

Ogilby Housing Society Site

Wellington Street, Woolwich, SE18

18 February 2016

in the Royal Borough of Greenwich

planning application no. 15/3295/F

Strategic planning application stage 1 referral

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

The proposal

Full planning application to replace existing 2 and 3 storey buildings providing 25 affordable homes with a single residential block of between 7 storeys and 13 storeys that would contain 116 private flats comprising: 42 x 1 bed; 49 x 2 bed; 24 x 3 bed; 1 x 4 bed units, together with associated public realm and cycle and car parking.

The applicant

The applicant is **Ogilby Housing Society Limited** and the architect is **BUJ Architects**.

Strategic issues

The delivery of **new housing** is supported by strategic planning policy. However, for the reasons set out in this report, the application does not comply with the London Plan in a number of areas, most notably in respect of **affordable housing**, but also in respect of **urban design**, **inclusive design**, **energy** and **transport**.

Recommendation

That the Royal Borough of Greenwich be advised that whilst the application is supported in principle in strategic planning terms, it does not comply with the London Plan; but that the possible remedies set out in paragraph 92 of this report could address these deficiencies.

Introduction

1 On the 12 January 2016 the Mayor of London received documentation in respect of a notification from the Royal Borough of Greenwich of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor may provide the Council with a statement setting out whether he considers the application complies with the London Plan and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following category of the Schedule to the Order 2008:

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

3 Once the Royal Borough of Greenwich has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the borough to determine it itself. The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

4 The site is approximately 0.27 hectares in size and currently contains a series of now vacated two and three storey purpose built affordable housing buildings formally providing 25 affordable flats. The two storey buildings face onto Wellington Street with the three storey buildings at right angles to Wellington Street. A small alleyway passes along the eastern edge of the site connecting Wellington Street with Love Lane and small domestic gardens back onto the larger Woolwich Central development site at the rear of the properties.

5 The site lies within the southern part of Woolwich Town Centre and forms part of a larger site (Woolwich Central) bounded by Wellington Street, Grand Depot Road/Woolwich New Road and John Wilson Street (the South Circular). This larger site contains the substantially complete phase 2 of the Woolwich Central redevelopment scheme, a large Tesco store, car parking and new homes and public realm. Beyond the larger Woolwich Central site is General Gordon Square which forms a key pedestrian link to Woolwich Arsenal station and the wider town centre.

6 To the south of the site, across Grand Depot Road, is a housing estate off Claydown Mews consisting of 2/3 storey mews type housing developed in the early 1990's. Army barracks are located on the opposite side of John Wilson Street and the twenty four storey Elliston House is situated adjacent to the barracks. The southern section of Wellington Street comprises predominantly 2-4 storey residential properties and the Royal Borough of Greenwich's civic offices are located to the east of the application site.

7 The site is well served by public transport with the closest railway station being Woolwich Arsenal approximately 700m away which has DLR and National Rail services. Bus stops serving 17 services are located within 400m of the site. The PTAL rating of the site ranges from 6a to 6b which represents excellent accessibility in a range where 1 is the lowest and 6b the highest. There is a Riverbus pier 1km walk away with regular services upstream to Canary Wharf, the City and central London. Wellington Street connects to John Wilson Street (which forms part of the Transport for London Road Network).

Details of the proposal

8 The planning application originally proposed a new single residential building of between 9 and 15 storeys that would have provided 124 new flats. The applicant has however subsequently revised its scheme to provide a similar but smaller building of between 7 and 13 storeys and a reduction in the number of units to 116. Details of the scheme's design are set out in the urban design section below.

Strategic planning history

9 A pre-planning application meeting was held with the applicant and its representatives at City Hall on the 9 September 2015 where the following matters were discussed and advice offered by GLA and TfL officers.

New housing

10 The delivery of the proposed new housing was supported as it would assist the Royal Borough of Greenwich meet its current housing provision monitoring target of 2,685 units a year as set out in Table 3.1 of the London Plan.

Affordable housing

11 Affordable housing discussions were limited, but the applicant was advised that the London Plan requires new housing schemes to deliver the maximum reasonable level of affordable housing they can taking account of funding and viability, that new affordable housing should generally be provided on site, and that the Plan also emphasises the delivery of affordable family accommodation. The applicant was also referred to London Plan policy 3.14 (Existing housing) which resists the loss of existing housing of all tenures and confirms that where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality affordable housing of at least an equivalent floorspace.

12 The applicant confirmed that Ogilby Housing Association Limited was a self-funded *Exempt Charity* which under its rules, is tasked with providing housing for “persons of limited means upon terms appropriate to their means”. It also advised that the blocks it was proposing to demolish were approximately 65 year old and were incurring substantial repair and maintenance costs, did not (or shortly would not) contain any long standing tenants, and that the housing society wished to use the receipt from the sale of the site to modernise other flats it has in Greenwich and “towards assets it holds in Havering”.

13 The applicant was therefore advised that it should prepare and submit a viability assessment with its application that clearly set out the assumptions and values used to arrive at the level and nature of the any proposed affordable housing and that this should then independently assessed by the Council with both reports shared with GLA officers so that they and the Mayor could be satisfied that the maximum reasonable level of affordable housing would be provided.

Housing mix

14 The applicant confirmed that 25 (17%) of the 142 flats it was proposing would be family sized units (i.e. 3 or 3+ bedrooms) and GLA officers suggested that this be increased with a focus on affordable family units to reflect London Plan policy 3.11 (Affordable housing targets) which confirms the strategic priority of affordable family housing.

Housing quality

15 The applicant was advised that all the proposed units should demonstrably meet the housing standards set out in the London Plan and the Mayor’s Housing SPG and Design Guide, which in turn would be expected to be conditioned and/or included within any S106 agreement.

Children’s play space

16 Officers advised that a detailed play strategy would be expected as part of the application that demonstrated how the scheme would meet Mayoral play space requirements and that door-stop play provision would be expected on-site for the under-five’s. The applicant was also advised to review of existing facilities in the immediate area as it might be necessary to provide new on-site play facilities for older children, and/or provide a financial contribution to the provision, or improvement, of off-site play facilities.

Urban design

17 The scheme's overall approach to urban design was supported at the pre-application stage but officers confirmed the importance of securing connectivity improvements, particularly in respect of how routes into the site towards Love Lane would be defined and made fully accessible. Careful consideration to the scheme's relationship with neighbouring buildings and proposals was also stressed, as was the need for access and servicing arrangements to ensure that legible and safe pedestrian access would be prioritised over vehicles.

18 Officers also suggested that the applicant demonstrate how the positioning of the new building would result in a high quality of public realm and to explore opportunities for additional pedestrian links between Love Lane and Wellington Street. The need for daylight/sunlight analysis in order to optimise the amount of usable south facing amenity space was stressed and concerns were raised in respect of the extent of the recycling/refuse/cycle store frontage along Love Lane.

19 Finally, officers advised that the proposed height did not raise specific strategic issues, but opportunities to introduce more contrasting and varied massing elements should be explored.

Inclusive design

20 It was confirmed that all new housing should meet Lifetime Home standards and 10% should be fully wheelchair accessible. It was also confirmed that submitted plans should make clear the location and tenure of the wheelchair accessible homes. The need for routes from public transport facilities to the proposed entrances to be legible and clearly identifiable was also stressed, as was the need for the submitted design and access statement to show how disabled people access each of the entrances safely and include details of levels, gradients, widths and surface materials of the paths, how they would be fully segregated from traffic and turning vehicles, and how level changes on the routes would be addressed.

21 The applicant was finally advised that one blue badge accessible space would normally be required for each wheelchair unit and that offsite solutions should be explored to address any onsite shortfall.

Sustainable development

22 The applicant was advised to address climate change adaptation (including measures to manage the urban heat island); overheating; solar gain; flood risk; measures to minimise water usage; measures to protect and enhance green infrastructure, biodiversity and refuse and recycling within any planning application and ensure that its refuse and recycling strategy took account of and be designed to fully accord with the Royal Borough of Greenwich's current and anticipated approach to recycling and waste streams.

Energy

23 The applicant was advised to provide evidence to show how it would meet London Plan policy requirements and particularly consider how best to mitigate any restrictions posed by local air quality or noise issues, ground floor apartments and single aspect south facing dwellings.

24 It was noted that the site is situated within the Woolwich Arsenal district heating (DH) opportunity area and the applicant was advised to contact the local energy officer to see if there are any DH network opportunities currently being developed in the area and to provide evidence of correspondence.

Transport

25 Advice on car and cycle parking, transport assessment, trip generation, connectivity and construction logistics, delivery and servicing and CIL was offered to help the applicant demonstrate full compliance with relevant London Plan transport policies.

Strategic planning issues and relevant policies and guidance

26 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; Draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Children And Young People's Play And Informal Recreation SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

27 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Greenwich Core Strategy and Development Management Policies Development Plan Documents 2014 and the 2015 London Plan (Consolidated with Alterations since 2011).

28 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- National Planning Practice Guidance.
- Draft Minor Alterations to the London Plan (MALP), May 2015.
- Woolwich Town Centre Masterplan SPD, April 2012.

Housing

Introduction

29 The provision of additional homes in this highly accessible location is strongly supported and would assist the Royal Borough of Greenwich meet its housing supply monitoring target of 2,685 units a year as set out in Table 3.1 of the London Plan.

Housing mix

30 As set out above, the applicant's revised scheme proposes the following housing mix:

One bed	42 (36%)
Two bed	49 (42%)
Three bed	24 (21%)
Four bed	1 (<1%)
Total	116

31 The proposed level of family housing (circa 22%) is supported given the site's location and the scale and form of the development. It is also an increase from the 17% proposed at pre-application stage, though the actual number of family units has reduced from 29 to 25 to reflect the reduced bulk and massing the applicant is now proposing.

Affordable housing

32 The application site currently contains 25 formally affordable homes owned by the *Ogilby Housing Society*, a "self-funded Exempt Charity tasked with providing housing for persons of limited means upon terms appropriate to their means". The society has indicated that it might use receipts from the sale of the application site to modernise other flats it owns in the Royal Borough of Greenwich and to modernise and build new flats in the London Borough of Havering - with "any remaining capital receipts being used in furtherance of the Society's aims as and when good economic opportunities occur".

33 However, despite being requested at the pre-application stage, no further detail, programme or on or off site affordable housing commitment has been forthcoming, nor has the location or nature of other affordable accommodation the society holds been confirmed. It has however confirmed that it is not a Registered Provider and it has not explored the possibility of public funding to provide new onsite affordable housing. The application's approach to affordable housing must therefore be considered solely in terms of the submitted scheme

34 London Plan policy 3.14 (Existing housing) confirms that the loss of affordable housing should be resisted and not permitted unless it is replaced by better quality accommodation, providing at least an equivalent amount of affordable housing. London Plan policy 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes) also confirms that the maximum reasonable amount of affordable housing should be sought by planning authorities having regard to current and future requirements at local and regional levels, affordable housing targets, the need to promote mixed and balanced communities, the size and types of affordable housing needed in particular locations and site circumstances and resources.

35 Furthermore, policy 3.12 confirms that negotiations should take account of individual circumstances including development viability, the availability of public subsidy, the implications of phased development (including provisions for re-appraising the viability of schemes prior to implementation) and other scheme requirements.

36 The applicant did submit a viability report to the Royal Borough of Greenwich in October 2015 which suggested that the scheme at that time might be able to deliver 11% affordable housing – though the nature of those units was not clarified and hence a full viability assessment was not possible. The applicant however now advises that it has produced and submitted a revised viability report to the Council which demonstrates that the current scheme cannot now viably provide any affordable housing.

37 This new material has however not been shared with the GLA, nor has the Council's review of either reports provided. This material and detail should therefore be provided in order for the Mayor in due course to be able to reach an informed view on the applicant's proposition that the scheme cannot reasonably make any affordable housing contribution. The validity of the comparable flats the reports use should also be rigorously assessed by the Council as well as the quality (and hence value) of the existing flats which the applicant contends are in very poor condition. Regard should also be had to London Plan policy 3.11 (Affordable housing targets) which as well as looking to maximise affordable housing provision, looks to achieve 60% of new affordable housing provision as either social and affordable rent and 40% for intermediate rent or sale, with priority accorded to provision of affordable family housing.

38 Given the potential loss of 25 units of existing affordable housing, the lack of certainty on where and how any sales receipt might be used, and the fact that no on site affordable housing is now proposed, the application fails to comply with the affordable housing policies of the London Plan as GLA officers are not convinced that a scheme of this nature and scale cannot reasonably provide any verifiable affordable housing in the context of London's unprecedented house values and the physical and transport improvements Woolwich has and will continue to enjoy.

Children's play space

39 London Plan policy 3.6 states: "development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs". The Plan also recommends that the methodology within the Mayor's 2014 supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation' SPG should be used to estimate child yield.

40 The applicant has used this methodology which suggests that 36 children might be expected to live within the completed development. This would give rise to a minimum play space requirement of 360 sq.m. with 155 sq.m. needing to be specifically designed for children under five and provided on site.

41 The applicant has identified 285 sq.m. of space within its ownership where such play space could be provided and anticipates older children using nearby facilities. The Royal Borough of Greenwich should therefore verify the usability and accessibility of these facilities and include a condition requiring the onsite play space to be provided should it grant permission, ensure the new play spaces would be attractive and usable by intended age groups and that the principles and good practice set out in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG would be followed. Revised plans based on final expected child yields should also be prepared if the number of units or unit mix changes again or if an element of on-site affordable housing is agreed.

Urban design

42 The scheme has been designed to reflect the Thomas Street/Woolwich Central masterplan by helping define and create new pedestrian routes towards Woolwich Town Centre along Love Lane to the south of the site and Wellington Street to its north. In addition, the building is set back from the proposed point block at the eastern end of the masterplan area to provide connectivity between Wellington Street and Grand Depot Road, with vehicular access and a small parking surface parking area at its eastern end. This is supported

43 The applicant has set back the northern frontage of the western most portion of the block by approximately a metre to include an area of hard surfacing/car parking. Officers would welcome further clarity as to the need for this amendment and confirmation that the internal floor areas within this portion of the block do not fall below the Mayor's space standards as a result. Some concern is also raised in relation to the resulting weakening of the street frontage along Wellington Street. The applicant should therefore give further consideration to the configuration of this portion of the block and also its relationship with the footprint of the proposed point block which neighbours the site to the west as the current layout and massing arrangement does not appear to provide any meaningful relationship with it and the legibility of the pedestrian link into Love Lane is likely to be compromised as a result.

44 The applicant has further developed the landscaping and public realm strategy along the southern edge of the block and Love Lane and this gives a clear indication of the location of pedestrian routes, children's playspace and areas of shared amenity. While the constraints resulting from the significant level changes across the site are noted, further detail is needed to demonstrate how the layout of routes are designed to provide a fully accessible and legible sequence of public realm that is aligned with wider connections to the town centre and to individual residential entrances to the block.

45 Officers are also concerned that the primary pedestrian link running along the edge of the neighbouring Woolwich Central Phase 4 development appears squeezed and the applicant is encouraged to explore introducing a more generous and welcoming link. In addition and as discussed at pre-application, the applicant should demonstrate how the proposed public realm strategy responds to the servicing access arrangements to the northern edge of the neighbouring Woolwich Central Phase 4 development as well as ensuring sufficient levels of passive surveillance through well designed active frontages.

46 It is noted that the masterplan and earlier iterations of the scheme included two nodal points of activity at either end of the proposed block and the applicant should explore means of denoting these spaces through variations in the widths of public routes and green open spaces as the current sequence of routes appears overly regimented.

47 As raised at the pre-application stage, the eastern edge of building remains dominated by refuse and cycle storage frontages and a parking zone which will limit opportunities for passive surveillance and activity as well as potentially creating conflicts between vehicles and pedestrians, particularly for disabled or visual impaired people and children.

48 Submitted views from Wellington Road also suggest that the undercroft would not present a welcoming pedestrian link towards Love Lane and the applicant should work to optimise the quality of this link to ensure this does not become isolated and insecure as a result.

49 As also previously discussed with the applicant, the opening up of the block into two separate elements would provide an opportunity for a better-defined link between them and would also give potential to develop a more sympathetic and refined massing configuration.

Notwithstanding the concerns set out above, the submitted floor plans suggest that a high quality of accommodation can be achieved through a mansion block typology with individual entrances to all ground floor units, which with well-defined entrances to cores and through access, will help achieve good levels of street-based activity, which is welcomed.

50 The residential layouts at upper levels are supported and the applicant has included a high proportion of dual aspect units. However, and as raised previously, single aspect north facing units should be avoided and while it is acknowledged that these are duplex units and are therefore capable of achieving greater daylight penetration through double height spaces, officers strongly advise the applicant to explore the inclusion of *hinged* duplexes in order to maximise dual aspect ratios across the scheme. Should this not prove feasible, clear justification is needed through *Average Daylight Factor* analysis to demonstrate how daylight/sunlight penetration to these units in particular would be acceptable.

51 Consideration should also be given to single aspect south facing units and measures for providing shading to avoid overheating should be designed into the façades of the block. Shared roof level amenity areas should also be designed to provide sufficient shelter to provide comfortable and usable spaces.

52 Whilst the proposed height is supported in this very accessible town centre location, the applicant intends to implement a massing strategy that follows the gradual stepping up in scale up the slope from the town centre toward the standalone residential point block (outside of the application site). Officers reiterate the view that having considered the earlier massing options this is not recognised as being the most appropriate strategy for the site and its context and there is an opportunity to introduce a more contrasting and varied series of massing elements.

53 It is however noted that the Council has put forward a preference for a continuous and unbroken frontage onto Wellington Street and on balance and subject to addressing the strategic design issues set out above, GLA officers could support the proposed massing arrangements. Nevertheless, the applicant should consider and confirm how the building form has been designed to optimise the quality of the pedestrian environment at ground level, particularly at the block's western end where a canyon effect is likely to result due to the proximity and scale of the neighbouring point block. The applicant should therefore conduct wind and daylight/sunlight studies and introduce any necessary mitigation measures accordingly.

54 Finally, the architectural approach to the site is supported in principle, which includes the use of high quality brick work and simple detailing and articulation. The Council is encouraged to secure key details including window reveals, balconies and facing materials to ensure the highest possible quality of architecture is realised.

Inclusive design

55 The applicant has confirmed that all residential units would be designed to Lifetime Home standards and that 10% of the units would be designed to be wheelchair accessible or be easily adaptable for residents who are wheelchair users and has shown where the wheelchair accessible homes would be located. It should though confirm that they would be distributed across all tenures and unit sizes once these matters have been finalised.

56 As advised at pre-application stage, it should also show how disabled people would access each of the entrances safely and include details of levels, gradients, widths and surface materials of all public realm connections, show how these would be fully segregated from traffic and turning vehicles, and how level changes on the routes would be addressed.

57 The applicant should also seek to provide one blue badge accessible space for each wheelchair unit and explore and provide off site spaces to demonstrate full compliance with the London Plan.

Flood risk

58 The submitted Environmental Statement (ES) confirms that the site is located within Flood Zone 1 and there are no significant areas of surface water flood risk. Therefore the proposals are acceptable in respect of London Plan policy 5.12 (Flood risk management).

59 The ES indicates that the development will include green roofs and other landscaping which should be designed to attenuate and/or absorb as much rainwater as possible. In addition, the new greenspace immediately adjacent to the site and part of the wider redevelopment of this part of Woolwich offers good opportunities for rainwater absorption.

60 However, whilst the site itself is not at significant risk of surface water flooding, other areas within and in the vicinity of Woolwich Town Centre are at significant risk, and surface water from this site will be a contributory factor to this risk. The application of London Plan policy 5.13 (Sustainable drainage) is therefore an important consideration for this application. The submitted Environmental Statement (ES) states that the development will not increase surface water run-off. However, this is an unacceptable interpretation of London Plan policy 5.13 (Sustainable drainage) which calls for developments to use the sustainable drainage hierarchy to achieve as close to a greenfield run-off rate as is practical.

61 The applicant therefore needs to reconsider the approach to rainwater management and propose measures that will reduce surface water run-off rates by at least 50% compared to the current site. This should be submitted prior to any Stage 2 planning referral to the Mayor. In summary, the proposals do not comply with London Plan policy 5.13 (Sustainable drainage) and require a fresh approach to surface water drainage.

Energy

Overview

62 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information are however required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Energy efficiency standards

63 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

64 The demand for cooling will be minimised through cross ventilation, shading from balconies and the inclusion of green roofs and the development is estimated to achieve a reduction of 20 tonnes per annum (13%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

District heating

65 The applicant has carried out an investigation and there are no existing district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

66 The applicant is proposing to install a site heat network. The site heat network will be supplied from a single energy centre and located in the basement.

Combined heat and power (CHP)

67 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

68 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a 64kWp Photovoltaic (PV) array on the roof of the development. A roof layout drawing has been provided. A reduction in regulated CO₂ emissions of 33 tonnes per annum (23%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

69 Based on the energy assessment submitted at Stage 1 a reduction of 52 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%. This carbon dioxide savings would meet the target set within policy 5.2 of the London Plan and the application is acceptable in strategic energy planning terms.

Transport

Car parking

70 The car free nature of the site, except for 4 blue badge parking spaces, is supported given the site's location. However, London Plan policy 3.8 (Housing choice) requires 10 per cent of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users, and the Housing SPG states that each wheelchair accessible dwelling should have an associated accessible parking space. Therefore, there should be 12 Blue Badge spaces included within this development compared to the four proposed, and more details regarding the management and allocation of the ultimately agreed Blue Badge parking should be provided.

71 There is currently no reference to the provision of electric vehicle charging points (EVCPs). These should be provided in accordance with the standards set out in London Plan policy 6.13 (Parking) and Table 6.2. A minimum of one active charging point and one passive point should therefore be provided and secured by condition.

72 TfL welcomes the applicant's commitment to all future residents being prevented from applying for a residents parking permit and this should be secured as part of any section 106 legal agreement.

Car club

73 Due to the car-free nature of the development, the use of car clubs in the immediate area should be encouraged. Car club spaces located nearby in the Woolwich Central development are identified in the submitted Transport Assessment (TA) and Travel Plan and therefore free car club membership for all residents of the development should be secured within any section 106 legal agreement. The applicant is asked though to provide further details to demonstrate that these car club spaces and the associated vehicles are not already, or will be, oversubscribed without adding in demand from this development.

Cycle parking

74 Cycle parking provision is provided in accordance with the standards set out in London Plan policy 6.9 (Cycling) and this is welcomed. TfL supports the provision of visitor parking spaces; however it is unclear from the ground floor layout plan and TA how certain cycle parking areas would be accessed. How these parking areas would be accessed from the south and east by pedestrians and cyclists should therefore be clarified.

75 Cycle stores 3 and 4 to the rear of the development appear to require the user to carry cycles up and down steps. Level access to cycle parking areas must be provided as it cannot be assumed that all users can carry their cycles. Relying on the internal corridors for cycle users to access these storage areas from Wellington Street does not present an option which delivers on London Plan policy to encourage cycling.

76 The London Plan also requires a minimum of 205 long-stay and three short-stay cycle spaces and TfL suggests that these three short-stay spaces should be easily accessible for non-residents. Currently these spaces are situated within the ground floor and basement secure storage which limits access. More details should therefore be provided in the TA or in an Estate Management Plan on how visitors to the site would access and make use of these spaces. The alternative would be to amend the proposals to provide short-stay spaces in an accessible area.

77 Cycle parking should also be designed in accordance with the London Cycling Design Standards (LCDS). Currently all cycle parking is provided in the form of double stackers and the LCDS recommends that at least 5 per cent of all spaces should be capable of accommodating a larger cycle. More details should be provided on the provision of facilities for larger and adaptable cycles. All cycle parking should be secured by condition.

Local cycle routes and infrastructure

78 There is only very basic analysis of local cycle route provision in the TA and it would have been beneficial to see more consideration given to how to make links from the development to other local routes and destinations. The applicant should therefore undertake a short exercise to assess and map the level of service for cyclists in the local area and show how the proposal would support people cycling to and from the site, especially given the car free nature of the proposal. Examples of appropriate mapping methodologies are provided in chapter 2 (pages 14 to 21) of the LCDS.

79 TfL will also seek contributions towards two planned schemes in the vicinity of the site as a result of the additional walking and cycling trips that would be generated by the development.

80 John Wilson Street (A205) is the only north-south route for cyclists in the local area and forms part of the South Circular Road, which is TLRN, to the west of the site. TfL and the Royal Borough of Greenwich share aspirations to implement a South Circular upgrade scheme including segregated cycle lanes. The total cost will be approximately £800,000. The scheme design is currently being amended following stakeholder comments and subsequently this will go out to public consultation. The current programme estimates a completion year in 2018 subject to funding and necessary approvals, which would coincide with the expected occupation of this development. TfL seeks a s106 contribution of £75,000 towards the South Circular Road cycling scheme which would directly mitigate the impacts of the development.

81 TfL's Regional Improvement Programme is currently looking at a scheme to improve the flow of traffic and increase pedestrian safety at the John Wilson Street (A205)/Artillery Street/Wellington Street crossroads, immediately to the west of the site, which would also directly benefit the development and mitigate its impacts. The scheme involves installation of countdown signal crossings and other measures at an estimated cost of £150,000. The scheme is currently progressing well and the modelling has been successful, which will allow the scheme design to be finalised. The current programme estimates that the scheme could be constructed towards the end of 2016/2017 financial year subject to funding being available and necessary approvals. TfL seeks a section 106 contribution of £75,000 towards this scheme.

Delivery and Servicing Plan

82 There is a lack of detail regarding the total number and frequency of expected vehicular movements generated by the proposed development in relation to any delivery and servicing requirements for the site. Furthermore, the submitted TA states that delivery and servicing vehicles would wait on Wellington Street whilst unloading, utilising the existing on-street parking area along the south side of the street. However, there is no information on the predicted usage of these spaces; and despite smaller vehicles being able to turn around in the site there is also a lack of clarity or identified alternative arrangements for larger vehicles if the parking spaces on Wellington Street are occupied.

83 The requirement for vehicles to stop on-street, including refuse collection vehicles, may have an impact upon the operation of Wellington Street and TfL would be concerned if there were any impact on the junction with the TLRN. The submitted TA states that bins will be collected as per the existing arrangements, however it has failed to address the increase in the number of residential units. A Delivery and Servicing Plan (DSP) should therefore be prepared for the site, addressing the comments above and secured by condition by the Council should planning permission be granted.

Travel Plans

84 TfL welcomes the submission of the Travel Plan which aims to promote sustainable travel to and from the site. The Travel Plan has passed the ATTrBuTE assessment used by TfL to assess its content, however, TfL requests that the targets for encouraging walking and cycling are more ambitious, and the current target to increase in the proportion of daily trips made by walking and cycling (by 10% within 3 years and 20% within 5 years) should be increased and discussed in more detail with TfL. The Travel Plans and all agreed measures therein should be secured, enforced, monitored and reviewed as part of any section 106 agreement.

Construction Logistics Plan

85 There is a lack of detail regarding access to the site for construction vehicles, the length of the construction programme and the estimated number of construction vehicles generated by the site or what routes they will use. Therefore, in accordance with London Plan policies, TfL would expect a Construction Logistics Plan (CLP) to be produced and secured by condition. There are a number of restrictions of use of the TLRN that TfL will insist upon and these should be set out in the CLP.

Mayoral CIL

86 The Mayoral CIL applies for any new application and is charged at a rate of £35 per square metre (based on the gross internal floor area) in the Royal Borough of Greenwich. The CIL would be payable on commencement and the collection of the CIL would be administered by the Council who would transfer the payment to the Mayor/TfL.

Summary

87 Overall, TfL has no significant objections to the principle of the proposed development. However, TfL considers that further work is required by the applicant with respect to the Blue Badge parking, electric vehicle charging points, detailing local cycle infrastructure, cycle parking provision, travel planning, and delivery, servicing and construction impacts in order to comply with the transport policies of the London Plan. TfL will also seek a contribution towards the junction improvements identified above and will be pleased to discuss this further with the Royal Borough of Greenwich and the applicant.

Local planning authority's position

88 This is not known at this stage.

Legal considerations

89 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view.

90 Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

91 There are no financial considerations at this stage.

Conclusion

92 Whilst the application is supported in strategic planning terms, the application does not currently comply with the London Plan in a number of important areas. The following changes might however remedy these deficiencies and could lead to the application becoming compliant with the London Plan:

- **Housing and affordable housing** – The delivery of new housing is supported, as is the proposed mix of unit sizes, however as currently submitted, the Mayor is not satisfied that the maximum reasonable level of affordable housing would be provided and hence the proposal is contrary to the London Plan. This should be urgently addressed by the applicant and the Council as set out above.
- **Children’s play space** – The approach is supported but may need to be revisited should anticipated child yield change.
- **Housing quality and urban design** – The broad approach is supported but the urban design matters set out in this report should be fully addressed.
- **Inclusive design** – The inclusive design matters set out above should be fully addressed.
- **Energy** – The applicant has demonstrated compliance with current London Plan policy requirements.
- **Transport** – Further information is required to assess and mitigate the current impacts of the scheme and to demonstrate full compliance with current London Plan policy requirements. TfL also wishes to discuss specific mitigation measures that would be secured through appropriate S106 contributions, clauses and conditions.

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