

14 January 2016

Plot N0201, Greenwich Peninsula (Land adjacent to and South West of the O2 Arena)

in the Royal Borough of Greenwich

planning application no. 15/3552/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

Construction of a 36 storey tower (120 metres AOD) and a ten storey building (47.3 metres AOD) with shared ground and mezzanine floor comprising 395 residential units, 892 sq.m. retail floor space (Use Classes A1 to A5), 158 sq.m. flexible floorspace (Use Classes A1 to A5, ancillary C3 for residential gym, or D2 for a commercial gym) and associated landscaping, plant, servicing and parking.

The applicant

The applicant is **AEG Europe**, and the architect is **Lifschutz Davidson Sandilands**.

Strategic issues

The principle of the proposed **residential-led, mixed-use redevelopment** of the site is supported in strategic policy terms and in the context of the 2015 Greenwich Peninsula masterplan.

Specific issues relating to **housing, affordable housing, play space, urban design, inclusive design, sustainable development, flood risk** and **transport** should be resolved prior to the final decision making stage.

Recommendation

That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 73 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 26 November 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. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 and as agreed with the Council, the Mayor has until 14 January 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A and 1C 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."

1C(c) – "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London."

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

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

Site description

5 The site is located immediately to the south of the O2 Arena and North Greenwich Interchange on the Greenwich Peninsula. Given the location, the site benefits from excellent transport links; being served directly by the Jubilee Line, several bus routes and the Thames Clipper boat service, as well as having close connections to the DLR and wider rail network. As a result the site records a public transport accessibility level of 6a, on a scale of one to six, where six is excellent. Pedestrian connectivity to the site is further enhanced by the Emirates Airline cable car, which also provides convenient access to the Royal Docks and London City Airport.

6 The site lies within the Royal Borough of Greenwich (RBG), located within the radius of one of the River Thames oxbow turns. Its position is across the river from Canary Wharf and the Docklands area with historic Greenwich, Greenwich Park and the heart of Greenwich Village to the south west of the site, accessed via the A102.

7 In 2010, under the original 2004 Greenwich Peninsula masterplan consent (LPA ref: 02/2903/O), detailed planning permission was granted for an eight storey, office-led mixed use building comprising 18,659 sq.m. of office floorspace and 2,339 sq.m. of flexible retail/food and drink floorspace (LPA ref: 10/0280/F) on the application site. However, the wider Greenwich Peninsula site is subject to a new masterplan which was granted planning permission in December 2015 (LPA ref: 15/0716/O) and aims to intensify residential development on the peninsula and significantly reduces the quantum of office floorspace previously granted permission.

Details of the proposal

8 Construction of a 36 storey tower (120 metres AOD) and a ten storey building (47.3 metres AOD) with shared ground and mezzanine floor comprising 395 residential units, 892 sq.m. retail floor space (Use Classes A1 to A5), 158 sq.m. flexible floorspace (Use Classes A1 to A5, ancillary C3 for residential gym, or D2 for a commercial gym) and associated landscaping, plant, servicing and parking.

Case history

9 The applicant engaged in pre-application discussions with GLA officers in October 2015. The discussions concluded that while the principle of the proposed residential-led, mixed-use development of this site could be supported in strategic planning terms given the changing development context on the Peninsula, the proposed loss of employment space at this site required further robust justification before it could be considered fully acceptable. Furthermore, the proposed height and scale of the residential tower raised some concerns as it had not been considered as part of the wider massing studies undertaken to inform the 2015 masterplan and officers considered that this has the potential to undermine some of its key design principles. However, the applicant was advised that these concerns may be overcome subject to the urban design and residential quality issues set out within the accompanying report being fully addressed.

10 In addition, further information and clarification was sought regarding housing provision, transport, inclusive access, and energy.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan*
- 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;*
- Tall buildings *London Plan, Revised View Management Framework SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Energy & sustainability *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*

12 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 London Plan (Consolidated with Alterations since 2011).

13 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.

- Outline planning permission for the Greenwich Peninsula masterplan (reference 02/2903/0) granted permission in February 2004.
- Greenwich Peninsula 2015 masterplan outline application (reference 15/0716/O) with respect to which Greenwich Council resolved to grant permission on 8 September 2015.
- Draft Minor Alterations to the London Plan 2015.

Principle of development

14 As set out above, Greenwich Peninsula is identified as an Opportunity Area in the London Plan (Map 2.4). Annex 1 of the Plan provides further policy guidance under ref 13, Greenwich Peninsula, and identifies this area as an internationally significant leisure attraction and as a major contributor to meeting London's need for additional housing, that is capable of delivering 13,500 new homes and 7,000 jobs.

15 As set out above, Plot N0201 benefits from detailed planning permission for an eight storey office-led mixed use building which was granted in the context of the original 2004 masterplan. The current proposals for the site seek to revisit the existing consent in the context of the recently approved 2015 masterplan proposals and redevelop the site for a residential-led, mixed-use development, including a tall building.

16 While the proposed land use is acceptable in strategic planning terms, the proposed scale and massing is significantly larger than what was envisaged under the existing consent for this plot and was not considered as part of the wider massing studies undertaken to inform the revised masterplan and does raise some potential strategic concern. However, these may be overcome subject to the urban design comments set out within this report being satisfactorily addressed.

Loss of employment floorspace

17 The revised proposals do not provide the B1 office floor space approved under the existing outline consent for Plot N0201 and seek to replace it with a predominantly residential building with non-residential uses at ground floor. The proposal would therefore effectively result in the loss of employment floorspace (and jobs) envisaged to be delivered at this site compared to the existing consent.

18 Whilst this does not raise an objection in principle, given the strategic aspirations to provide a minimum of 7,000 jobs within the Opportunity Area, the applicant was requested at the pre-application stage to provide further information to justify the loss of employment floorspace, and clearly set out the estimated employment yield for the revised proposals in comparison to the existing consent.

19 In response, the applicant has set out that since gaining planning consent in 2010, extensive marketing exercises have been carried out to try and secure a pre-let on part of the consented office floorspace, however, all attempts have been unsuccessful. It is understood from the applicant that the reason to the lack of success in securing a tenant and market interest has been due to the Peninsula not being viewed as an office destination at the time, or in the future. This market position has been reflected in the 2015 masterplan which has sought to address the potential over-supply of office capacity in Greenwich by adopting a residential-led approach to the regeneration of the Peninsula and significantly reducing the amount of B1 commercial floorspace granted under the previous masterplan.

20 The 2015 masterplan was supported by an independent strategic office market report to support the revised residential-led approach to the regeneration of Greenwich Peninsula. The

report demonstrated that there is currently a potentially large over supply of office floorspace in Greenwich, Newham and Tower Hamlets. The report concludes that in light of this current over-supply in London, based on the projected demand and capacity figures in the London Office Floorspace Projections 2014 and London Office Policy Review 2012, the reduction in B1 floorspace as part of the 2015 masterplan would reduce the excess in capacity in Greenwich from 591% to 155% which is more comparable with the London-wide ratio (138%). Notwithstanding this, the equivalent calculation for the three east London boroughs would still significantly exceed current demand projections and on this basis the reduction in office floorspace proposed by the 2015 masterplan was accepted by the GLA and the Council.

21 The applicant considers that given that the report was published in February 2015 and reviewed the Peninsula as a whole, the conclusions supports its own findings; that there is no demand for B1 office floorspace on the site as demonstrated by its own marketing exercises. Furthermore, given the potential over-supply of office capacity in Greenwich, the effective loss in consented employment floorspace at this site is unlikely to have a detrimental impact on current forecasts for the demand of office floor space in East London or the capital as a whole and is accepted in this instance.

22 With regards to employment densities, it is accepted that the proposals would not support as many jobs as the consented scheme. As demonstrated by the applicant's own marketing exercises and within the office market report, an office-led scheme is unlikely to be viable in this location and would therefore not deliver the associated number of jobs. The applicant has set out that the retail element of the revised proposals would provide approximately 53 full-time jobs, and a further 790 jobs during the construction process. While this is supported, in order to further contribute towards the strategic employment aspirations of the Opportunity Area, the applicant should look to secure apprenticeships and training initiatives in order to support local employment, skills development and training opportunities in accordance with London Plan Policy 4.12.

Housing

23 The proposals would deliver 395 residential units via the mix illustrated in the table below:

Unit type	Private	Intermediate	Affordable rent	Social rent	Total units
Studio	54	0	0	0	54
One bed	161	13	21	0	195
Two bed	85	12	2	11	110
Three bed	15	8	0	13	36
Total	315	33	23	24	395

Affordable housing

24 On assessment of the above housing schedule, the applicant is proposing that approximately 20% affordable housing will be delivered as part of the scheme, or 25% when considered on a habitable room basis. In response to the requirements of London Plan Policy 3.12, the applicant will be required to demonstrate that this represents the maximum level of affordable housing. As part of this a financial viability assessment and the financial modelling which underpins it should be independently assessed on behalf of the Council, with the results shared in full with GLA officers to verify whether the proposed affordable housing provision would be the maximum reasonable. GLA officers will update the Mayor of the findings of the assessment, and of any further negotiations, at the decision making stage.

Tenure

25 Within the proposed affordable housing, the applicant is proposing a balance of approximately 59% affordable/social rent and 41% intermediate (shared ownership) units. This is broadly compliant with London Plan Policy 3.11, which seeks a strategic tenure split of 60:40 (affordable/social rent:intermediate).

Housing choice

26 London Plan Policy 3.8, together with the Mayor's Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The unit mix indicates that over 90% of the proposed units will be one or two bed, which significantly exceeds the guidance in Policy H2 of the Greenwich Core Strategy. While it is acknowledged that this area of the masterplan (Meridian Quays) is envisaged for a high density mixed-use neighbourhood more suited to higher proportions of one and two bed units, the applicant should demonstrate how this will help meet local housing need and accords with local planning policy requirements.

27 With regards to affordable family housing, the development would deliver a 27% provision of family-sized housing within the affordable component (social rent) of the scheme. GLA officers await the outcome of the Council's independent assessment of the applicant's financial viability assessment before commenting further on this aspect of the scheme.

Residential standards

28 The applicant has provided sample flat layouts which sets out that all units will meet or exceed the Mayor's minimum space standards set out in table 3.3 of London Plan, which is supported. The applicant has provided an assessment of the residential design against the standards set out in the Mayor's Housing SPG and the Draft Interim Housing SPG which reflects the Governments Technical Housing Standards which came into effect on 1 October 2015. This is welcomed. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

29 The applicant has set out that all habitable rooms will have a typical floor to ceiling height of 2.6 metres but that bathrooms, kitchens and circulation spaces will have heights of 2.35 metres. The applicant should provide further clarification for the reason for this decrease in height and that all units will meet the requirements of standards 5.4.1, ie. that a minimum ceiling height for 2.5m for at least 75% of the dwelling area.

30 With the exception of those units facing onto the podium courtyard, the units have not been designed with private outdoor amenity space. The applicant has set out that due to the exposed site location on the Peninsula, the proposed building height and the wind conditions, it was decided that the outdoor amenity space would be internalised and this has been discussed with the Council during pre-application stage. GLA officers welcome information on the outcome of these discussions. In accordance with the supporting text to standard 4.10.1 in the Draft Interim Housing SPG, the applicant has incorporated the outdoor amenity space requirement into the living rooms of each residential unit in addition to the minimum gross internal area required by the Mayor's minimum space standards. While this rationale is recognised by the guidance, it states that this is acceptable in exceptional circumstances where site constraints make it impossible to provide private open space and in these cases a proportion of dwellings may instead provide an internal living space equivalent. Therefore, before this

approach can be fully accepted, given the proposed high density of the scheme and the other residential design concerns raised within this report the applicant is encouraged to explore whether those units that are less exposed can be designed with external balconies.

31 As set out in further detail in the design section below and as raised in the GLA pre-application advice, concerns remain with regards to the number of units per core and the proportion of north facing single aspect units proposed. Furthermore, given the proximity of London City Airport, the applicant should also demonstrate how appropriate noise mitigation has been integrated into the building design to ensure that a high quality living environment will be provided for future residents.

Children's play space

32 Using the methodology in Appendix Two of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), the applicant has calculated an overall expected child yield of the development of 68, of which 31 would be aged under five years old. Based on this, the Mayor's SPG indicates that the development would generate a total play space requirement of 680 sq.m. for play and informal recreation, of which 310 sq.m. should be provided on site as a minimum.

33 The development would provide 364 sq.m. of doorstep play space within the podium courtyard for children under five years old, which meets the SPG requirement and is supported. However, the planning statement provides a figure of 385 sq.m. and the correct figure should be clarified. The applicant has provided some precedent images indicating the nature of the space to be provided which will offer informal playable features such as stepping stones for younger children in small, discretely defined areas linked by wooden decking.

34 With regards to older age groups, the site is within 100 metres from Central Park, which provides a large amount of open space suited to all age groups and will be enlarged under the 2015 masterplan. The masterplan also envisages a new network of public open spaces and small neighbourhood parks to serve the Peninsula's future population. In addition, a new riverside park referred to as Meridian Quays Park is proposed to the south west of the site in addition to the P5k running track which is a five kilometre, partly elevated, sculptural shaped running track with associated public realm interventions that navigates the masterplan site linking the network of public spaces. Notwithstanding this, given the development timescale of the masterplan, the applicant should provide further information on other recreational facilities within 400 metres and 800 metres of the development that would meet the need of older children.

35 Subject to the provision of the above information, from the material provided so far and in the context of the wider landscaping strategy for the 2015 masterplan, GLA officers are content that the proposals would be capable of meeting the requirements set out within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG.

Residential density

36 In considering the characteristics of this site, officers recognise the importance of having regard to the emerging masterplan context, other consented developments on the peninsula and the overall aspirations of Opportunity Area of making a significant contribution towards meeting London's housing need. In this context, given the extent of the 2015 masterplan proposals, the Peninsula will arguably establish its own character, which is more akin to a 'central' area as defined in table 3.2 of London Plan and therefore local context and design will form key factors in considering an appropriate density for this site.

37 In this respect, the guidance in the London Plan density matrix shown in table 3.2 would suggest residential densities of between 215 to 405 units per hectare (u/ha) or 650-1,100

habitable rooms per hectare (hr/ha) for a site that has a public transport accessibility level of six (PTAL) in a 'central' location. In addition to this, it is also important to acknowledge that the site is an identified Opportunity Area and is therefore a location where residential output and densities should be optimised and one where development proposals should contribute towards meeting, or where appropriate, exceeding the minimum guidelines for housing, in accordance with London Plan Policy 2.13.

38 Using the methodology set out within the Mayor's Housing SPG the applicant has calculated the development will have a density of 2,231 habitable rooms per hectare which significantly exceeds the London Plan guidance. It is noted that this figure is almost double that which was quoted at the pre-application stage and GLA officers request further clarification for this increase given the proposals are broadly similar. The applicant has argued that it is reasonable to include Peninsula Square in the density calculation which would reduce the density to 690 hr/ha, however, this is not supported. Notwithstanding this, as set out during pre-application discussions, it is acknowledged that the density ranges recommended in Table 3.2 of the London Plan should not be applied mechanistically and that PTAL alone is not an appropriate measurement to inform residential density. In line with London Plan policy 3.4 other factors such as local context, design, transport capacity, social infrastructure and amenities such as open space and play space should also be taken into consideration when optimising housing potential. Furthermore, the proposed density is similar to the residential densities expected to come forward on the individual plots in the Meridian Quays district of the approved 2015 masterplan proposals which was supported by the Mayor and by the Council in their resolution to grant planning permission for the revised application.

39 However, in order for the very high density nature of the scheme to be acceptable, it would be expected to achieve the highest quality of residential design and the applicant is therefore strongly advised to address the residential quality and design issues set out within this report.

Urban design

40 The proposed development looks to accommodate 395 residential units in a building of 36 storeys in height. As discussed at the pre-application meeting, one of the key principles of the 2015 masterplan is to help increase legibility and wayfinding when navigating the peninsula, which has in part been reinforced by improved views of the O2 from Central Park when compared to the existing masterplan massing. This has been achieved through the proposed enlarged Central Park pushing the western building frontages back, opening views to the north, and by the keeping the scale of the 'design district' which lies to the south of Peninsula Square to no more than five stories. These design principles were strongly supported in the Mayor's initial representations (see GLA planning report ref: D&P/0519q/01).

41 In light of the above, given the site's location at the terminus of this view, any building of scale on it will encroach into the improved views of the O2 and concerns were raised over this impact at the pre-application stage from both the GLA and the Council. The applicant has provided a number of views from The Pilot Inn towards the O2 (View 11 in Greenwich Core Strategy) modelling the effect of the proposed building on the view in the context of the 2015 masterplan massing. While it is acknowledged that the proposed tower will further enclose the open views to the north when compared to the massing of the consented scheme, the dynamic views provided demonstrate that as you move east to west across the park clear views of the O2 stanchions and beyond are still achievable and on balance the impact is accepted. Notwithstanding this, as set out in pre-application advice, the applicant was strongly advised to explore opportunities to slim down the width of the tower to lessen this impact and address other residential design issues; however, it appears that this has not been pursued. This would help further reduce the impact on the views to the north and further increase visual permeability

in accordance with the overarching aspirations of the 2015 masterplan, and GLA officers encourage the applicant to explore this further.

42 At the pre-application stage, the oversized floorplate also raised concerns due to it resulting in a large proportion of units being single aspect, many of them which were north-facing. While the corner units technically have a second aspect, this is narrow, and does not allow for as much cross ventilation and sunlight as a genuine dual aspect unit. The applicant was advised to revisit the residential configuration in order to reduce the proportion of north facing single aspect (NFSA) units as much as possible. The applicant has reconfigured the residential layout in the tower to reduce the number of NFSA units to one unit per floor and this results in 34 NFSA units throughout the scheme (8.5%). While it is regrettable that there it is still a number of these units remaining in the scheme, it is acknowledged that twenty of these units (those above floor twelve) will benefit from a river prospect. In addition, the units are designed with a significant amount of glazing offering a wide view and maximising light penetration which will help mitigate those issues associated with NFSA units. The applicant should confirm that those units below floor twelve, particularly those lower down, will receive adequate daylight and sunlight to habitable rooms, given that their outlook will be less favourable.

43 The triangular floorplate creates three bays of apartments of just under 37 metres in length each. This allows for up to four units on each bay which has resulted in a significant number of floors in the tower (30 floors) exceeding the maximum recommended amount of eight units per core in the Mayor's Housing SPG. This has the potential to undermine future residents' sense of ownership over communal circulation spaces and in turn the overall residential quality of the proposal. However, the triangular design of the core effectively groups the flats on each floor into three small clusters of no more than four, where each arm creates an arrangement where each flat shares a small semi-private lobby area with its immediate neighbours only. The applicant argues that while the floors are shared by more units than prescribed in the guidance, this access arrangement minimises the corridor effect and avoids the issues associated with them. In addition, the tower building will be fully managed with a 24 hour concierge service to ensure a high level of security and that any maintenance issues are quickly resolved. It is also noted that the tower is predominantly one and two bedroom units, thus limiting the intensity of the use of the communal circulation space. In light of the design of the residential core, the management arrangements to be put in place and the architectural constraints imposed on the building, overall, this aspect of the scheme is on balance accepted.

44 With regards to building height, the plots immediately adjacent the applications site to the west and south are prescribed a maximum building height of 113.5 metres AOD, with a cluster of taller buildings of between 123.5 and 133.5 metres just beyond. Therefore, the proposed 120 metres AOD tower element will sit comfortably within the context of other tall buildings in this district. The applicant has also provided a detailed townscape assessment within which provides modelled views from London Panorama 5A.1 Greenwich Park towards Greenwich Palace. The application sits to the far east of the panorama and sits within the cluster of tall buildings prescribed by the 2015 masterplan massing. The proposals will be almost completely screened by the masterplan plots further to west of the Meridian Quays district are not considered to have a negative impact on the protected vista of Greenwich Palace.

45 However, a key element of the London Plan Policy 7.7 regarding tall buildings is how tall buildings address the street. While the podium building is wrapped with retail units which will help animate the surrounding public realm, the ground floor of the tower building will be overly dominated by refuse storage and plant uses, offering little activation to the public realm. The applicant should reconsider this aspect of the scheme with view to minimising dead frontage, particularly as this is a key arrival point to the Peninsula. In addition, it is not clear from the

ground floor plans provided which areas surrounding the base of the tower will be publicly accessible and this should be clarified further.

Inclusive design

46 The development will provide 10% wheelchair accessible housing in accordance with London Plan Policy 3.8 which is welcomed. As set out above, the applicant has also had regard to the quality and design standards set out in the Draft Interim Housing SPG which reflects the new national housing standard requirements which are to be adopted in a Minor Alteration to the London Plan. Sample flat layouts have been provided demonstrating compliance with relevant wheelchair housing design guidance. In order to ensure compliance with the new housing standards, the Council should include a condition to secure the Building Regulation standards M4(2) and M4(3).

47 The applicant has provided an access statement that sets out that all entrances will have level access and where required will be accessed by ramps with a gradient of no more than 1:60. The reception areas, resident's gym and swimming pool area will also be designed to be wheelchair accessible with accessible WC's and changing areas. With regards to the podium courtyard this will be designed to Part M of the Building Regulations as will the retail units at ground floor. This is supported and the Council should ensure these commitments are carried through to the detailed design stages and secured by condition. The applicant should ensure that accessible seating is provided within the podium garden.

48 Notwithstanding the comments below regarding disabled parking in the transport section below, overall, the access statement demonstrates that the proposals appear to have been designed with inclusive design principles in mind and are in general accordance with London Plan Policy 7.2.

Sustainable development

49 The applicant has applied the energy saving hierarchy detailing savings from energy efficiency measures of 13% and savings of 22% through the provision of Combined Heat and Power (CHP). In this case the applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. Overall, the development aims to achieve a 35% reduction in regulated emissions to a 2013 Building Regulations compliant scheme.

Energy efficiency

50 The demand for cooling will be minimised through solar control glazing, fritting, boosted mechanical ventilation and internal shading. The applicant has carried out an overheating assessment and states that all dwellings modelled pass the CIBSE Guide A overheating requirements. The assessment suggests that all flats will have a boosted ventilation rate of 4.5 air changes per hour on hot days and this assumption was included in the overheating assessment. The applicant should provide information on the proposed ventilation system that will allow this air change rate to be achieved and how this will be accommodated within the design. As typical MVHR systems have much lower air change rates, it is expected that such a level of boost would require significant space for ducting.

51 The private apartments will be provided with active cooling. The applicant should confirm that active cooling was not included in the overheating assessment and is therefore not needed to avoid overheating but is provided purely for market reasons. It is recommended that

the applicant also assesses the site's overheating risk against a future climate scenario in line with CIBSE TM49 to ensure that the building is future proofed.

52 Sample DER and TER sheets (not SAP input sheets) and BRUKL sheets including efficiency measures alone (i.e. excluding district heating connection) should be provided to support the savings claimed under the first tier of the energy hierarchy.

District heating

53 The applicant has identified that the Greenwich Peninsula district heating network is within the vicinity of the development and is proposing to connect to the network. This is strongly supported and connection to the network should continue to be prioritised and evidence of correspondence with the network operator should be provided.

54 The applicant should confirm that all apartments and non-domestic building uses will be connected to the heat network and a drawing showing the route of the heat network linking all buildings on the site should be provided. Information should also be provided (supported by a plan) on the size and location of the connection point to the district heating network.

55 The calculation used to determine the savings from this element of the scheme should be provided to support the savings claimed, including the total heat demand to be met by the network.

56 In summary, the carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the information requested above should be provided before the carbon savings can be verified.

Flood risk

57 The supporting Flood Risk Assessment confirms that whilst the majority of the site is within Flood Zone 3a, it is protected to a high degree by the existing Thames Tidal Flood Defences and these provide protection up to a 1 in 1000 year standard. It also confirms that the site is outside the modelled breach event. There is a risk of relatively shallow surface water flooding, however, there is no residential accommodation at ground floor level and a number of potential mitigation measures are suggested which are in line with London Plan Policy 5.12.

58 It is understood that surface water will be discharged into the existing network with tanked attenuation. Whilst this approach is acceptable in principle, previous planning applications for development in this area of the Peninsula have stated that the new surface water system discharges directly into the Thames. In such a case attenuation is not required by London Plan Policy 5.13 and is only needed to allow for any situations in which the discharge may be reduced by the outfall being tide locked. The applicant is therefore asked to confirm the discharged point of the surface water system and whether the proposed volume of attenuation is required.

Transport

Car and cycle parking

59 The development is car free which is supported. As a result, the number of disabled bays is limited and below the one space per unit requirement that would be sought under the lifetime homes policy. It is therefore recommended that the allocation of these bays must be actively managed to ensure that they are always available to those in greatest need. The parking bays

should be designed so that one in five spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.

60 Based on the breakdown of the proposed residential units, the total number of onsite cycle parking spaces (432) is eight cycle parking spaces below that which is required by London Plan Policy 6.9. No cycle parking is shown on the drawings for visitors or for the commercial units. However, there is mention in the transport assessment for the provision of long stay cycle parking being provided near to or adjacent to the site as necessary and provision for staff cycle parking and lockers available in the O2 Arena, however, no specific details are provided. The applicant should therefore look to provide this additional cycle parking to meet the London Plan policy requirements.

Impact on the public transport network and travel planning

61 Overall the demand breakdown in the transport assessment for the principal mode (Jubilee Line) is considered to be reasonable with 61% using London Underground as the initial mode of travel. There will however, be a greater impact on line demand than allowed for in the transport assessment as the observed directional split at North Greenwich (82%) is heavily biased towards Central London. The recent strategic modelling for the 2015 Masterplan recognised that the Jubilee Line is under increasing pressure from this and other development which is being brought forward in East London. In response it was recognised there needs to be a greater resilience and a range of alternatives to the Jubilee Line which should be promoted through travel planning measures. The travel plan submitted with the application speaks about monitoring but only when a baseline has been established once the development has been occupied. However, arguably, this will be too late as travel patterns are established from early occupancy and are often difficult to change. The transport assessment mode splits should be used as a starting point and promote other travel options other than the Jubilee Line, including walking, cycling, buses, the Emirates Airline and River Services all of which should be promoted from the outset to encourage the use of these alternatives.

62 While it is positive that River Services are mentioned in the travel plan transport assessment, they do not feature in the residential trip generation assessment and this should be revisited. Having noted that the pier is only a short walk away one would have anticipated a greater number of trips using River Services than motorcycle (which is included) in relation to this development. Furthermore, depending on what the revised residential trip generation assessment shows it may be necessary to consider funding towards improvements to the existing pier.

Construction Management Delivery and Servicing and Freight

63 A “high level” construction management plan has been submitted with the application. It is noted that the proposed construction period of 2016 to 2018 is likely to overlap both with Knight Dragon’s construction timetable on the Peninsula as well as potentially the Silvertown Tunnel construction from 2018 onwards. Transport for London (TfL) would therefore recommend that an open dialogue on construction logistics is maintained to ensure coordination of these developments on site.

64 London Plan Policy 6.14 promotes the Fleet Operators Recognition Scheme (FORS) for construction logistics plans and delivery and servicing plans to look to more innovative freight solutions in line with the London Freight Plan. These should be co-ordinated with travel plans. TfL would also wish to see opportunities to the use the Thames particularly for any construction logistics. Similarly a consolidation centre for the Peninsula was promoted as part of the 2015 masterplan and there should be opportunities to integrate any opportunities, such as a “break

bulk” facility with this proposal. Any construction management and or future delivery and service plans should be secured either by condition or legal agreement.

Build Over Agreements

65 Given the proximity of TfL and London Underground infrastructure to the development the applicant will be required to enter into a “build over agreement” with TfL prior to works commencing. This requirement should be secured either through a pre-commencement condition or associated section 106 agreement.

Planning obligations

66 As set out above, this application was not included in the 2015 Masterplan application site boundary and as such does not propose any site specific mitigation despite placing extra demands on the public transport network. At the time of the pre-application discussions an offer was made by the applicant to make a commitment toward supporting river services. This should form part of the submission and secured through the section 106 agreement.

Community Infrastructure Levy

67 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor’s CIL will contribute towards the funding of Crossrail

68 The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £35/sq.m. The required CIL should be confirmed by the applicant and Council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/ukdsi/2011/987/made>

69 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor’s CIL. Greenwich Council adopted a scheme on 25 March 2015. See the Council’s website for more details.

Local planning authority’s position

70 At the time of writing the local planning authority’s position is unknown.

Legal considerations

71 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

72 There are no financial considerations at this stage.

Conclusion

73 London Plan policies on Opportunity Areas, tall buildings, housing, affordable housing, play space, urban design, inclusive design, sustainable development, flood risk and transport are relevant to this application. The application complies with some of these policies but not with others and on balance does not comply with the London Plan. However, the possible remedies set out in this report could address these deficiencies.

- **Principle of development:** In context of the recently approved 2015 Greenwich Peninsula Masterplan, the proposed residential-led, mixed-use development is supported in strategic policy terms and is in accordance with the aspirations of the Opportunity Area.
- **Housing & affordable housing:** The proposed tenure split of the affordable housing is broadly compliant with London Plan policy, however, officers await the outcome of the Council's independent assessment of the submitted financial viability information before providing further comment on the overall quantum. The applicant should provide further information on how the proposed unit mix helps meet local housing need and accords with local planning policy requirements.
- **Residential standards:** In accordance with the detailed comments above, the applicant should provide further clarification on the floor to ceiling heights and explore whether less exposed units can accommodate private balconies.
- **Children's play space:** The proposed play strategy is generally supported, however, the applicant should provide further information on other recreational facilities within 400 and 800 metres that would meet the recreational needs of older children.
- **Density:** The proposed density significantly exceeds London Plan guidance, however, this does not raise an objection in principle given the site is within an Opportunity Area and the proposed density is similar to the residential densities expected to come forward on nearby masterplan plots. However, in order for the very high density nature of the scheme to be acceptable, it would be expected to achieve the highest quality of residential design and the applicant is strongly advised to address the residential quality and design issues set out within this report.
- **Urban design:** The proposed height of the scheme is consistent with the maximum building heights considered appropriate in this area by the approved 2015 masterplan and will not have any further impact on the London Panorama 5A.1 and those issues raised at the pre-application stage regarding views of the O2 Arena from Central Park have been satisfactorily addressed. However, the applicant is encouraged to explore opportunities to further slim down the tower to lessen the impact of views on the O2. Further information on the daylight levels received by those north facing single aspect units below floor twelve should be provided and the applicant should address those issues regarding ground floor access and activation.
- **Inclusive design:** From the material provided the proposals appear to be in general accordance with London Plan 7.2. The Council should secure compliance with Building Regulations M4(2) and M4(3).

- **Sustainable development:** The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan; however, further information is sought regarding energy efficiency, overheating, mechanical ventilation, district heating and the site heat network before compliance with London Plan energy policy can be verified.
- **Flood risk:** The flood risk mitigation is in accordance with London Plan Policy 5.12. The applicant should confirm the discharged point of the surface water system and whether the proposed volume of attenuation is required.
- **Transport:** Further discussion, clarification and/or commitments are required to address those issues set out above regarding blue badge parking, electric vehicle charging points, cycle parking, travel planning and impact on Jubilee Line, River Services, construction management, delivery and servicing, build over agreements and site specific mitigation.

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