastructure and air quality.
- **Joint response by Greenwich Society, Westcombe Society and East Greenwich Residents Association to the July 2015 consultation:** The objections raised by the groups were maintained to the increase in residential development as a massive overdevelopment of the site when considering other developments coming forward in the Opportunity Area boundary; objections remained to the densities proposed in addition to the methodology for their calculation; objections to the proposed heights of the buildings and their potential to reduce the amenity value of the Central Park and the listed terraces at River Way; advised that further sensitivity testing in the financial viability report is required by the Council's independent assessor; the group considered the affordable housing response as inadequate and objected to the insufficient commitment to deliver an appropriate quantum of family housing; inadequate provision of public open space; impact on road traffic network and public transport and the resultant increase in air pollution; an assessment of the cumulative effect of the masterplan and other consented application in the Greenwich area is required to fully assess the level of impact.

77 The following neighbouring Councils, properties and businesses issued responses to the consultations covering the following issues:

- **Councillor Andrew Wood, London Borough of Tower Hamlets:** Objected to not being consulted. Comments were made on the density proposed and transport impacts in the context of the emerging Isle of Dogs Opportunity Area Planning Framework given the shared use of the Jubilee Line and Blackwall Tunnel. Councillor Wood, urged the Council to consider the proposals in the context of the emerging housing development on the Isle of Dogs.
- **Mangal Pharmacy:** Considered that the 1,462 sq.m. of health care facilities should be located as one new surgery in Peninsula Central rather than split into three facilities spread across the Peninsula as proposed. Comments were made stating that new facilities should not be placed towards the south of the site as this already well served by the existing Greenwich Millennium Practice and associate Newlands Pharmacy.
- **The Horniman Museum:** The Horniman Museum owns land on the area in the Lower Brickfields area of the masterplan and raised concerns over the potential loss of access to their site. These concerns were addressed in revised information.
- **Greenwich Yacht Club:** The Club supports the development of the Peninsula in principle and while the Yacht Club itself is not directly within or adjacent to the application site the club's moorings are and the development will impact on the GYC in a number of ways. The GYC welcomes the potential new significant population and anticipates that the club can offer activities and facilities for new members, including its appetite to develop its growing training and activity program with increased membership. The GYC also highlighted the need for its moorings which extend all the way up Bugsby's Reach to the foot of the cable car. This has been confirmed by the applicant. The proposed enhanced access to the Thames Path was supported and increased lighting and safety measures were encouraged,

as was the need to address the erosion of the mud banks within the environmental infrastructure works to be carried out.

- **Robert Owen Nursery School:** Raised concerns regarding the increasing demand for nursery and children centre spaces and the need for plenty of outdoor space at education and childcare facilities.
- **Wharf Operators (Hanson, Victoria Deep Water Terminal (VDWT)):** Objected to the application based on technical noise matters which may compromise existing and future operations at VDWT but wished to liaise with the developer, Council and Port of London Authority (PLA) in an effort to reach a resolution. The original objections were based on concerns over the lack of protection for the safeguarded wharf operators and nearby residential occupants contained within the application. The representations commented on the noise data and predictions in the relevant section of the environmental statement and requested further noise information and meetings with the applicant and Council. Overall, it was recommended that similar conditions on internal and external noise limits, as included in the Greenwich Millennium Village permission, be included for the outline application. Through continued negotiation and discussion, as set out in this report, the Council, applicant and PLA have agreed suitable worded conditions to provide appropriate noise and air quality assessment and mitigation which were also informed by the Wharf Operators to address the above concerns and safeguard the wharf operations and residential amenity.
- **DTZ on behalf of National Grid Property (NGP) and Southern Gas Networks (SGN):** NGP objected to the application as the outline application seeks permission for comprehensive mixed-use development across a large part of the Greenwich Peninsula, including NGP's land ownership. Whilst NGP supports the principle of development in this area and the significant regeneration benefits that this would bring, but raised concerns that the Knight Dragon scheme has; failed to have regard to the proposed Silvertown Tunnel and associated safeguarding area; has failed to have regard to the HSE consultation zones and associated PADHI guidance; has failed to be assessed against the planning guidance in the Greenwich Opportunity Area Planning Framework 2012; has failed to consult with NGP in relation to their land holdings and future development aspirations and does not make best use of land around the Silvertown Tunnel approach road. In summary, NGP formally objected to the application on the above ground and strongly requested that engagement takes place between all key stakeholders.
- **Montagu Evans on behalf of AEG Ltd:** AEG Ltd have significant land interests on the Peninsula, most notably the O2 Arena and a number of other land holdings, including Plots NO201 and NO301 of the 2004 masterplan. While generally supporting the aspiration for an up to date masterplan, AEG raised concerns with a number of aspects of the masterplan, particularly the lack of certainty provided by the outline application and how the unknown built form may affect the O2 Arena. It sets out that such certainty is essential to landowners when compiling long term investment strategies. The main concerns relate to the nature of the proposed development design District development and the time scales for its delivery in order for them to consider the potential impact on the O2 Arena; further information was required on the reprovided/relocated AEG car parking for the O2 Arena and the associated access arrangements; further information and certainty over the pedestrian route from the station interchange hall to the O2 parking facility in order to ensure its delivery in an appropriate timescale to minimise disruption to the users of the O2; further information and to ensure that the phased re-provision of the North Greenwich Transport Interchange will maintain the full existing operational capacity throughout the works associated with the development; further information regarding the nature of the 20,000 sq.m. D2 floorspace proposed to enable a robust assessment of the impact upon

the district centre which contains the existing O2 Arena; concerns over the nature and quality of the route from the underground station to the O2, Plot NO201 and Peninsula Square and the level of detail secured in the parameter plans given its fundamental to providing public access to the O2 and Transport Interchange and requested that full details be submitted; AEG also requested confirmation from the applicant that access to the O2 Arena, Plot NO201 and NO301 will not be restricted during the construction process. In addition, AEG have aspirations to redevelop Plot NO201 for a residential-led mixed use scheme which will be much more sensitive to daylight and sunlight impact from the proposed masterplan massing and requested that the Council take these aspirations into consideration when determining the proposals. In response to AEG's concerns, the Council considered that the level of detail provided is sufficient for an outline application.

78 The statutory responses and those received from local amenity and interest groups, Councillors, local businesses and landowners to the Council's consultation do not raise any material planning issues of strategic importance that have not already been considered by the Mayor at the consultation stage and/or in this report or addressed in detail within the Council's planning committee report.

Article 7: Direction that the Mayor is to be the local planning authority

79 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

80 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

81 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

82 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

83 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any Reserved Matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

84 The concerns raised during the consultation stages regarding , safeguarded wharves, affordable housing, residential quality and amenity, air quality, sustainable development and transport have been satisfactorily addressed through the provision of appropriate planning conditions, obligations secured by section 106 agreement, or through the submission of further information and the proposals are now supported in strategic planning policy terms.

85 The Greenwich Peninsula Masterplan will help to deliver a key element of the Mayor's City in the East program and will make a significant contribution to London's growth and its status as a world city. This development will deliver an exemplary urban environment, at a high density with views to the City and Canary Wharf and the developer's ambition and commitment to quality are applauded.

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