1. **Decision Required**

1.1 The Planning Board is requested to agree the recommendations set out in Section 3 of the report in respect of planning application Ref: 15/0716/O for outline planning permission with all matters reserved for the demolition of buildings and mixed use redevelopment comprising Class C3 (dwellings) use up to 12,678 residential dwellings (or up to 1,171,909 sq.m) and up to 220 serviced apartments (or up to 20,306 sq.m); Class A1-A5 use (food and non-food retail, restaurants, bars and cafes) up to 23,475sq.m; Class B1(a)(b)(c) (business) up to 59,744sqm; Class C1 (hotel) up to 35,999sqm for up to 500 rooms; Class D1 (education facilities) up to 37,900sqm; Class D1 (health care facilities) up to 1,462sqm; Class D1/D2 (visitor attraction) up to 19,526sqm; sui generis use for Film and media studios up to 38,693sqm; residential and non-residential car parking as well as up to 2000 AEG parking spaces (for the O2); cycle parking; associated community facilities; public realm and open space; hard and soft landscaping; a new transport hub and associated facilities; works to the river wall; a ferry jetty terminal; a 5 km running track traversing the entire site (P5K running track); highway and transport works, including amendments to the Thames Footpath and Cyclepath; and, associated ancillary works (Proposals to revise part of the site of the 2004 approved Greenwich Peninsula Masterplan).

2. **Summary**

2.1 This report considers the proposal to to revisit the 2004 Greenwich Peninsula Masterplan consent and come forward with a new outline Masterplan application that would significantly increase the total number of residential units to be delivered as part of the mixed-use regeneration of the peninsula to approximately 15,720 units.

2.2 The revised masterplan for Greenwich Peninsula comprises a large scale, mixed-use development including 12,678 new homes, open space, leisure development, film studios, a new transport hub, office use, retail use and community use. The proposals are driven by a vision to create new
neighbourhoods with individual characters for residents to live, work and play that are complemented by high quality landscaping and public realm; to provide mixed-use development that contributes to the streetscape; provide a wide range of jobs; a new and improved transport interchange; provide new social infrastructure facilities to support a new residential community and to improve connectivity to the wider Greenwich area.

2.3 The application has been the subject of two extensive public consultations comprising a press notice, site notices and 7,900 letters sent to individual occupiers in the vicinity of the development. The full response to public consultation is set out in the report.

2.6 The report details all relevant national, regional and local policy implications of the scheme, including supplementary planning guidance.

2.7 The Health and Safety Executive has advised that there are sufficient public safety grounds for permission to be refused for the location of a school on Parcel 18 of the development. The recommended Grampian Condition has been included in the recommendation. On this basis officers recommend that Members should approve the application. If the application is approved, it will need to be referred back to the HSE for a decision can be issued.

2.7 The application is considered acceptable and is recommended for approval subject to referral to the Mayor of London, referral to the Health and Safety Executive, the satisfactory completion of a Legal Agreement and conditions set out in section 3.2 of the report.

3. Recommendation

3.1 The Board is requested to grant Outline Planning Permission with all matters reserved (Ref: 15/0716/O) for the demolition of buildings and mixed use redevelopment comprising Class C3 (dwellings) use up to 12,678 residential dwellings (or up to 1,171,909 sq.m) and up to 220 serviced apartments (or up to 20,306 sq.m); Class A1-A5 use (food and non-food retail, restaurants, bars and cafes) up to 23,475sq.m; Class B1(a)(b)(c) (business) up to 59,744sqm; Class C1 (hotel) up to 35,999sqm for up to 500 rooms; Class D1 (education facilities) up to 37,900sqm; Class D1 (health care facilities) up to 1,462sqm; Class D1/D2 (visitor attraction) up to 19,526sqm; sui generis use for Film and media studios up to 38,693sqm; residential and non-residential car parking as well as up to 2000 AEG parking spaces (for the O2); cycle parking; associated community facilities; public realm and open space; hard and soft landscaping; a new transport hub and associated facilities; works to the river wall; a ferry jetty terminal; a 5 km running track traversing the entire site (P5K running
track); highway and transport works, including amendments to the Thames Footpath and Cyclepath; and, associated ancillary works (Proposals to revise part of the site of the 2004 approved Greenwich Peninsula Masterplan)., subject to:

a. Referral of the application to the Mayor of London as required under the terms of The Town and Country Planning (Mayor of London) Order 2008.

b. Referral of the application to the Health and Safety Executive as required under paragraph 072 of the Hazardous Substances section of the Communities and Local Government's Planning Practice Guidance.

c. The satisfactory completion of a legal agreement to secure the planning obligation set out in Section 47 of the report;

d. Conditions and informatives set out in Section 3.2 and 3.3 below;

e. Members confirming in their decision that account has been taken of environmental information, as required by Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011; and

f. A statement being placed on the statutory Register confirming the main reasons and consideration of which the Planning Board decision was based were those set out in the report of the Director of Regeneration, Enterprise and Skills as required by Regulations 24 (I) (c.) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

3.2 Conditions and Reasons for Application Reference 15/0716/O

Lifetime of the Permission

01. Applications for approval of all reserved matters pursuant to condition 13 must be made not later than the expiration of 20 years from the date of this permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990. A period of 20 years is considered to be a reasonable time limit in view of the extent and timescale of the proposal.
**Lifetime of the Permission**

02. Development of a plot must be begun before the expiration of [two] years from the final approval of reserved matters for that plot.

*Reason: To comply with Section 92 of the Town and Country Planning Act 1990.*

**Approved Drawings**

03. All development zone masterplans and reserved matters applications shall comply with the following approved Parameter Plans:

- Application Site Boundary 07-070 Revision P00
- Demolition Plan 07-071 Revision P01
- Development Zones 07-072 Revision P02
- Ground Level Land Use Plan 07-074 Revision P01
- Upper Level Use Plan 07-075 Revision P01
- Public Realm 07-076 Revision P01
- Access and Circulation Routes 07-077 Revision P01
- Maximum Building Heights 07-078 Revision P01

*Reason: For the avoidance of doubt and in the interests of proper planning.*

**Compliance with Development Specification**

04. All development zone masterplans and reserved matters applications shall comply with the approved Development Specification.

*Reason: In order to ensure the highest quality redevelopment of the site based on specific design guidelines and that each phase of development demonstrates broad compliance with such approved guidelines and to ensure compliance with policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

**Control Parameters**

05. Subject to condition 7 below, the development hereby permitted shall not exceed the following amounts:
<table>
<thead>
<tr>
<th>Development</th>
<th>Use Class</th>
<th>Maximum Floor Space Proposed (GEA) sqm</th>
<th>or</th>
<th>No. of units/rooms proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>C3</td>
<td>Up to 1,171,909</td>
<td></td>
<td>Up to 12,678 units</td>
</tr>
<tr>
<td>Employment</td>
<td>B1</td>
<td>Up to 59,744</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Retail</td>
<td>A1-A5</td>
<td>Up to 23,475</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Hotel</td>
<td>C1</td>
<td>Up to 35,999</td>
<td></td>
<td>Up to 500 rooms</td>
</tr>
<tr>
<td>Serviced Apartments</td>
<td>C3</td>
<td>Up to 20,306</td>
<td></td>
<td>Up to 220 units</td>
</tr>
<tr>
<td>Visitor Attraction</td>
<td>D1/D2</td>
<td>Up to 19,526</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Film Studios</td>
<td>Sui Generi s</td>
<td>Up to 38,693</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Education</td>
<td>D1</td>
<td>Up to 37,900</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Health Care Facilities</td>
<td>D1</td>
<td>Up to 1,462</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>AEG Parking</td>
<td>Sui Generi s</td>
<td>Up to 68,297</td>
<td></td>
<td>Up to 2150 parking spaces</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>N/A</td>
<td>Up to 1,477,311</td>
<td></td>
<td>• Up to 2150 parking spaces</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Up to 12,678 residential</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>units</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Up to 500 hotel rooms</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Up to 220 Serviced</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Apartments</td>
</tr>
</tbody>
</table>

**Reason:** The development of the site is subject of an Environmental Impact Assessment any alterations to the layout may have an impact, which has not been assessed by that process.

**Control Parameters**

06. Subject to condition 7 below, the quantum of development set out in condition 5 above shall be divided between the development zones in accordance with the following table:
<table>
<thead>
<tr>
<th>Proposed Use</th>
<th>GEA Sqm or No. units/rooms</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Residential (Use Class C3)</strong></td>
<td><strong>A</strong></td>
</tr>
<tr>
<td>Up to 467,232 or 5,055 units</td>
<td>Up to 106,500 or 1,152 units</td>
</tr>
<tr>
<td><strong>Employment (Use Class B1)</strong></td>
<td>Up to 46,563</td>
</tr>
<tr>
<td><strong>Retail (Use Class A1-A5)</strong></td>
<td>Up to 21,574</td>
</tr>
<tr>
<td><strong>Hotel (Use Class C1)</strong></td>
<td>Up to 35,999 or 500 rooms</td>
</tr>
<tr>
<td><strong>Serviced Apartments (Use Class C3)</strong></td>
<td>Up to 20,306 or 220 units</td>
</tr>
<tr>
<td><strong>Visitor Attraction (Use Class D1/D2)</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Film Studios (Sui-Generis)</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Education (Use Class D1 Use)</strong></td>
<td>Up to 4,189</td>
</tr>
<tr>
<td><strong>Health Facilities (Use Class D1)</strong></td>
<td>Up to 1,462</td>
</tr>
<tr>
<td><strong>AEG Car Parking</strong></td>
<td>Up to 68,297</td>
</tr>
<tr>
<td><strong>TOTAL FLOORSPACE APPLIED</strong></td>
<td>Up to 665,622</td>
</tr>
</tbody>
</table>

**Reason:** The development of the site is subject of an Environmental Impact Assessment any alterations to the layout may have an impact, which has not been assessed by that process.
Control Parameters

07. All:
- Development zone masterplans (submitted pursuant to condition 11 below),
- reserved matters applications, and
- any application for approval pursuant to or under this permission which indicates deviation from the figures set out in conditions 5 and 6 above, or deviation from the Parameter Plans or Development Specification set out in condition 3 and 4 above,
either:
(a) if it is demonstrated that that application or approval is not likely to give rise to any additional significant environmental effects in comparison with the Development as approved by this Permission and reported in the Environmental Statement, shall not be required to be accompanied by a further environmental statement; or
(b) where any such application or approval would be likely to have significant environmental effects, as screened and agreed by the Council prior to the submission of any such application, that application will be accompanied by an assessment of the likely significant effects of the details applied for.

Reason: The development of the site is subject of an Environmental Impact Assessment any alterations to the layout may have an impact, which has not been assessed by that process.

Control Parameters

08. The development shall be carried out in accordance with the Design Guidelines and all development zone masterplan submissions and reserved matters applications shall demonstrate compliance with the Design Guidelines.

Reason: In order to ensure the highest quality redevelopment of the site based on specific design guidelines and that each phase of development demonstrates broad compliance with such approved guidelines and to ensure compliance with policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
Compliance with the EIA Mitigation Measures

09. The development shall be carried out in accordance with the mitigation measures set out in the Environmental Statement and whenever the local planning authority is requested to approve a variation to those mitigation measures or a non-material or minor amendment as provided by planning procedures, it shall only do so if it is satisfied that the proposed variation or amendment would not have any significant environmental effects which have not been assessed in the Environmental Statement.

Reason: To ensure that the details of the development are within the parameters assessed in the Environmental Statement and that the development is carried out in accordance with the mitigation measures set out in the Environmental Statement in order to minimise the environmental effects of the development.

Phasing

10. Details of the phasing of the development shall be submitted to and approved by the Local Planning Authority prior to the commencement of development and the development shall be carried out in accordance with such approved details.

Reason: The Local Planning Authority need to be satisfied that the development of the site is undertaken in a coherent and comprehensive manner, and is developed within a reasonable time-scale for the benefit of future occupiers and other residents of the area and to ensure compliance with policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Development Masterplans

11. Prior to any application being approved for reserved matters within a development zone (as identified on parameter plan 07-072 Revision P02), a development zone masterplan for that zone shall be submitted to and approved by the Local Planning Authority.

Reason: In order that the Council is satisfied with the details of the proposed development and to ensure compliance with policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Development Masterplans

12. The development zone masterplans submitted pursuant to condition 11 shall set out and address as a minimum all items listed within the

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development zone masterplan specification attached to this decision at Schedule [2].

Reason: In order that the Council is satisfied with the details of the proposed development and to ensure compliance with policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Reserved Matters Applications

13. The relevant part of the development shall not commence until detailed plans/sections and elevations showing the following details in respect of the relevant parts of the development have been submitted to, and approved by, the Local Planning Authority and the relevant part of the development shall in all respects be carried out in accordance with the approved plans:

(a) Appearance;
(b) Layout;
(c) Scale;
(d) Landscaping; and
(e) Access.

Reason: In order that the Council is satisfied with the details of the proposed development and to ensure compliance with policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Reserved Matters Applications

14. Reserved matters applications shall be in compliance with the development zone masterplan submitted to the council pursuant to condition 11 above, and in compliance with the council’s approval of that zonal masterplan.

Information to accompany Reserved Matters and Zonal Masterplan applications:

All Zonal Masterplan and Reserved matters submissions shall include summary tables to provide the following information on detailed consents that have been granted up to the time of the submission:

- The amount of affordable housing that has approved and implemented;
- The overall mix of units that has been approved;
- The breakdown of the children’s playspace that has been approved;
• The amount of residential units and or floorspace of each of the uses that has been granted detailed consent within in each zone;
• The number of residential units approved in each neighbourhood;
• The net residential site area that has been approved in each neighbourhood;
• The number on-street car parking spaces approved;

Reason: In order that the Council is satisfied with the details of the proposed development and to ensure compliance with policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Provision of Affordable Housing

15.

i.) The development hereby approved shall provide a minimum of 22.7% Affordable Housing across the site.

ii.) The Affordable Housing will be provided across the site and in each Neighbourhood as 70% Affordable Housing Rental Units let at Target Rent and 30% Affordable Housing Intermediate Units [by unit]

iii.) Each Neighbourhood will contain a minimum amount of Affordable Housing as set out below:

<table>
<thead>
<tr>
<th>Neighbourhood Area</th>
<th>Total</th>
<th>Min</th>
<th>Min %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brickfields North</td>
<td>1,152</td>
<td>230</td>
<td>20%</td>
</tr>
<tr>
<td>Brickfields South</td>
<td>1,608</td>
<td>400</td>
<td>25%</td>
</tr>
<tr>
<td>Lower Riverside</td>
<td>2,607</td>
<td>520</td>
<td>20%</td>
</tr>
<tr>
<td>Meridian Quays*</td>
<td>5,850</td>
<td>850</td>
<td>15%</td>
</tr>
<tr>
<td>Peninsula Central</td>
<td>1,680</td>
<td>335</td>
<td>20%</td>
</tr>
<tr>
<td><strong>Sub Total</strong></td>
<td><strong>12,897</strong></td>
<td><strong>2,335</strong></td>
<td><strong>18.1%</strong></td>
</tr>
<tr>
<td>Balance to be distributed across each of the neighbourhoods</td>
<td>-</td>
<td>593</td>
<td>4.6%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>12,897</strong></td>
<td><strong>2,928</strong></td>
<td><strong>22.7%</strong></td>
</tr>
</tbody>
</table>

* Plots 1.01, 1.02, 1.03, 2.01, 2.02 and 2.03 will not provide any affordable housing
Reason: In the interest of providing an appropriate level of affordable housing across the site and each neighbourhood and development zone, ensuring compliance with policies 3.4 and 3.12 of the London Plan (March 2015) and H3 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Housing Mix**

16. The housing mix provided within each development zone shall be as follows:

- **Studios:** 0-20%, provided that there shall be a maximum of 15% studios overall across the development
- **1 bed units:** 25-50%
- **2 bed units:** 20-40%
- **3+ bed units:** 5-30%, provided that there shall be a minimum of 20% 3+ bed units overall across the development

Reason: To ensure there is a mix and size of dwellings to meet the future needs of households and ensure compliance with policy 3.8 of the London Plan (March 2015) and H2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Density**

17. The development in the residential Neighbourhoods shall comply with the following Residential Net Densities provided that the overall net density for the development shall not exceed 353 dwelling units per hectare.

- **Meridian Quays:** 507 u/ha
- **Peninsula Central:** 299 u/ha
- **Lower Riverside:** 320 u/ha
- **Brickfields North:** 300 u/ha
- **Brickfields South:** 218 u/ha

Reason: In the interest of providing a good living environment for future residents and to ensure compliance with 3.5 of the London Plan (March 2015) and H5 and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Retail Restrictions**

18. Full details of the retail/commercial, D1 and D2 floorspace including sizes of units and use class (i.e. Use Classes A1, A2, A3, A4, A5, D1 and D2) shall be submitted to, and approved by, the Local Planning Authority prior.
to the occupation of the relevant part of the development. The development shall thereafter be implemented in strict accordance with the approved details and the units (Use Classes A1, A2, A3, A4, A5, D1 and D2) shall not be amalgamated, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** In order to safeguard the vitality and viability of town centres, to provide a mix of sustainable retail uses and to safeguard the amenities of neighbouring properties, particularly residential properties and the area generally and to ensure compliance with Policies 4.7 and 4.8 of the London Plan (March 2015) and Policy TC1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**D1 Uses**

19. Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) and the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (or any orders revoking, re-enacting or modifying these Orders), the D1 use hereby approved shall be restricted so as not to include the use of any part of the relevant unit or units as a Place of Worship.

**Reason:** In order to safeguard the amenities of neighbouring properties and the area generally and ensure compliance with Policy 7.15 of the London Plan (March 2015) and Policy E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**A1/A2/A3/A4/A5 Uses**

20. Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) and the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (or any orders revoking, re-enacting or modifying these Orders), none of the A2, A3, A4 or A5 uses hereby approved shall be permitted to be used as a betting office.

**Reason:** In order to safeguard the vitality and viability of town centres, to provide a mix of sustainable retail uses and to safeguard the amenities of neighbouring properties, particularly residential properties and the area generally and to ensure compliance with Policies 4.7 and 4.8 of the London Plan (March 2015) and Policy TC1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
**B1 Uses**

21. Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) and the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (or any orders revoking, re-enacting or modifying these Orders), none of the B1 allocated uses hereby approved shall be permitted to be used as any other use class.

*Reason: In order to safeguard the loss of employment space, provide a mix of sustainable uses and to safeguard the amenities of neighbouring properties and the area generally and to ensure compliance with policy 4.2 of the London Plan (March 2015) and Policy EA1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

**Facing Materials**

22. Full details, including samples of facing materials to be used on buildings and structures and all other finishing materials including paving, roads, parking areas, means of enclosure, shall be submitted to, and approved by, the Local Planning Authority before the relevant part of the development is commenced. The scheme shall thereafter be implemented in accordance with the approved details.

*Reason: In order that the Local Planning Authority may be satisfied with the external appearance of the buildings and the development and ensure compliance with Policies 3.5 and 7.6 of the London Plan (March 2015) and H5 and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

**Demolition and Construction Method Statement**

23. Prior to the commencement of any demolition and construction works on each relevant part of the development a demolition/construction method statement shall be submitted to and approved in writing by the Local Planning Authority. The method statement should include, as relevant, full details of the following:

- Hours of work;
- Haulage routes including use of the river;
- Loading and unloading areas
- Waste disposal of construction waste and demolition material
- A demolition or refurbishment asbestos survey
- Likely noise levels to be generated from plant;
• Details of any noise screening measures;
• Proposals for monitoring of noise and procedures to be put in place where agreed noise levels are exceeded;
• Proposals for monitoring, reporting and mitigation of vibration levels at surrounding residential properties where they are likely to exceed 1 mm/s measures peak particle velocity.
• Likely dust levels to be generated and any screening measures to be employed;
• Proposals for monitoring dust and controlling unacceptable releases;
• Wheel washing facilities and facilities for discharging the water;
• Identification of the roles and responsibilities with regard to managing and reporting on the construction phase sustainability measures and protection of any existing wildlife.
• Full details of the works and construction in relation to the Blackwall Tunnel (relevant phase(s) only).

Reference shall be made to:
• The Councils’ Construction Site Noise Code of Practice http://www.royalgreenwich.gov.uk/downloads/417/pollution_control_-_construction_information_and_advice
• The Mayor of London’s ‘The control of dust and emissions from construction and demolition’ Best Practice Guidance http://www.london.gov.uk/thelondonplan/guides/bpg/bpg_04.jsp and
• BRE four part Pollution Control Guides ‘Controlling particles and noise pollution from construction sites’

The details of the demolition/construction method Statement shall be strictly adhered to.

Reason: To safeguard the amenities of neighbouring properties and the area generally and ensure compliance with E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Construction Logistics Plan

24. The demolition and construction of the development hereby approved shall not be commenced until a detailed Construction Logistics Plan (CLP) has been submitted to, and approved in writing by, the Local Planning Authority in consultation with Transport for London. The CLP shall include measures to dissuade construction workers from parking in the vicinity of the development. The development shall in all respects be
implemented in accordance with the details approved pursuant to this condition.

Reason: In order to safeguard residential amenity and pedestrian and traffic safety and ensure compliance with Policy 6.3 of the London Plan (2011) and Policies E(c) and IM4 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014).

Reason: In order to safeguard residential amenity and pedestrian and traffic safety and ensure compliance with Policy 6.3 of the London Plan (March 2015) and IM3 and E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Hours of demolition and construction

25. The demolition, earth removal, piling work and any mechanical building operations required to implement this development shall only be carried out between the hours of:

   Monday to Friday    8.00 a.m. - 6.00 p.m.
   Saturdays           8.00 a.m. - 1.00 p.m.

   And not at all on Sundays and Public and Bank Holidays.

Reason: To safeguard the amenities of neighbouring properties and the area generally and ensure compliance with Policy E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Wheel Washing

26. During construction of the development no vehicles shall leave the site with earth, mud etc., adhering to the wheels in a quantity which may result in its being deposited on the public highway or footpath, and creating nuisance, or hazard to vehicles, or pedestrians. Suitable wheel washing equipment to avoid such problems shall be installed, operated and maintained on the site until the development is completed.

Reason: In order to maintain the safety and amenity of users of surrounding roads and footways and ensure compliance with Policy 6.3 of the London Plan (March 2015) and Policy E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
**Foundation Design**

27. Prior to the commencement of the relevant part of the development, full details of foundation design including a method statement for each relevant part shall be submitted to and approved in writing by the Local Planning Authority. The relevant part of development shall take place in strict accordance with details approved pursuant to this condition.

*Reason: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwater. The EA recommends that where soil contamination is present a risk assessment is carried out as per our guidance 'Piling into Contaminated Sites', and we will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters. To comply with E(e) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).*

**Impact Piling**

28. No impact piling shall take place until a piling method statement for the corresponding part of the development (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

*Reason: The proposed works will be in close proximity to underground water and sewerage utility infrastructure. Piling has the potential to impact on local underground water and sewerage utility infrastructure. To minimise disturbance of any existing contamination and the protection of groundwater in the underlying Principal and Secondary Aquifers. To ensure compliance with Policy 5.21 of the London Plan (March 2015) and Policy E(e) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

**Use of the River**

29. Prior to the commencement of the relevant part of development the applicant shall investigate the use of the river for the transportation of construction materials to and waste from the site and shall submit a strategy to maximise the use of the River for the transportation of...
construction materials and waste to and from the site during the construction of the development to the Local Planning Authority for approval.

Reason: In order to promote the sustainable use of the river and ensure compliance with policy 7.26 of the London Plan (March 2015) and M7 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Flood Defence Buffer Zone

30. 'Under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency shall be obtained for any works in, over, under or within 16 metres landward of a main tidal river flood defence structure'.

The relevant Zonal Masterplans shall include demonstrate that a 16m Buffer Zone alongside the watercourse shall be established. The siting of all buildings shall be at least 16m landward of the tidal flood defences and under the Water Resources Act 1991 and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency shall be obtained for any works in, over, under or within 16 metres landward of a main tidal river flood defence structure.

Reason: To safeguard access to the flood defences and the ecology and character of the River Thames. The set back is in order to avoid prejudicing flood defence interests.

Flood Risk Assessment

31. The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment dated March 2015 (FRA) and FRA Addendum Note dated 4 August 2015, or any subsequent Flood Risk documents approved by the LPA, prepared by Arup.

Reason: To prevent flooding by ensuring the satisfactory storage of disposal of surface water from the site, to ensure safe access and egress from and to the site and to reduce the risk of flooding to the proposed development and future occupants, in accordance with Policy E2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
**Flood Evacuation Plan**

32. Prior to the first occupation of the relevant part of the development an evacuation plan covering flood evacuation and escape routes, signage within and outside buildings, shall be submitted to and approved in writing by the Local Planning Authority.

**Reason:** To minimise risks the risk of flooding to users of the building and comply with Policy 5.12 of the London Plan (March 2015) and E2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Surface Water Drainage**

33. Prior to the commencement of any above ground works within the relevant part of the development a surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

The scheme shall include:
- no flooding affecting buildings or overland the surface water flow during run-off generated up to and including the 1 in 100-year plus climate change critical duration storm
- How the scheme will maximise drainage to the River Thames by gravity
- Evidence to show how attenuation to the Thames Water sewer network will work with higher flows
- A scour assessment where any additional outfalls to the River Thames are required.
- Surface Water management Controls require to meet the needs of the Environmental Method Statement Volumes 1 and 2 (including any necessary legislative amendments or updates) approved by the Local Planning Authority under planning application Ref. 04/3245/SD on 23 February 2005 for the Greenwich Masterplan site
- Prioritisation of the management of surface water within the Peninsula Masterplan site
- Exceedance routes – Likely locations and how it will be ensured that they don’t interfere with escape routes

**Reason:** To reduce the impact of flooding both to and from the proposed development and third parties.
Meridian Quays Jetty

34. The relevant reserved matters submissions shall include details of the siting and design of the new Meridian Quays jetty. Such submissions shall include, inter alia, details of access to the foreshore, consideration of the ecological impacts during construction and operation including, where necessary, a hydraulic study of flow patterns, erosion and deposition and mitigation measures and shall demonstrate how the jetty has been designed to minimise the footprint in the River Thames and prevent scour of the foreshore. Any approved development shall be carried out in accordance with the approved details between the months of October to April inclusive.

Reason: To protect and conserve the natural features of importance within or adjoining the watercourse.

Drainage strategy

35. No above ground works within the relevant part of the development shall commence until a drainage strategy detailing any on and/or off-site drainage works, has been submitted to, and approved by, the Local Planning Authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

Reason: The development may lead to sewage flooding. To ensure that sufficient capacity is made available to cope with the new development and in order to avoid adverse environmental impact upon the community.

Water Infrastructure

36. The relevant part of the development shall not be commenced until impact studies of the existing water supply infrastructure for the relevant part of the development have been submitted to, and approved in writing by, the Local Planning Authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand.
**Waste Water**

37. Development within each Zonal Masterplan shall not commence until a drainage strategy detailing any on and/or off site drainage works, for the corresponding Zonal Masterplan, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from each Zonal Masterplan shall be accepted into the public system until the drainage works referred to in the strategy have been completed or approval to do so have been reached with the sewerage undertaker. For each Zonal masterplan the drainage works shall be completed in accordance with the approved strategy.

*Reason:* *The development may lead to sewage flooding. To ensure that sufficient capacity is made available to cope with the new development and in order to avoid adverse environmental impact upon the community.*

**Water**

38. Development within each Zonal Masterplan shall not commence until:

Impact studies for the corresponding Zonal Masterplan, of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point associated with the corresponding Zonal Masterplan.

*Reason:* *To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand.*

**Flood Defence Plan**

39. Prior to the commencement of any above ground works within the relevant part of the development, a flood defence plan outlining the strategy to raise the river walls and/or the site levels to achieve the minimum defence level required by EA shall be submitted to and approved by the Local Planning Authority. The strategy should include provision for future increases of the flood defence height to take into account the EA projected rises in maximum water levels up to and including year 2100.

*Reason:* *To reduce the risk of flooding to the proposed development and future occupants and to ensure compliance with policy 5.12 of the London Plan (March 2015) and policy E2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*
40. Any works to the river walls shall include details of how the proposed works to the river wall will contribute to biodiversity, including consideration of the provision of reedbeds / vertical beaches and other ecological enhancements. The development shall thereafter be implemented in accordance with the approved details.

*Reason: To reduce the risk of flooding to the proposed development and future occupants and to ensure compliance with policy 5.12 of the London Plan (March 2015) and policy E2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

**Condition of the River Wall**

41. Prior to the commencement of the relevant part of the development a survey (including intrusive investigation / testing) of the river wall adjacent to the site, to establish the landward extent, structural integrity and stability of the wall, shall be carried out and the results of the survey shall be submitted to and approved by the Local Planning Authority.

*Reason: To maintain the integrity and stability of the flood defences in accordance with policy 5.12 of the London Plan (March 2015) and E2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

**Finished Floor Levels**

42. All habitable levels shall be set above the estimated Breach level with suitable freeboard to protect from flooding. Prior to the commencement of any above ground works within the relevant part of the development, floor plans detailing uses and finished floor levels in accordance with the Flood Risk Addendum Note dated 4 August 2015 (or any subsequent approved Flood Risk Document) shall be submitted to and approved by the Local Planning Authority.

*Reason: To reduce the risk of flooding to the proposed development and future occupants.*

**Archaeology**

43.

A) No development other than demolition to existing ground level shall take place in the relevant part of the development until the applicant (or their heirs and successors in title) has secured the implementation of a
programme of archaeological evaluation in accordance with a written scheme which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to the local planning authority.

B) If heritage assets of archaeological interest are identified by the evaluation under Part A, then before development, other than demolition to existing ground level, commences the applicant (or their heirs and successors in title) shall secure the implementation of a programme of archaeological investigation/mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.

C) No development other than demolition to existing ground level shall take place other than in accordance with the Written Scheme of Investigation approved under Part (B).

D) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (B), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Heritage assets of archaeological interest may survive on the site. The Local Planning Authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the National Planning Policy Framework and DH(m) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Delivery and Servicing Plan

44. The relevant part of the development shall not be occupied until a detailed Delivery and Servicing Plan (DSP) has been submitted to, and approved in writing by, the Local Planning Authority in consultation with Transport for London. The DSP shall include reasonable endeavours to ensure that deliveries are carried out outside of peak hours and shall in all respects be implemented in accordance with the details approved pursuant to this condition.

Reason: In order to safeguard residential amenity and pedestrian and traffic safety and ensure compliance with Policy 6.3 of the London Plan (March 2015) and IM3 and E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).
**Hours of Operation and Deliveries**

45. Full details of hours of operation including time of receiving deliveries or servicing of the proposed B1/A1/A2/A3/A4/A5/D1/D2/C1 uses hereby approved shall be submitted to, and approved by, the Local Planning Authority prior to the commencement of such uses. The uses shall thereafter be carried out in strict accordance with the approved details.

*Reason: In order to safeguard residential amenity and pedestrian and traffic safety and ensure compliance with Policy 6.3 of the London Plan (March 2015) and IM3 and E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).*

**Cycling**

46. As part of the reserved matters submissions for the relevant part of the development the submitted designs for the street hierarchy and the related cycling provision proposed for each street type should align with the principles set out in the London Cycling Design Standards (LCDS) 2014 (or other such document that amends alters or supersedes the LCDS). The development shall subsequently be carried out and completed in accordance with the details as approved.

*Reason To promote sustainable travel and to ensure compliance with and ensure compliance with the London Cycling Design Standards (LCDS) 2014 (or other such document that amends alters or supersedes the LCDS), Policy 6.9 of the London Plan (March 2015) and policies IM4, IM(b) and IM(c) of the Royal Greenwich Local: Core Strategy with Detailed Policies (2014).*

**Cycle Routes**

47. Full details of the proposed cycle routes which link with the existing cycle network shall be submitted to and approved by the Local Planning Authority prior to the commencement of the relevant part of the development and shall be constructed in accordance with the approved details.

*Reason To promote sustainable travel and to ensure compliance with and ensure compliance with Policy 6.9 of the London Plan (March 2015) and policies IM4, IM(b) and IM(c) of the Royal Greenwich Local: Core Strategy with Detailed Policies (2014).*
Cycle parking

48. Full details of the location and type of facilities for parking of cycles within the relevant part of the development for occupants and visitors shall be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of the relevant part of the development and once approved shall be fully implemented before the premises in each part of the development are first occupied. For the avoidance of doubt the provision should be accordance with the standards within the London Plan or the prevailing standards at the time of submitting the details.

Reason: To promote sustainable travel and to ensure compliance with and ensure compliance with Policy 6.9 of the London Plan (March 2015) and policies IM4, IM(b) and IM(c) of the Royal Greenwich Local: Core Strategy with Detailed Policies (2014).

Electric Vehicle Charging Points

49. Details of the electric vehicle charging points (EVCP) to be provided within the scheme shall be submitted to and approved by the local planning authority prior to first occupation of the relevant part of the development. Electric charging spaces will be provided for at least 20% of the total number of parking spaces, with a further 20% passive provision of car parking spaces in accordance with current policy guidance. The submitted details shall thereafter be implemented in strict accordance with the approved details, prior to the commencement of the uses on the site.


Car Park Management Plan

50. The relevant part of the development hereby approved shall not be occupied until a Car Park Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The Car Park Management Plan shall include details of all aspects of the management, allocation, conditions of use and monitoring of the residential and non-residential parking to be provided as well as the on-street visitor parking, coach parking, disabled parking, car club bays and Blue Badge parking. The scheme shall thereafter be implemented in strict accordance with the approved details.
Reason: To ensure that safe and secure off-street parking is maintained and managed to the satisfaction of the Council and ensure compliance with Policy 6.13 of the London Plan (March 2015) and Policies IM4 and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)

Traffic Calming Measures

51. Full details of traffic calming measures, road markings, signage, tactile paving, street lighting, highways drainage, entry treatments to car parks, location of highways trees within the relevant part of the site shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the relevant part of the development. The layout should be designed to encourage a low speed environment of 20 mph. The details shall be accompanied by a Stage 2 Safety Audit. The scheme shall be implemented in accordance with the approved details.

Reason: In order to maintain safety for all road users and to ensure compliance with Policy 6.3 of the London Plan (March 2015).

Accessibility Arrangements

52. Full details of access arrangements for each relevant part of the development for people with mobility difficulties shall be submitted to, and approved by, the Local Planning Authority prior to the commencement of the relevant part of the development and such development shall be completed in accordance with such details. For the avoidance of doubt this shall include large scale plans illustrating the different gradients on all routes to and through the site.

Reason: To facilitate movement by those with mobility difficulties and to comply with policy 7.2 of the London Plan (March 2015) and IM4 and IM(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Parking

53. Car parking shall be provided in accordance with the following ratios and amounts:

- A ratio of 0.25 spaces per dwelling unit
- 200 on-street visitor spaces
- 100 spaces for the film studio
The car parking spaces provided for the residential units shall be maintained solely for that purpose and no development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that order with or without modification) shall be carried out so as to interfere with such use of the parking.

Reason: To ensure that the amount of parking provided on the site complies with the amount of parked assessed in the Transport Assessment and in the interest of general traffic and safety and in compliance with policy 6.13 of the London Plan (March 2015) and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Disabled Parking

54. A minimum of 10% of the total parking bays for the development hereby approved shall be provided as being suitable for wheelchair users, prior to the first occupation of any part of the development hereby permitted and no development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that order with or without modification) shall be carried out so as to interfere with such use of the parking.

Reason: In order that the Council may be satisfied with the details of the proposal and ensure compliance with Policy 6.13 of the London Plan (March 2015) and Policies DH1 and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

On street parking

55. Details of the on-street parking, including parking reserved for Blue Badge holders shall be provided to the satisfaction of the Local Planning Authority in consultation with the Local Highways Authority prior to the construction of the relevant part of the development.

Reason: To ensure that adequate street parking provision is maintained in the interests of general traffic and safety and to ensure compliance with Policy 6.13 of the London Plan (March 2015) and Policies DH1 and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
Loading and Unloading

56. All relevant submission of reserved matters applications pursuant to condition 2 shall include details of loading areas. No loading or unloading of vehicles arriving at, or departing from, the premises shall be carried out except within the designated (on street or off street) loading areas within the curtilage of the site.

Reason: In order to safeguard the safety and amenity of users of surrounding roads the footways and ensure compliance with Policy 6.3 of the London Plan (March 2015).

Works to existing adopted highways

57. Full details of the works to be undertaken to existing adopted highways within the site shall be submitted to and approved by the Local Planning Authority and TFL prior to the commencement of the relevant part of the development and shall be built in accordance with the approved details.

Reason: In order to achieve safe movement for pedestrians, cyclists and vehicles and ensure compliance with policy 6.13 of the London Plan (March 2015).

Motorcycle Parking

58. All relevant submissions of reserved matters applications pursuant to condition 13 shall include details of motorcycle parking in accordance with the prevailing standards at the time of submission to the satisfaction of the Local Planning Authority in consultation with the Local Highways Authority.

Reason: To promote sustainable travel and to ensure compliance with and ensure compliance with Policy 6.9 of the London Plan (March 2015) and policies IM4, IM(b) and IM(c) of the Royal Greenwich Local: Core Strategy with Detailed Policies (2014).

Land Reserved for Greenwich Riverside Transit (or similar)

59. All relevant reserved matters applications submitted pursuant to condition 13 shall clearly show the alignment of the Greenwich Riverside Transit route alignment as reserved in application 02/2903/O approved on the 23rd of February 2004. Prior to the submission of the first reserved matters application the applicant shall submit details of the minimum height, which shall be up to 6m, for any development over the GRT
route (or similar public transport proposal) for approval by the Local Planning Authority in consultation with TfL, having consulted with TfL prior to the submission of the details. The scheme shall thereafter be implemented in strict accordance with the approved details.

**Reason:** In order that the Local Planning Authority may be satisfied with the details of the proposal and to safeguard residential amenity and pedestrian and traffic safety and ensure compliance with Policy 6.3 of the London Plan (March 2015) and Policies IM3 and IM4 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Travel Plan**

60. The scheme shall not be occupied until a detailed site specific Travel Plan incorporating measures to promote and maximise the use of sustainable travel (including public transport, walking, cycling and use of the river) and monitoring arrangements for both the construction and operation of the development has been submitted to, and approved by, the Local Planning Authority for the relevant part of the development. The Travel Plan should include details of car club spaces for the development as well as measurable targets and a monitoring plan. The Travel Plan shall in all respects be implemented in accordance with the details approved pursuant to this condition.


**Construction Travel Plan**

61. Prior to the demolition / construction of the relevant part of the development a detailed site specific Demolition / Construction Travel Plan incorporating measures to promote and maximise the use of sustainable travel (including public transport, walking, cycling and use of the river) and monitoring arrangements for the construction of the development has been submitted to, and approved by, the Local Planning Authority. The Travel Plan shall in all respects be implemented in accordance with the details approved pursuant to this condition.

Lifetime Homes Standards and Wheelchair Housing

62. All dwellings hereby approved shall be constructed to Lifetime Homes standard. At least 10% of the social rented units shall be designed to full wheelchair standards in accordance with Greenwich Wheelchair Site Brief (2012) (GWSB) and 10% of all other units shall be capable of adaption to wheelchair units in accordance with the requirements of the London Plan. All social rental accessible units should have a dedicated accessible parking bay. Full details shall be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of the relevant part of the development.

Reason: To comply with Policy 7.2 of the London Plan (March 2015) and H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

Hotel

63. Up to 10% of the rooms in the proposed hotel shall be wheelchair accessible.

Reason: To comply with Policy 7.2 of the London Plan (March 2015) and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

Refuse Collection

64. Prior to the commencement of the relevant part of the development, full details of the refuse storage, recycling facilities and refuse collection point arrangements and details of vehicle tracking for the refuse vehicles accessing the proposed collection points for all uses, are to be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the Council may be satisfied with the details of the proposal and ensure compliance with policy 5.16 of the London Plan (March 2015) and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Refuse and recycling

65. Full details of a refuse and recycling strategy for all uses shall be submitted to and approved by the Local Planning Authority prior to the commencement of the relevant part of the development.
Reason: In order to ensure compliance with DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

Plant

66. Prior to the commencement of the relevant part of the development hereby permitted, an acoustic report providing an assessment in accordance with BS 4142:2014 (or relevant update) ‘Methods for rating and assessing industrial and commercial sound’ shall be submitted to and approved by the Local Planning Authority. The noise from any plant or equipment such as air handling units, boilers, lifts, mechanical ventilation etc. which forms part of the development shall not cause the existing background noise level to increase when measured at one metre from the façade of the nearest noise sensitive premises. In order to achieve this, the plant shall be designed/selected, or the noise from the plant should be attenuated, so that the noise level from the plant is 10dB or more below the existing representative background noise level (LA90 15min) which should be determined in accordance with the Standard. Where any building in the proposed development has within it an A3 food use, prior to the commencement of works on the development hereby permitted, details of a possible protected internal route for the provision of a flue through the building shall be submitted to and approved by the Local Planning Authority. The approved works are to be completed prior to occupation of the development and shall be permanently maintained thereafter. The approved scheme shall be implemented prior to first occupation of the development and shall be permanently maintained thereafter. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed.

Reason: In order to safeguard the amenities of neighbouring properties and the area generally, to prevent ‘ambient noise creep’ and to ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Commercial and Licensed Premises

67. No development shall take place until a detailed scheme of noise insulation measures for all divisions walls and/or floors separating commercial/residential areas has been submitted to and approved in writing by the Local Planning Authority for the relevant part of the development. The scheme of noise insulation measures shall be prepared by a suitably qualified consultant/engineer and shall demonstrate that the

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proposed sound insulation will achieve a level of protection which is at least +5dB above the Approved Document E standard dwelling houses and flats for airborne sound insulation and -5dB for impact sound insulation. The approved scheme shall be implemented prior to the commencement of the use and be permanently retained thereafter.

Reason: In the interest of the prospective residential occupiers of the accommodation and ensure compliance with E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Mechanical and Extract Ventilation

68. Prior to the commencement of the relevant part of development, full details of any mechanical ventilation or other plant associated with the commercial operation of the building shall be submitted to and approved by the Local Planning Authority. Details should include full specifications of all filtration, deodorising systems, noise output and termination points. Particular consideration should be given to the high level discharge of kitchen extract air/ the discharge of toxic or odoriferous extract air where a high level of discharge is usually essential. The approved scheme shall be completed prior to occupation of the development and shall be permanently maintained thereafter. Reference shall be had to Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems published by DEFRA (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69280/pb10527-kitchen-exhaust-0105.pdf)

Reason: In order to safeguard the amenities of neighbouring properties and the area generally, to prevent ‘ambient noise creep’ and to ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Sound Insulation

69. Prior to the commencement of the relevant part of the development hereby permitted, details of the proposed sound insulation scheme to be implemented between residential accommodation and roof gardens shall be submitted to and approved by the Local Planning Authority. Details should include airborne and impact sound insulation. On completion of the development the developer shall certify to the local planning authority that any additional noise mitigation measures considered necessary have been implemented. The approved scheme is to be completed prior to
occupation of the relevant part of the development and shall be permanently maintained thereafter.

Reason: In the interest of the prospective residential occupiers of the accommodation and ensure compliance with E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Noise Assessment

70. Prior to the submission of the relevant reserved matters application for each part of the development hereby permitted, an assessment of noise levels affecting that part of the development, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the amenities of future residents, neighbouring properties and the area generally and ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Environmental Noise

71. Based upon the noise assessment undertaken pursuant to condition 70 reserved matters applications must demonstrate that noise mitigation measures shall be provided to ensure that internal noise levels specified in table 4, section 7.7.2 of the current BS8233 2014 (or the equivalent relevant replacement standard at the time) are met in all residential premises.

Any mechanical ventilation systems in residential premises shall meet or exceed the specifications set out in Schedule 1, Part III, Clauses 6 and 7 of the Noise Insulation Regulations 1975 with regard to acoustic performance and airflow rates. Alternative schemes that meet the above noise and ventilation standards can be considered. The approved scheme is to be completed prior to the occupation of the relevant part of the development and shall be permanently maintained thereafter. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed prior to first occupation of the relevant part of the development. Details should include mitigation measures such as siting, orientation, noise barriers and other such measures where appropriate. In assessing noise the Local planning Authority shall have regard to the Planning Policy Practice Guidance on Noise http://planningguidance.planningportal.gov.uk/blog/guidance/noise/noise-guidance/
Noise levels in traditional external amenity areas used for amenity space such as larger gardens, roof gardens and terraces shall, where practicable, not exceed the upper guideline value of 55 dB $L_{Aeq,T}$ specified in Section 7.7.3.2 of BS 8233:2014. However, where this is not practicable, in accordance with the Standard, these areas of the development shall be designed to achieve the lowest practicable levels.

For other locations, such as smaller balconies, roof gardens and terraces, whilst these areas are important in residential buildings where external amenity space is limited, in accordance with the Standard, the specification is not considered necessary on the basis that the benefit in having some open space outweighs any excess noise effects.

Reason: In order to minimise the environmental effects of the development and ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Environmental Method Statement and Integrated Management System

72. The development of this site should only commence in accordance with the principles of the Procedures and Codes of Practice documented in the Environmental Method Statement Volumes 1 and 2 (including any necessary legislative amendments or updates) approved by the Local Planning Authority under planning application Ref. 04/3245/SD on 23 February 2005 and the Integrated Management System (including any necessary legislative amendments or updates) approved by the Local Planning Authority under planning application Ref. 05/1272/SD on 16 November 2005 for the Greenwich Peninsula Masterplan site or any subsequent approved documents approved in writing by the Local Planning Authority.

Reason: In order to minimise the environmental effects of the development and ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Contamination

73. No development within the relevant part of the development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with
contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1) A preliminary risk assessment which has identified;
   • all previous uses;
   • potential contaminants associated with those uses;
   • a conceptual model of the site indicating sources, pathways and receptors;
   • potentially unacceptable risks arising from contamination at the site.

2) Should the preliminary risk assessment identify the need for further investigation, a site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. Where contamination is found in areas of land to be used for private gardens, a minimum cap of 1m of clean soil shall be laid.

4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure the development is consistent with the aims of the National Planning Policy Framework and the Greenwich Peninsula Environmental Method Statement and to ensure compliance with Policy 5.21 of the London Plan (March 2015) and Policy E(e) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Verification Report

74. On completion of the remediation but before the relevant part of the site is first occupied a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the
local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved. No occupation in the relevant part of the development shall take place until a verification report has been approved for the corresponding part of the site.

Reason: To ensure issues related to historic contamination of the site are managed in accordance with the NPPF and the Greenwich Peninsula Environmental Method Statement (EMS) to manage risks to groundwater in the underlying aquifers and ensure compliance with Policy 5.21 of the London Plan (March 2015) and Policy E(e) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Reporting of Unexpected Contamination

75. If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.

Reason: Groundwater quality needs to be protected. Any visibly contaminated or odorous material encountered on the site during the development work, must be investigated. The Planning Authority must be informed immediately of the nature and degree of contamination present and to comply with Policy 5.21 of the London Plan (March 2015) and Policy E(e) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Clean Cap material

76. A minimum of 1 metre of clean cap material above residual contaminated levels for residential back gardens and semi private garden squares must be provided unless otherwise agreed in writing with the Local Planning Authority.

Reason: In the interests of the prospective occupiers of the land and to comply with Policy 5.21 of the London Plan (March 2015) and Policy E(e) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
**Boreholes**

77. The groundwater monitoring borehole locations approved on the 1st May 2002 (Ref 01/2025/R) shall be retained as monitoring locations in accordance with a detailed monitoring strategy submitted pursuant to this planning permission unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to prevent pollution of the water environment.

**Energy Performance**

78. All dwellings within the development hereby permitted must achieve the following energy performance standards:

(i) All houses and flats whose material operations have commenced prior to 1st October 2016 must achieve a minimum of a thirty five per cent (35%) reduction in building carbon dioxide emissions beyond Part L of the Building Regulations 2013.

(ii) All houses and flats whose material operations have commenced on or after 1st October 2016 must achieve zero carbon dioxide emissions.

(iii) The relevant part of the development hereby permitted shall not be occupied until evidence of the energy performance standard referred to in part [(i)] [(ii)] of this Condition having been achieved, has been submitted to, and approved in writing by, the Local Planning Authority.

Reason: To minimise future carbon dioxide emissions and mitigate climate change, and to comply with Policy 5.2 of the London Plan (March 2015) and policy E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Water efficiency**

79. The development hereby permitted shall comply with Regulation 36(2)(b) of the Building Regulations 2010 (as amended by the Building Regulations &c. (Amendment) Regulations 2015/767) and as set out in section G2 of the Building Regulations Approved Document (110 litres per person per day).

Rainwater Recycling

80. No later than at the time of submission of the reserved matters application in respect of the Film Studios, a report on the feasibility of recycling rainwater on the film studios roof to supply irrigation requirements around it, and particularly those of Central Park shall be submitted to and approved by the Local Planning Authority. The development shall be carried out in accordance with the details as approved, shall be maintained as such thereafter and shall not be amended without the prior written consent of the Local Planning Authority.

Reason: To reduce the amount of potable water consumed from the water mains supply and contributes towards the sustainable use of water. To comply with Policy 5.13 of the London Plan (2015) and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

BREEAM (for all non-residential uses)

81.

a) The non-residential development (over 500sqm) hereby permitted shall seek to achieve BREEAM Excellent provided that it shall be built to at least a minimum of BREEAM Very Good (or its successor).

b) Within three months of commencement of the relevant part of the development, a Design Stage assessment (under the BREEAM or its successor) for the shell and core development shall be carried out and a copy of the summary score sheet and interim Code Certificate shall be submitted to the Local Planning Authority. If the details submitted show that the development does not achieve BREEAM Excellent (or its successor), a statement shall be submitted explaining why it has not been achieved and setting out possible measures to achieve it at the post-construction stage.

c) Within 3 months of the first occupation of the non-residential use, a copy of the summary score sheet and Post Construction Review Certificate (under BREEAM or its successor) shall be submitted to the Local Planning Authority verifying that the agreed standards have been met.

Reason: In the interest of addressing climate change and to secure sustainable development and to comply with Policy 5.3 of the London Plan (March 2015) and DH1 and E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
Extensive Green Roofs

82. Full details of green roofs which shall be compliant with GRO Green Roof Code 2011 (or its successor) shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the relevant part of the development hereby approved. For all development including a green roof, a report from a suitably qualified ecologist specifying how the living roof has been developed for biodiversity with details of landscape features and a roof cross section must be provided.

The green roof submission must provide/comprise of the following information:

- biodiversity based with extensive/semi-intensive soils
- substrate which is commercial brick-based aggregate or equivalent with a varied substrate depth of 80 -150mm planted with 50% locally native herbs/wildflowers in addition to sedum. - There should a minimum of 10 species of high ecological value, 10 species of medium ecological value and 10 of standard ecological value (listed in the Environment Agency’s - Green Roof Toolkit)
- include additional features such as areas of bare shingle, areas of sand for burrowing invertebrates and individual logs or log piles

The development shall be carried out strictly in accordance with the details approved, shall be maintained as such thereafter and no alterations to the approved scheme shall be permitted without the prior written consent of the Local Planning Authority.

Evidence that the green roof has been installed in accordance with the details above should be submitted to and approved by the local planning authority prior to first occupation of the relevant part of the development.

**Reason:** To provide insulation and to contribute towards enhancing biodiversity, reducing flood risk and improving the aesthetic value of the development as well as resident’s well-being. To comply with policy 5.11 of the London Plan (March 2015) and OS(f) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Brown Roofs

83. Full details of brown roofs shall be submitted to and approved in writing by the Local Planning Authority prior to the implementation of the relevant part of the development hereby approved. For all development including
brown roofs, a report from a suitable qualified ecologist should be provided specifying how the brown roof has been developed for biodiversity with details of landscape features and a roof cross section. The brown roofs must provide/comprise of at least the following:

a) a base mixture of crushed brick or concrete aggregate from the original site graded from 25mm to dust
b) contain a collection of larger aggregate items 40-75mm
c) contain larger boulders
d) be contoured from heights of at least 5cm to 15cm
e) have a gravel base and drainage points
f) have a protective rubber membrane
g) be allowed to colonise naturally or allow interspersed seed mix if appropriate
h) consist of material from the site itself and allowed to sit on site during construction
i) areas of bare shingle, areas of sand for burrowing invertebrates and individual logs or log piles
j) mould dune sand and compacted crushed brick and concrete in gentle slope formation

The development shall be carried out strictly in accordance with the details approved, shall be maintained as such thereafter and no alternations to the approved scheme shall be permitted without the prior written consent of the Local Planning Authority.

Reason: To provide insulation and to contribute towards enhancing biodiversity, reducing flood risk and improving the aesthetic value of the development as well as resident’s well-being. To comply with policy 5.11 of the London Plan (March 2015) and OS(f) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Intensive Green Roofs (roof gardens to be used as outdoor amenity space)

84. For all development including intensive green roof full details for the relevant part shall be submitted to and approved in writing by the Local Planning Authority prior to the implementation of the relevant part of
development hereby approved. Roofs shall which shall be compliant with the GRO Green Roof Code 2011 (or its successor). Information submitted should include:

a) an ecological management plan including the landscape features and a cross section of the roof

b) specified maintenance plan with allocated responsibilities

c) assessment of the effectiveness of the living roof as a source control mechanism and interceptor for a Sustainable Urban Drainage System (SUDS).

d) The green roof should be comprised of, but not necessarily limited to, the following:

- soil and vegetation to cover a minimum of 70% of the green roof area for water attenuation purposes

- a minimum of 25% of the vegetated area should be native species. Of the remaining vegetated area, a minimum of 50% should be of known wildlife value (rather than purely ornamental).

The development shall be carried out in accordance with the details approved, shall be maintained as such thereafter and no alterations to the approved scheme shall be permitted without the prior written consent of the Local Planning Authority.

Evidence that the roof has been installed in accordance with the details above should be submitted to and approved by the Local Planning Authority prior to first occupation.

Reason: To provide insulation and to contribute towards enhancing biodiversity, reducing flood risk and improving the aesthetic value of the development as well as resident’s well-being. To comply with policy 5.11 of the London Plan (March 2015) and OS(f) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Sustainability Measures

85. Each reserved matters application submitted pursuant to condition 13 shall be accompanied by a Sustainability Strategy which sets out the sustainability measures to be incorporated in the development.
**Reason:** To reduce energy consumption and protect natural resources and to ensure compliance with Policies 5.2, 5.3, 5.6, 5.9, 5.10, 5.13, 5.15, 5.16 and 5.18, of the London Plan (March 2015) and Policies E1 and CH2 Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014)

**CEEQUAL**

86. The development must achieve a minimum of CEEQUAL Very Good standard. A CEEQUAL certified Interim Client & Design Award for a minimum of a ‘Very Good’ standard shall be submitted to and approved by the Local Planning Authority prior to the implementation of the relevant part of the development.

**Reason:** To comply with Policy 5.3 of the London Plan (March 2015) and Policy IM1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**BRE Green Guide**

87. Details demonstrating that all building materials to be used on the development comply with the BRE Green Guide to Housing Specification categories A, B or C only shall be submitted to and approved by the Local Planning Authority prior to commencement of the relevant part of the development. The development shall be carried out in accordance with the details as approved unless minor variations thereto are otherwise agreed in writing by the Local Planning Authority.


**Riparian Life Saving Equipment**

88. Full details of riparian life saving equipment shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the relevant part of the development. The details approved pursuant to this condition shall be implemented first prior to occupation of the relevant part of development and shall be retained in perpetuity thereafter.

**Reason:** In the interests of creating a safe riverside walk and to ensure compliance with CH1 Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).
Hard and Soft Landscaping and Open Space

89. Prior to the commencement of the relevant part of the development, landscaping details shall be submitted to the Local Planning Authority for approval and shall include full details, as necessary, of the open space and the design and landscaping of all unbuilt areas, including hard and soft surfacing, means of enclosure, lighting, street furniture and proposals for mitigation of potential wind conditions and how the new landscaping will be formed without threatening the integrity of the river wall and the Thames Tidal Flood defences. Such a landscaping scheme shall be completed within one year of the completion of the relevant part of the development.

Reason: In order to improve the character and amenities of the area and ensure compliance with policies 7.2, 7.5 and 7.19 of the London Plan (March 2015) and DH1, OS(f) and OS(g) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Preliminary Ecological Assessment

90. For each relevant part of the development, prior to demolition and construction works commencing on the relevant part of the site, an ecological assessment including a Phase 1 Habitat Survey detailing all features of ecological value on the site and setting out measures for their protection during construction works shall be submitted to and approved by the Local Planning Authority. Any mitigation measures identified therein shall be implemented in accordance with the approved details.

Reason: To ensure retention of habitats or mitigation for the loss of habitats and to comply with Policy 7.19 of the London Plan (March 2015) and policy OS4 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)

Landscaping and ecological management plan

91. Prior to the commencement of the relevant part of the development a landscape and ecological management plan including long term design objectives, protection of wildlife habitation, management responsibilities and maintenance schedules for all landscape areas, (except for privately owned domestic gardens), including appropriate planting shall be submitted to and approved in writing by the Local Planning Authority. Development proposals must ensure no net loss of biodiversity and wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.
The submitted information shall include:

a) A report from a suitably qualified ecologist specifying how the landscape features have been developed for biodiversity and ecological enhancement having regard to the measures outlined on page 98 of the Design and Access Statement dated February 2015 or any subsequent updates as approved by the LPA.

b) Details of all landscape features including plans and cross sections

The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

Reason: To ensure that the landscape within the site is managed in such a way as to protect and enhance the ecological value of the site including the intertidal terraces, and to ensure suitable access to the tidal flood defences is maintained, in accordance with National Planning Policy Framework (NPPF) paragraph 109 and 118.

Timing of vegetation clearance (breeding birds)

92. All removal of trees, hedgerows, shrubs, scrub or tall herbaceous vegetation shall be undertaken between September and February inclusive. If this is not possible then a suitably qualified ecologist shall check the areas concerned immediately prior to the clearance works to ensure that no nesting or nest-building birds are present. If any nesting birds are present then the vegetation shall not be removed until the fledglings have left the nest.

Reason: All wild birds, their nests and young are protected during the nesting period under The Wildlife and Countryside Act 1981 (as amended).

Arboricultural Management

93. a) No tree works shall take place until methods of work, position of site offices, material storage, compounds, parking and tree protection and impact mitigation measures prior to commencement of the relevant part of the development and the associated clearance work have been agreed in writing by the Local Planning Authority.
b) The recommended measures for Arboricultural Management will be identified by an Arboricultural Impact Assessment and will be carried out in full.

c) All permitted or approved tree work will be carried out in accordance with the British Standard BS3998:2010, an Arboricultural Association Approved Contractor or an ISA Certified Arborist/Tree Worker suitably insured and experienced to carry out the tree works.

d) All tree works are to be carried out between July and September or November and February. Tree works should also avoid the season for nesting birds.

e) No tree works shall be undertaken until the ‘all clear’ is given, or a programme of recommendations is received in writing as a result of a bat survey conducted by a suitably qualified ecologist.

f) All tree works and tree surgery works will be carried out prior to the development of the site, and erection of protective fencing.

g) All protective measures; including fencing, shall be implemented prior to any demolition or construction works and remain in situ and intact throughout the duration of the development. Written approval by the Local Planning Authority shall be obtained prior to any temporary removal of protective measures during the development period.

h) Should additional tree works become apparent during the construction process; written consent will be required from the Local Planning Authority prior to these additional works being undertaken.

i) Any trees or plants which die within a period of 5 years from the date of planting, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to improve the character and amenities of the area and ensure compliance with policies 7.19 and 7.21 of the London Plan (March 2015) and policy OS(f) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)

Wayfinding

94. Prior to the first occupation of the relevant part of the development hereby permitted, details of a wayfinding strategy encompassing the wider area around the site including the routes to and from the North
Greenwich Transport Interchange, Peninsula Square, the Emirates Airline and the Thames footpath shall be submitted to and approved by the Local Planning Authority, in consultation with TfL. The wayfinding signage shall be provided on the site prior to first occupation of the relevant part of the development in consultation with TfL.

Reason: In order to ensure that people are aware of the pedestrian and cycle routes, location of the North Greenwich Transport Interchange, Peninsula Square, the Emirates Airline, Thames Clipper, the Thames footpath, pedestrian and cycle routes, whilst maintaining the character and amenities of the area and ensure compliance with DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Lighting**

95. Full details of lighting and external illumination for the relevant part of the development shall be submitted to, and approved in writing by, the Local Planning Authority in consultation with the PLA and London City Airport prior to the occupation of the relevant part of the development. Such details shall demonstrate that the lighting has been designed to minimise potential impacts on navigation and include a strategy for the lighting to be adjusted should it be found to be a hazard to navigation once it has been installed.

There shall be no light spill into the watercourse or adjacent river corridor habitat. To achieve this, and to comply with sustainability, artificial lighting should be directional and focused with cowlings to light sources in close proximity to the river corridor.

Reason: In order to safeguard the general amenities of the local area, safety of vessels navigating the river and ecology and to ensure compliance CH1 and OS(g) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Carbon Emissions Reduction**

96. Each development zone of the development hereby permitted shall achieve no less than a thirty five per cent (35%) reduction in building carbon dioxide emissions over Part L 2013 of the building regulations.

Reason: In the interest of addressing climate change and to secure sustainable development and to comply with Policy 5.3 of the London Plan (March 2015) and
Carbon Emissions Reduction

97. Each reserved matters application submitted pursuant to condition 13 shall include an energy statement, using detailed Part L compliant modelling rather than benchmarks, detailing how the development proposals, in accordance with the energy hierarchy, meet the required 35% reduction target and which demonstrates that both the domestic and non-domestic elements of the development shall be designed to meet Part L 2013 criterion 1 target carbon emissions through fabric energy efficiency measures alone; unless the Local Planning Authority agrees that the nature of the development that is the subject of the reserved matters application is such that an energy statement would not be relevant.

Reason: In the interest of addressing climate change and to secure sustainable development and to comply with Policy 5.3 of the London Plan (March 2015) and DH1 and E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Carbon Emissions Reduction

98. Prior to first occupation of each building the developer shall submit evidence that the 35% reduction over Part L 2013 of the building regulations has been achieved.

Reason: To minimise future carbon dioxide emissions and mitigate climate change, and to comply with Policy 5.2 of the London Plan (March 2015) and policy E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

On-site renewable energy technologies

99. Each reserved matters application submitted pursuant to condition 13 shall include an assessment of the feasibility of including on-site renewable energy generation. The details shall include:

a) An energy assessment stating:
   • baseline energy demands in kWh and kg/CO₂ for regulated energy use required by building regulations and non-regulated energy use.
• energy reduction achieved on the baselines through the use of on-site renewable energy technologies in KWh, kg/CO$_2$ and % CO$_2$ reduction.

b) The resulting scheme, along with machinery/apparatus location, specification and operational details

c) A management plan for the operation of the technologies

d) (if applicable) A servicing plan including times, location, frequency, method of servicing (and any other details the Local Planning Authority deems necessary)

e) (if applicable) A noise assessment regarding the operation of the technology

f) (if applicable) Justification as to why renewable energy is not feasible for that part of the development.

The development shall be carried out in accordance with the details hereby approved, shall be maintained as such thereafter and no amendments to the approved scheme shall be permitted without the prior written consent of the Local Planning Authority.

Reason: To contribute towards carbon dioxide emissions reduction and to comply with Policy 5.7 of the London Plan (March 2015) and policy E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**On-site renewable energy technologies – evidence of installation**

100. Evidence that the scheme of renewable energy provision has been installed in accordance with the condition 99 above including evidence of commissioning and a copy of the building’s Energy Performance Certificate, shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby approved.

Reason: To contribute towards carbon dioxide emissions reduction and to comply with Policy 5.7 of the London Plan (March 2015) and policy E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**On-site renewable energy technologies – monitoring**

101. To monitor the effectiveness of the renewable energy technology, a monitoring agreement will be signed with the Local Planning Authority
prior to first occupation to comply with the prevailing monitoring requirements which will include the installation of an on-site automatic meter reading (AMR) device by the developer.

Reason: To contribute towards carbon dioxide emissions reduction and to comply with Policy 5.7 of the London Plan (March 2015) and policy E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Future connection to heating, cooling and power networks

102. Full details demonstrating how the approved scheme connects to the Greenwich Peninsula Low Carbon Energy Centre shall be submitted to and approved in writing by the Local Planning Authority. Evidence that the approved scheme has been implemented shall be submitted to and approved by the Local Planning Authority prior to the issue of a certificate of practical completion. The development shall be carried out in accordance with the approved design details and no alterations shall take place without the prior written consent of the Local Planning Authority.

Reason: To allow for the efficient distribution of energy, to minimise carbon dioxide emissions and to comply with policy 5.6 London Plan (March 2015) and E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Blackwall Tunnel Vent Shaft 4

103. Prior to the commencement of work on Plots 1.01, 1.02 and 1.03, details of the minimum distance to be observed between any buildings in the development and the Blackwall Tunnel Vent Shaft 4 shall be submitted to and approved by the Local Planning Authority in consultation with TfL, the applicant having consulted with TfL prior to the submission of the details. The scheme shall thereafter be implemented in strict accordance with the approved details.

Reason: To ensure that the development does not impact on the Blackwall Tunnel Vent Shaft 4.

Blackwall Tunnel and Vent Shaft 4

104. No work shall commence on plots 1.01, 1.02 and 1.03, until the following information has been submitted to and approved by the Local Planning Authority in consultation with TfL:

• Information to confirm that the operation of the Blackwall Tunnel Vent Shaft fans will not be affected by the development;
• Full details of the means of enclosure and access gates for the Blackwall Tunnel Vent Shaft Compound,
• A Safety Audit a safety audit of the proposed works in respect of impact on the Blackwall Tunnel;

Reason: To ensure that the development does not impact on the Blackwall Tunnel Vent Shaft 4.

**TfL Vent Shaft 4 compound**

105. No work shall commence on plots 1.01, 1.02 and 1.03, until full details of the TfL Vent Shaft 4 compound, including site area, layout and means of enclosure and entrance gates, have been submitted to and approved by the Local Planning Authority in consultation with TfL.

Reason: To ensure that the development does not impact on the Blackwall Tunnel Vent Shaft 4.

**London Underground**

106. The relevant part of the development hereby permitted that falls within the London Underground influence zone shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

• Comply with the London Underground Limited ‘Rules for Development’ report number 407/JLE OS3/003A (or equivalent)
• provide details on all structures
• accommodate the location of the existing London Underground structures and tunnels
• accommodate ground movement arising from the construction thereof
• and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The relevant part of the development shall thereafter be carried out in all respects in accordance with the approved design and method statements,
and all structures and works comprised within the relevant part of the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

The extent of the influence zone shall be agreed with London Underground prior to the submission of the required details set out above.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan (March 2015) Table 6.1 and ‘Land for Industry and Transport’ Supplementary Planning Guidance 2012

Air Quality Monitoring

107. The reserved matters application for each relevant parts of the development, shall include a suitable dust monitoring study shall be conducted to the satisfaction of the Local Planning Authority in consultation with the PLA in order to determine the level of dust mitigation required for the scheme. The results of the study shall be submitted to the local planning authority at the same time as the submission of the any reserved matters application for the relevant parts of the development. The reserved matters application shall demonstrate how any required mitigation has been incorporated into the design of the relevant part of the development. The development shall be implemented in strict accordance with the details approved prior to first occupation of the relevant part of the development.

Reason: To safeguard the amenities of future residents, neighbouring properties and the area generally and ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Air Quality Assessment and Mitigation

108. The reserved matters application for each relevant parts of the development shall include a scheme to minimise the exposure of future occupants to air pollution at the development shall be submitted to, and approved in writing by, the Local Planning Authority in consultation with the PLA. If required, further detailed modelling will be undertaken to inform the design of the scheme. The reserved matters application shall demonstrate how any required mitigation has been incorporated into the
design of the relevant part of the development. The scheme shall be implemented in strict accordance with the approved details prior to first occupation of the relevant part of the development.

Reason: To safeguard the amenities of future residents, neighbouring properties and the area generally and ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Noise Assessment

109. Prior to the submission of any reserved matters application for those plots in Development Zones A and E shall include an assessment of the potential noise effects from night time wharf activities at and associated with Victoria Deep Water Terminal, Bay Wharf and Tunnel Wharf on the proposed residential properties shall be undertaken and submitted to, and approved in writing by, the Local Planning Authority in consultation with the Port of London Authority. Prior to the commencement of the assessment, the scope of the assessment shall be submitted to and agreed with the Local Planning Authority and the Port of London Authority. The reserved matters application shall demonstrate how any required mitigation has been incorporated into the design of the relevant part of the development. The scheme shall be implemented in strict accordance with the approved details prior to first occupation of the relevant part of the development.

Reason: To safeguard the amenities of future residents, neighbouring properties and the area generally and ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Victoria Deep Water Terminal

110. A detailed strategy including appropriate mitigation measures such as sound attenuation, screening or any other such necessary measures required to protect the amenities of any proposed residential properties adjacent to Victoria Deep Water Terminal, Bay Wharf and Tunnel Wharf and the operational requirements of the existing uses at the wharves shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Port of London Authority with the submission of reserved matters application. The reserved matters application shall demonstrate how any required mitigation has been incorporated into the
design of the development in Development Zones A and E. Such mitigation measures shall be implemented prior to occupation of Plots within Zones A and E of the development. The required mitigation measures shall be based upon the following:

Wharf and Dredger Noise
- The maximum external noise level at openable windows to habitable rooms from wharf and dredger noise alone shall be 44 dB $L_{Aeq, 8hr}$.
- If maximum external noise levels from wharf and dredger noise alone exceed 44 dB $L_{Aeq, 8hr}$, then windows to habitable rooms will be provided as fixed and unopenable.
- Where maximum external noise levels are in excess of 44 dB $L_{Aeq, 8hr}$ from wharf and dredger noise alone at windows to non-habitable rooms, windows would only be openable if noise levels in the nearest habitable rooms are equal to or less than 30 dB $L_{Aeq, 8hr}$.

Low Frequency Dredger Noise
- The maximum external noise level at openable windows to habitable rooms from low frequency dredger noise alone shall be 39 dB $L_{Aeq, 8hr}$ at 63 Hz.
- If maximum external noise levels from low frequency dredger noise alone exceed 39 dB $L_{Aeq, 8hr}$ at 63 Hz, then windows to habitable rooms will be provided as fixed and unopenable.

Such mitigation measures shall be implemented in strict accordance with the approved details prior to first occupation of the relevant part of the development.

Reason: To safeguard the amenities of future residents, neighbouring properties and the area generally and ensure compliance with Policy 7.15 of the London Plan (March 2015) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Secured by Design

111. ‘Secured By Design New Homes 2014’ (or equivalent) accreditation for the relevant part of the development hereby permitted shall be obtained, a copy of which must be submitted to and approved in writing by the Local
Planning Authority within 3 months of the completion of the relevant part of the development’.

Reason: In order to ensure that the development is designed to provide for and improve personal safety and security in compliance with CH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Residential Design Standards

112. The residential units shall be designed to comply with the design standards set out in the Mayor of London Housing SPG (November 2012) (or such other relevant standard). All reserved matters applications for residential development shall include a schedule setting out how the scheme meets the requirements of this standard.

Reason: In order to ensure an appropriate living environment for future occupiers and compliance with 3.5 of the London Plan (March 2015); the Mayor’s Housing SPG (November 2012)(or such other relevant standard); and policy H5 and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Children’s Play Areas

113. The Reserved Matters applications shall include details of the children’s play areas to meet the standards and amount of provision required in the Mayor’s Supplementary Planning Guidance ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation’ (September 2012) or other such relevant updated document.

Reason: In order to ensure that sufficient on-site play facilities are provided for the future occupiers of the development and to ensure compliance with Policy 3.6 of the London Plan (March 2015); Mayor’s Supplementary Planning Guidance ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation’ (September 2012) (or such other relevant standard); and Policies H5 and H(e)of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Details of Children’s Play Areas

114. Full details of the children’s play areas and play equipment proposed to achieve compliance with the Mayor’s Supplementary Planning Guidance ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation’ (September 2012) (or such other relevant standard) shall be submitted to, and approved in writing by, the Local Planning Authority prior to the first occupation of the relevant part of the development.
play areas and play equipment shall be fully implemented in accordance with the approved details prior to the occupation of the relevant part of the development and shall be retained in perpetuity thereafter.

Reason: In order to ensure that sufficient on-site play facilities are provided for the future occupiers of the development and to ensure compliance with Policy 3.6 of the London Plan (March 2015); Mayor’s Supplementary Planning Guidance ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation’ (September 2012) (or such other relevant standard); and Policies H5 and H(e) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

P5K running track

115. The first reserved matters application for the relevant part of the development pursuant to condition [ ] shall include detailed plans/sections and elevations and details of how the running track structure will be implemented without threatening the integrity of the river wall and the Thames Tidal Flood defences.

Reason: In order that the Local Planning Authority may be satisfied with the appearance of the P5K running track; safeguarding amenity and safety of residents and users; and promoting of a healthy lifestyle. To ensure compliance with policies 3.2, 3.19, 7.2, 7.3 and 7.5 of the London Plan (March 2015); and DH1 and CH2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

116. The proposed timeframe for delivery of the P5K running track shall be submitted to and approved by the Local Planning Authority prior to the occupation of the first reserved matters. The subsequent zonal masterplans and reserved matters submitted pursuant to conditions [ ] shall include details of the P5K running track in substantial accordance with the approved details.

Reason: In order that the Local Planning Authority may be satisfied with the appearance of the P5K running track; safeguarding amenity and safety of residents and users; and promoting of a healthy lifestyle. To ensure compliance with policies 3.2, 3.19, 7.2, 7.3 and 7.5 of the London Plan (March 2015); and DH1 and CH2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Structures in the River

117. The relevant reserved matters applications which include proposals for the new Meridian Quays Jetty or any existing structures in the River Thames shall demonstrate that the proposals include river related uses.
The scheme shall thereafter be implemented in strict accordance with the approved details.

**Reason:** To satisfy the Local Planning Authority that opportunities to provide river related uses on the Jetty have been maximised and to ensure compliance with Policies 7.24, 7.25, 7.27 and 7.28 of the London Plan (March 2015) and Policy DH(k) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**London City Airport’s OLS**

118. No building or structure forming part of the permanent development will exceed London City Airport’s Obstacle Limitation Surfaces (OLS).

**Reason:** In the interests of aviation safety and to ensure compliance with Policy 7.13 of the London Plan (March 2015).

**Cranes**

119. Prior to the commencement of demolition/construction of the relevant part of the development, a construction methodology statement and details of the use of cranes in relation to the location, maximum operating height and duration shall be submitted to and approved in writing by, the Local Planning Authority (in consultation with the PLA, TfL/The Emirates Airline and London City Airport). The development shall be implemented in strict accordance with the approved details.

**Reason:** In order to safeguard the general amenities of the local area, in the interests of aviation safety and of vessels navigating the River Thames and to ensure compliance with Policy 7.13 of the London Plan (March 2015).

**Restriction on occupation of Parcels 15, 16, 17, 21 and 22**

120. No development on Parcel 15, Parcel 16 (all Plots), Parcel 17 (Plot 01 and Plot 02), Parcel 21 and Parcel 22 (Plot 01 only) as shown on Drawing No. 07-072 Revision P01 shall be occupied until such time as the hazardous substances consent(s) for the East Greenwich Gasholder Station has been revoked in accordance with the provision of the Planning (Hazardous Substances) Act 1990, as amended, and written confirmation of revocation had been issued by the Hazardous Substances Authority.
Reason: The Health and Safety Executive’s advice is that there are sufficient public safety grounds for permission to be refused for these elements of the redevelopment and ensure compliance with Policy 5.22 of the London Plan (March 2015)

**Restriction on occupation of Parcel 18 (Plot 01)**

121. No development on Parcel 18 (Plot 01) which would be likely to result in children congregating in numbers (supervised or unsupervised) in open areas (ie not inside buildings), for example on sport pitches, in playgrounds or at school bus waiting points, and which is located within 375m of the centre of the gas holder at East Greenwich Gasholder Station shall be occupied until such time as the hazardous substances consent(s) for the East Greenwich Gasholder Station has been revoked in accordance with the provision of the Planning (Hazardous Substances) Act 1990, as amended, and written confirmation of revocation had been issued by the Hazardous Substances Authority.

Reason: The Health and Safety Executive’s advice is that there are sufficient public safety grounds for permission to be refused for these elements of the redevelopment and ensure compliance with Policy 5.22 of the London Plan (March 2015).

**Overheating**

122. Details derived using simulation software demonstrating that all dwellings comply with the CIBSE standard preventing summer overheating shall be submitted to and approved by the Local Planning Authority prior to the construction of the relevant part of the development. The development shall be carried out in accordance with the details as approved unless minor variations thereto are agreed in writing by the Local Planning Authority.


**Riverside Walk**

123. Details of relevant sections of the riverside walk including hard and soft landscaping, seating and lighting shall be submitted to and approved by the Local Planning Authority before the relevant part of the development is started and, once approved, that section of the riverside walk shall be implemented in accordance with such approved plans before the use is commenced. This shall include any alteration to the river walls, banks or other alterations to the river.
Reason: To ensure that the appearance of the development is satisfactory and that it contributes to the character and appearance of the area in accordance with Policy 7.5 of the London Plan (March 2015) and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

**Hydrodynamic Modelling**

124. Prior to commencement of any construction in the river Thames, hydrodynamic modelling and a navigational risk assessment shall be submitted to and approved in writing by the LPA. This should assess the impact of the proposed structures in the river, including all piles, dredging and worst case scenarios for moored vessels.

Reason: In order to safeguard the general amenities of the local area, in the interests of vessels navigating the River Thames and to ensure compliance with Policy 7.13 of the London Plan (March 2015).

**Jetty Operation and Management**

125. Prior to the commencement of development on the jetty, full details of a strategy for the operation and management of the proposed use of the jetty including an assessment on the PLA navigational equipment shall be submitted to and approved in writing by the local Planning Authority prior to use of the Jetty.

Reason: In order to safeguard the general amenities of the local area, in the interests of vessels navigating the River Thames and to ensure compliance with Policy 7.13 of the London Plan (March 2015).

**Jetty Structures**

Prior to commencement of development related to jetties, full details of the use and any structures proposed shall be submitted and approved by the Local Planning Authority in consultation with the PLA. The scheme shall thereafter be implemented in strict accordance with the approved details.

Reason: In order to safeguard the general amenities of the local area, in the interests of vessels navigating the River Thames and to ensure compliance with Policy 7.13 of the London Plan (March 2015).

**Schedule 2: Zonal Masterplan Specification**

1. All Zonal Masterplans shall conform (to the extent appropriate for the level of detail required for the ZM) to the following, unless minor variations have been otherwise agreed in writing by the Local Planning Authority:

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• The approved Parameter Plans.
• The approved Design Guidelines.
• The approved Development Specification.

2. The Zonal Masterplans will include the following: Drawings, Schedules, Visualisations, Models and Images as appropriate for that zone:

   a Plans on an Ordnance Survey Base at 1:500/1:1000/1:2000 (as appropriate) indicating the layout of the Development proposed within the relevant Development Zone (DZ) which (unless agreed otherwise in writing with the LPA) shall show as appropriate:
      i The footprint of buildings in that DZ including the spatial distribution and mix of the principal land uses. Active frontages should also be identified.
      ii An area schedule including a range of floor areas by land-use type including a maximum range.
      iii Location within Limits of Deviation (LODs) of any tall buildings, structures and features.
      iv Location (within LODs) of Public Open Space, Play Spaces and key pedestrian and cycle linkages to those spaces.
      v Confirmation of quantum of minimum residential amenity space and play space.
      vi The principles of car parking provision, including location and the anticipated maximum number of spaces.
      vii Street layout outside the plots to include principles of traffic calming measures, locations and specifications of home zones and key pedestrian and cycle linkages within the DZ, showing connections beyond the zone boundary.
      viii Public transport routes and infrastructure.
     ix Junctions of proposed roads with existing roads;
     x Integration with adjoining areas and neighbouring plots in terms of connectivity, townscape, character and permeability.
     xi Any proposed topographical changes, relating to existing and proposed contours; and
     xii Other infrastructure, including drainage and district heating network connections.

   b Cross-sections of the maximum LODs of key streets, buildings and open spaces, infrastructure interfaces and boundary conditions.

   c A visual analysis of the ZM maximum heights to include perspectives into the zone and sections, which extend beyond the application site boundary.
d Working model of key areas to be agreed by the Local Planning Authority.

3. The Zonal Masterplans will include the following: Statements and Strategies
   a Landscape strategy setting out design guidance in respect of:
      i Soft landscaping design guidance setting out:
         • General arrangements/ areas of soft landscaping;
         • Suitable planting species and planting strategy in accordance with Biodiversity Action plan priority habitat conditions
      ii Hard landscaping design setting out:
         • Pedestrian, cycle way and shared space guidance (including minimum standards on footway and cycleway widths and surface materials) which co-ordinates with existing pedestrian and cycle connections;
         • Typical design details for play space and street furniture.
   b Design statement to include where relevant:
      i An explanatory statement which provides a supporting narrative on the aspects listed at points 2a) to 2d) above including:
         • Principles relating to tall buildings (above 20 metres) to include: massing, clusters, landmarks, minimum distance between buildings.
         • Measures for dealing with infrastructure and safeguarding within that zone.
         • Phasing of development across the zone including details of infrastructure phasing where relevant.
         • Locations and minimum quantums for public and private use.
         • How the key pedestrian and cycle linkages provide access to the bus network, as far as it is known at ZM submission stage, and stations.
      ii An initial assessment of the impact of the uses and locations of open space and maximum block heights on future amenity within the Zone and on neighbouring properties including:
         • Impact on privacy;
         • Sunlight/daylight;
         • Microclimatic analysis.
         • Initial Noise Assessment to inform design mitigation strategy (In relation to the Zonal Masterplans adjacent to the VDWT (Zonal Masterplan A and E)).
         • Initial Lighting Assessment to inform the design mitigation strategy (in relation to the Zonal Masterplans adjacent to the VDWT (Zonal Masterplan A and E))
An inclusive Access Statement for each Zonal Masterplan to demonstrate compliance with the requirement for Lifetime Homes and wheelchair housing provision.

4. The Zonal Masterplans will include a Compliance Statement which demonstrates compliance with the obligations and conditions contained within this permission.

5. With the exception of the first Zonal Masterplan to be sought pursuant to this Permission, each subsequent Zonal Masterplan will specify (by way of a 'tracker' or otherwise) the quantum of development by zone approved at that date, as follows:
   (a) where no zonal masterplan has been approved for a zone, the overall quantum for that zone fixed by this permission;
   (b) where a zonal masterplan has already been approved for a zone, the quantum for that zone as more particularly set out in that approved zonal masterplan;
   (c) where some but not all reserved matters consents have been approved within a zone, the quantum as set by those reserved matters consents together with the balance of quantum within that zone pursuant to the approved zonal masterplan; or
   (d) where all reserved matters consents have been approved within a zone, the quantum as set by those consents.

3.3 Informative(s) for Application Reference 15/0716/O

1. **Uses in Central Park** - The Health and Safety Executive have not advised refusal of the Central Park element because a park already exists at this location on the peninsula. However, on a precautionary basis, they have advised that they would not encourage the introduction of new dedicated playgrounds on the gasholder station side of Central Park until the hazardous substances consent for the East Greenwich Gasholder Station has been revoked in accordance with the provision of the Planning (Hazardous Substances) Act 1990, as amended, and written confirmation of revocation had been issued by the Hazardous Substances Authority.

2. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

3. There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames
4. Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.

5. The applicant is advised of the need for a river works licence for any works in, on or over the River Thames, this includes any works to the river wall, outfalls (given the proposal to utilise previously installed gravity outfalls to the River Thames and to consider the opportunities to drain further areas of the 2015 Masterplan direct to the Thames via gravity) and/or any crane oversailing. The applicant is advised to contact the PLA’s Licensing Department to discuss this matter further (lic.app@pla.co.uk).

6. The applicant is reminded that compliance with Regulation 36(2)(b) of the Building Regulations 2010 (as amended by the Building Regulations &c. (Amendment) Regulations 2015/767) (see Condition ●) will need to be stated on the Building Regulations application to Building Control and that compliance will be confirmed at completion [of the relevant phase] of the development.

7. For the avoidance of doubt the terms Affordable Housing Rental Units, Target Rent and the Affordable Housing Intermediate Units used in this decision notice apply as set out in the Section 106 Legal Agreement dated [ ] (including any variations to it).

8. For the avoidance of doubt the extent of the Neighbourhoods referred to in respect of the Affordable Housing in condition 15 are as delineated on indicative plan 02 – 080 rev P06 Neighbourhood Densities

9. Any works proposed over Mean High Water require a river works licence from the PLA and potentially an amendment will be required to the extant Jetty at Meridian Quays. The PLA will continue to discuss this matter with the applicant.

10. Any works to the jetties will require a Licence from the PLA and hence further controls and assurances are in place through the consenting procedure which covers other matters over and above planning such as civil engineering works.
3.4 **Drawing and Documents**

3.4.1 The application drawings and supporting documents recommended for approval are set out below:


4. **Site and Surroundings**

4.1 The site occupies roughly the central section of the Greenwich Peninsula and measures approximately 79.5 hectares in area.

4.2 The majority of the site lies immediately south of the O2 which provides entertainment and retail facilities. To the west of the O2 lies the AEG Hotel which is currently under construction to provide a 21 storey 452 bed hotel including a ballroom and a 23 storey building with 100 serviced residential apartments.

4.3 To the south of the application site lies Greenwich Millennium Village (GMV) which has been developed with 1,095 residential dwellings and supporting open space, retail uses and community uses including the Millennium Primary School and health centre in Phases 1 and 2. Phases 3, 4 & 5 received planning permission in March 2012 for development with a total of 1,746 Class C3 residential units and supporting retail and business space, community uses and open space. Currently, 206 of these residential units are under construction.
4.4 To the south-west of the site are a cinema, retail and hotel facilities. To the west lies the Greenwich Peninsula West Strategic Development Location. There are two safeguarded wharves in this area – Tunnel Wharf and Victoria Deep Water Terminal (VDWT) which is an operational wharf. This area also includes various industrial and commercial premises.

4.5 Immediately to the west of the site is the Southern Gas Networks (SGN) gasholder. The gasholder has been decommissioned. However the Hazardous Substances Consent for the gasholder remains in place until the Hazardous Substances Consent for the gasholder has been revoked and therefore the site of the revised Masterplan remains subject to the Health and Safety Executive’s (HSE) consultation zones around the gasholder which influence the type of development that is allowed to be occupied in its vicinity.

4.6 The site includes extensive river frontage (approximately 2.5km).

4.7 Existing features, buildings and infrastructure on the site include the following:
- Central Park: to the centre of the Peninsula provides public amenity space.
- North Greenwich Transport Interchange (bus station, taxi rank and North Greenwich Station): the tube station provides access to the Jubilee line providing links to Central London and Stratford; the bus station provides eight bus services serving connecting to the rest of the Borough as well as Stratford, Central London and south-east London.
- The existing riverside walkway and cycleway (Thames Path) around the majority of the perimeter of the Peninsula.
- Emirates Air Line: to the east of the site links the Peninsula with the Royal Docks north of the river.
- Thames Clipper Stop: to the east of the site also provides easy access into Central London.
- A number of Jetties around the Peninsula.
- Surface car parking for North Greenwich station, adjacent to the underground station.
- Car parking for the O2: 2,200 spaces are currently provided in four car parks, three to the north of Edmund Halley Way and one to the south. Coach parking for the O2 is also provided to the south of these car parks.
- The Central Marketing Hub located to the south of Peninsula Square.
- Existing Road Network: The A102 Blackwall Tunnel Approach Road runs north to south, just west of the centre of the Peninsula with both the north-bound and south-bound Blackwall Tunnel passing beneath the western part of the site. Other roads on and around the site include Millennium Way, John Harrison Way, Edmund Halley Way, East and
West Parkside, Tunnel Avenue, Drawdock Road and Ordnance Crescent.

- Listed buildings: within Central Park lie 8 ‘workers’ cottages (70-84 River Way) which are Grade II listed and The Pilot public house which is locally listed. The southern ventilation shaft to the Blackwall Tunnel southbound and the entrance to the Blackwall Tunnel lie to the west of the site and are both Grade II listed.

4.8 The site comprises land that is part of the 2004 Greenwich Peninsula Masterplan. The site of this proposed 2015 Masterplan does not include the whole of the site that was the subject of the 2004 Masterplan. The 2015 Masterplan excludes the development already built, under construction and already permitted (and to be implemented) pursuant to various detailed consents granted since the approval of the 2004 Masterplan. These are:

- The O2 Arena and Entertainment District
- The O2 Hotel and service apartments (currently under construction)
- Ravensbourne College
- The office development at 6 Mitre Passage and 4 Pier Walk
- Peninsula Central East which has consent for 1007 residential units on Plots N0205, N0206 & N0207 and 2,194 sq.m of non-residential floor space (A1/A2/A3/A4/D1/D2 uses).
- The City Peninsula Residential Development on Plot M0102 which comprises 229 residential units. This is part of the Peninsula Riverside district which is in the south east of the 2004 Masterplan site.
- The Scape Greenwich student accommodation on Plot M0120 in the Peninsula Riverside District which comprises 280 student units.
- Plots M0101, M0117, M0115, M0114, M0116, M0103, M0104 and M0121 in the Peninsula Riverside District which have detailed consent for 1,586 residential units. These are currently under construction.
- Plot M0119 in the Peninsula Riverside District which has consent for a mixed use development comprising of 2,195m² of non-residential floorspace for A1/ A2/ A3/ B1/ D1/ D2 uses.
- The Greenwich Peninsula Low Carbon Energy Centre on part of Plot M0401 to the south west of the site.

4.9 Site levels vary across the application site from east to west where the change can be up to 4m in parts.

4.10 The site is subject to a number of physical, technical and operational constraints. The key constraints include, but are not limited to:

- The Safeguarded Wharves to the west and south west;
- Operation and flight paths of aircrafts at London City Airport;
- Health and Safety Executive Consultation Zone(s) around the East Greenwich Gas Holder and the Brenntag site;
- Victoria Deep Water Terminal (currently operational);
- Navigation restrictions within the River Thames;
- Above ground and below ground infrastructure associated with the Blackwall Tunnel;
- Proposed Silvertown Tunnel Rail link; and
- Jubilee Line Tunnels and associated underground infrastructure.

5. Background and relevant history

5.1 Prior to the approval of the 2004 Greenwich Peninsula Masterplan, the site was used for gas production until 1987 when British Gas declared the site as being surplus to requirements.

5.2 Between 1987 and 2002 various planning permissions were granted for different parts of the site for various developments. These facilitated the remediation works to a large part of the site as well as the delivery of the North Greenwich Station and Transport Interchange, the Millennium Dome (now known as the O2) and the existing highways infrastructure.

5.3 On 23rd February 2004, outline planning permission (Ref. 02/2903/O) was granted for the 2004 Greenwich Peninsula Masterplan (“The 2004 Masterplan”) subject to a Section 106 agreement and 149 planning conditions, of which Conditions 53-149 apply to the 2015 Greenwich Peninsula Masterplan Site (i.e. excluding The Dome, Arena and the Dome Waterfront Area). There are site-wide conditions and plot-specific conditions. The original outline application was accompanied by a series of application reports, including an Environmental Statement.

5.4 The 2004 Masterplan comprised the following:

- Retention, external alterations and change of use of the Millennium Dome (127,000sqm.) to provide:
  - An Arena for leisure sports and entertainment use up to 63,640sqm;
  - The Dome Waterfront (now known as the O2 Entertainment District) up to 62,000sqm comprising various uses including retail up
to 8,195sqm; food and drink up to 10,080sqm; exhibition space up to 11,760sqm; assembly, leisure, sports and entertainment space (including other Class D2 uses) up to 33,220sqm; conference centre, shows and complementary uses up to 7,380sqm;

- The construction of Dome Parking;
- The construction of Millennium Square (now known as Peninsula Square);
- A mixed use development for the remainder of the Peninsula (Southern Lands) comprising:
  - Class A1 (shops) and/or Class A2 (financial and professional services) up to 22,800 sq.m;
  - Class A3 (food and drink) up to 10,950 sq.m;
  - Class B1(a) and B1(b) (business) up to 325,000 sq.m;
  - Class B1(c) (business) up to 18,600 sq.m;
  - Class C1 (hotel) up to 60,000 sq.m;
  - Class C2 (residential institutions) up to 29,000 sq.m;
  - Class C3 (dwellings) up to 10,010 dwellings (up to 820,550 sq.m);
  - Class C3 (student accommodation) up to 3,650 sq.m;
  - Class D1 (non-residential institutions) up to 13,310 sq.m;
  - Provision of community facilities, including schools and healthcare provision;
  - Provision of open space and landscaping;
  - Transport and highway infrastructure – including car and coach parking, riverside pier, riverside walk, foot and cycleways, helipad for health and safety use;
  - Associated works including works to the river wall, rebuilding of Greenwich Pavilion, grey water treatment plant, electricity sub-station and other utility requirements and demolition of existing buildings.

5.5 Full details were submitted for the Dome Arena and the Dome Waterfront Areas at the time of the outline application. The consent also allowed up to 2,200 parking spaces to be provided for the Dome Arena and Dome Waterfront. All matters were reserved for the mixed-use element of the scheme.

5.6 The relevant site-wide and other pre-commencement conditions and S.106 obligations of the 2004 Masterplan permission have been discharged and complied with to enable construction to commence on the Greenwich Peninsula. These include the discharge of conditions and obligations relating to phasing, density, residential mix, a Masterplan Design Code, on-street car parking, Community Services Plan, Sustainability Management Plan,

5.7 The 2004 Masterplan establishes building plots with associated land uses and massing parameters together with hierarchies of open space and circulation routes. It was intended that development of different plots would be brought forward through reserved matters applications consistent with the parameters, conditions and S.106 obligations imposed upon by the 2004 permission.

The 2011 Cable Car Masterplan

5.8 In 2011 planning permission for the Cable Car Area Masterplan (CCAM) was granted (Ref. 10/3422/0 and 10/3022/F) to allow for the re-mastering of nine plots in the north-east of the Peninsula to accommodate the southern landing point and associated facilities of the Emirates Airline. This Masterplan allowed the residential, retail and commercial floorspace that was to be displaced by the Emirates Airline to be accommodated on the surrounding land within the CCAM. This was also subject to an Environmental Statement. The CCAM repeated the 2004 Masterplan adoption of building plots and established an increase in height on this part of the site up to 103m AOD (approximately 31 storeys).

Peninsula Quays 2013 Masterplan and 11 Plot Agreement

5.9 In 2013 planning permission for the Peninsula Quays Masterplan (PQ Masterplan) (Ref. 13/0684/0) was granted which related to six plots to the north-west of the Peninsula and included Plots N0601, NO602, NO607, NO608, NO504 and NO506. This was for a mixed use development consisting of Class A1-A5 (Retail) and D1/D2 (Leisure, Crèche, Community use) up to 8,256m², Class C1 (Hotel) up to 38,517m² or B1 (Business) up to 33,943m², Class C3 (Dwellings) and up to 1,683 dwellings (155,228m²). This Masterplan established a new footprint and layout of buildings and an increase in height of development in this area up to 127m AOD (approximately 38 storeys). This development has not commenced to date.

5.10 The PQ Masterplan was considered concurrent to an agreement by Members to modify the main Peninsula S104 agreement in June 2013, in respect of Plots M0101, M0103, M0104, M0114, M0115, M0116, M0117, N0601, N0602, N0607 and N0608. This was to secure changes to the current S106 agreement in respect of these 11 plots to reduce the amount of affordable housing from 38% of the units to 25% of habitable rooms or 646 homes (approximately 21% of the units) to be affordable with no affordable housing.
to be provided in plots N0601, N0602, N0607 and N0608 (known as the ‘PQ’ plots). The proposals included that all of the affordable homes would be provided by 31 December 2017 with restrictions on the number of private dwellings that could be occupied before the affordable homes are completed and leased or sold to a Registered Provider. The modified S106 agreement was signed on 8 August 2013.

Other Applications

5.11 A number of detailed planning applications have been submitted and approved at Greenwich Peninsula since the 2004 outline planning permission was granted. Those that are considered relevant are listed in the following paragraphs:

5.12 Application Reference: 10/3022/F Greenwich Cable Car. Erection of a cable car extending over the River Thames from Greenwich Peninsula to Royal Victoria Dock (LB Newham). The Cable Car is located in the centre of the CCAM on plot M0108. It consists of a two storey station, a two storey gondola storage building (including up to 296m² A1/A3/D1/D2 floor space at ground floor), an associated compression tower, public realm works to south of Edmund Halley Way and a south main tower and associated ship impact protection on the south foreshore of the River Thames. Planning permission was granted in 23rd March 2011 and the Cable Car now known as the Emirates Airline opened in May 2012.

5.13 In September 2007 full planning permission was granted for the construction of Ravensbourne College of education on Plot N0203. (Ref. 07/1238/F).

5.14 In September 2013 full planning permission was granted for the development of two office buildings, comprising one 8 storey building (approx. 25,483sq.m of office floor space & 1,229sq.m of A1-A5 uses and one 13 storey building (approx. 15,371sq.m of office space and 221sq.m of A1-A5 uses) on Plot N0204. (Ref. 07/1613/F). This development is known as 6 Mitre Passage and 4 Pier Walk.

5.15 In March 2012, Planning Permission was granted (Ref: 10/0140/F) for the development of a 21-storey, 452 bedroom hotel (maximum height of 78 metres) with ancillary accommodation including health spa, ballroom, special events space and meeting facilities, plus a 23-storey building (maximum height of 92.7 metres) with 100 serviced residential apartments, together with associated undercroft parking, servicing and landscaping on Plot N0301 to the west of the O2. The consent was subject to condition and a supplementary legal agreement, linking this consent to the obligation and community benefits.
secured in terms of the 2004 Masterplan. In August 2013, internal and external alterations as Minor Material Amendments were granted for this scheme (Ref. 13/0923/MA).

5.16 Between May 2007 and March 2014, reserved matters/full planning approval was granted for residential development on nine plots in the Peninsula Riverside I and II neighbourhoods in the south eastern area of the Peninsula, (to be known as part of the Lower Riverside Neighbourhood in terms of the proposed 2015 Masterplan), comprising Plots M0101, M0117, M0115, M0116, M0102, M0103, M0114, M0104 and M0121 totalling 1815 dwellings. Of these 229 have been built and are occupied in the City Peninsula development on Plot M0102. The remainder are under construction.

5.17 In March 2014, full planning permission was granted for 2,195 sq.m of A1/A2/A3/B1/D1/D2 uses on Plot MO119 located in the area to be known as the Lower Riverside Neighbourhood in terms of the proposed 2015 Masterplan.

5.18 On 25th February 2015 planning permission was granted for demolition of building on Plot N0205 (the Rotunda) and erection of 5 buildings comprising 1007 residential units (includes an increase of 137 units over and above the 2004 Masterplan consent figure of 10,010 dwellings) on Plots N0205, N0206 & N0207, 2,194 sq.m of non-residential floor space (A1/A2/A3/A4/D1/D2 uses), private and communal amenity space, car parking, circulation, servicing and access, public realm, hard and soft landscaping, amendments to the alignment of the Thames Path and associated works. (Ref. 14/1799/F)

5.19 In 2008 outline planning permission was granted for an additional 24,000 square metres of floorspace within the O2 Entertainment District and known as the Entertainment District Phase II consent (Ref 08/0197/O). The maximum floor area permitted in the Entertainment District the consent was 86,000 square metres.

5.20 Outline planning permission was granted in August 2013 for development of 13,500m² additional retail (Use Class A1) floorspace within the existing structure of The O2 for use in connection with a Retail Outlet Village (ROV) (Ref: 11/3033/O). The ROV reduced the maximum floorspace permitted in the O2 Entertainment District to 70,000 square metres.

5.21 On 20th April 2015, detailed reserved matters approval was granted for 15,926 sq.m retail floorspace, 3,751 sq.m of food and drink floorspace and 6,564 sq.m of associated back of house floorspace with the Entertainment District of the O2 for the ROV (now known as the Design Outlet Collection).
5.22 On 31st March 2014 full planning permission was granted for the erection of a temporary primary school building on Plots M0318 and M0319 for up to 120 pupils (expansion of St Mary Magdalene CE Primary School) with associated playground, landscaping, car parking, highway crossover and access road, pedestrian access and temporary generator for a 2 year temporary period. (Ref. 14/0468/F).

5.23 In February 2013, outline planning permission was granted for the revised plot parameters and land use in relation to Plot N0506 providing a maximum floor area of 23,947sqm of student accommodation use together with D2 (Assembly and Leisure) and A1-A5 (retail) uses up to a maximum floor area of 2,538sqm. The consent also included full planning for the infrastructure and public realm works, associated with the construction of new access routes to the O2 and O2 hotel. (Ref. 12/0590/O).

5.24 In July 2013 full planning permission was granted for the construction of a central marketing hub building on Plot N0202 comprising part 3/4 storey building with connecting roof canopy including marketing suites, associated offices accommodation together with restaurant/café and retail uses, associated hard and soft landscaping for a temporary period of 20 years.

5.25 In September 2013 full planning permission was granted for the erection of a 2,600sqm low carbon energy centre on Plot M0401, including office accommodation, visitor centre, 49m high flue stack, substation and gas governor house plus associated car parking, servicing, plant, access and landscaping.

5.26 An EIA Scoping Opinion was issued on 18 February 2015 for the proposed development.

6. Proposals

6.1 The application is a revision to the 2004 Masterplan. The proposed development is to be known as the 2015 Greenwich Peninsula Masterplan ("2015 Masterplan").

6.2 The application is submitted in outline with all matters reserved for future consideration (layout, scale, appearance, access and landscaping). A series of Parameter Plans have been submitted with the application for approval. These plans set the development parameters within which the detailed development will come forward at a later date.
6.3 Development on the site will also be controlled by the Development Specification, which builds upon the detail provided on the Parameter Plans, and by the Design Guidelines that seek to establish the key principles to ensure design quality. The Parameter Plans, Development Specification and Design Guidelines are for formal approval and will fix the land use, maximum quantum, maximum building heights, access and circulation routes, and areas of public realm for the 2015 Masterplan.

6.4 The outline consent would be subject to conditions requiring all detailed submissions for the proposed development to be in compliance with the Parameter Plans, Development Specification and Design Guidelines.

6.5 In addition, an Illustrative Scheme has been developed to assist with the assessment of the likely environment impacts of the proposed development. This assessment is set out in the Environmental Statement submitted with the application.

Parameter Plans

6.6 These plans define the general layout, circulation, maximum building heights and land uses of the development. The following parameter plans have been submitted for approval:

1. *Application Site Boundary*: The application site is outlined in red within which the development forming this application is proposed. A blue line identifies other land in the Applicant's ownership.
2. *Demolition Plan*: This identifies those buildings and structures to be demolished within the application boundary. This plan also identifies the existing site levels across the site.
3. *Development Zones*: This identifies the five development zones across the site.
4. *Ground Level Land Use Plan*: This identifies the ground floor land uses on each plot.
5. *Upper Level Land Use Plan*: This identifies the upper floor land uses on each plot.
6. *Public Realm*: This identifies the proposed public realm areas for general public access.
7. *Access and Circulation Routes*: This identifies the main vehicles and pedestrian access routes throughout the site and identifies limits of deviation where necessary.
8. *Maximum Building Heights*: This identifies the maximum building heights to which buildings could be built across each plot. This plan also identifies the proposed site levels across the site.
Development Specification

6.7 The Development Specification defines and describes the component elements of the 2015 Peninsula Masterplan to be read in conjunction with the Parameter Plans and Design Guidelines. The Development Specification sets out the following aspects of the development:

- The quantum of development for each land use proposed as Gross External Area (GEA) in square metres and by number of units proposed where applicable;
- The disposition of the different uses across the five development zones;
- A summary description of each of the five development zones;

The Design Guidelines

6.8 The design concept set out in the submitted Design and Access Statement is based on the Illustrative Scheme, not the parameter plans. The Design Guidelines are intended to manage the delivery of the development within the parameters but in a way that achieves the design aspirations discussed in the Design and Access Statement.

6.9 The Design Guidelines establish the overarching urban design elements that will guide the development. Full details of the design and external appearance of the buildings have been reserved at this stage and will be submitted for approval through the Reserved Matters applications. However, a number of design guidelines have been established as being key to the delivery of a high quality development and these will be used as the main framework for the Zonal Masterplans and subsequent Reserved Matters applications. The Design Guidelines focus on five urban design elements:

1. Neighbourhoods
2. Open Space and Landscape
3. Movement and Street Grain
4. Building Form
5. Local and Strategic Views

6.10 The Design Guidelines provide detailed guidance on the following aspects of the proposed development:

- Descriptions of the characteristics of the proposed six neighbourhoods;
- Descriptions of the proposed open space network and each of the primary open spaces;
- Descriptions of each of the proposed primary routes through the site;
- Description of the proposed hierarchy of the wider network of routes;
- Principle pedestrian and cycle routes;
- Principles for general height distribution across the site;
- Principles for the built form framing the various public realm areas and open spaces;
- General qualities of built form along typical streets;
- Guidance on the general design and placement of tall buildings within the development;
- Principles to establish active streets;
- Principles for the proposed transport interchange;
- Principles for the proposed Design District;
- Principles for the integration of the proposed film studios with surrounding development;
- Principles for the proposed AEG parking;
- Principles for the layout and massing of the residential city blocks;
- Principles for the design features of the residential buildings;
- Design mitigation for residential development affected by the adjacent Safeguarded Wharves;
- Principles for how the development will frame and enhance local views;
- Principles for how the development will have regard to strategic views;

Neighbourhoods

6.11 The proposed development is to be organised around six Neighbourhoods. Five of these are primarily residential with supporting social infrastructure. The sixth neighbourhood functions as a leisure-led district centre in the heart of the peninsula with a new Transport Interchange, local retail, commercial space, education and public space.

6.12 Each neighbourhood, will be defined by its mix and intensity of development, the urban form, building typologies and the different nature of the public realm. This will ensure that each one has a distinct character and atmosphere while also being part of the whole.

6.13 The six Neighbourhoods are distinct from the Development Zones which are described below. The following table provides a description of each Neighbourhood.
<table>
<thead>
<tr>
<th>Neighbourhood</th>
<th>Character</th>
</tr>
</thead>
</table>
| 1 Meridian Quays  | Located on the north western part of the site. Bounded by the River Thames to the west, the AEG hotel to the north and Victoria Deep Water Terminal to the south. The development will:  
• create a new high density residential neighbourhood with a strong relationship to the river.  
• create a local ‘boulevard’ forming an active route between the waterfront and Peninsula Square.  
• create a new ‘green’ link over the Blackwall Tunnel Approach and Millennium Way that connects with a new waterfront park.  
• establish a permeable street grid with a strong orientation towards the river.  
• create a building mass that gradually rises in height away from the riverfront and the new Meridian Quays Park.  
• create a new raised ground level to handle servicing                                                                                                                                                           |
| 2 Peninsula Central | Located to the south of the O2, to the east of Millennium Way and to the north of Edmund Halley Way. The development will:  
• create a vibrant leisure led District Centre with a new transport interchange and Design District.  
• develop the urban context for Peninsula Square and the O2 with complementary uses that encourage street activity throughout the day.  
• create a new Design District with small scale buildings and a fine grain of streets that encourages smaller businesses and education uses.  
• create a junction of open space in Peninsula Square to handle north south and east west routes.                                                                                                                                                                            |
| 3 Lower Riverside  | Located on the south eastern part of the site. Adjacent to the River Thames to the east, Emirates Airline to the north, Central Park to the west and the consented development under the 2004 Masterplan The development will:  
• create a lower density residential neighbourhood with a strong relationship to both the Central Park and the Thames riverfront.  
• create a permeable street grid of direct routes between Central Park and the Thames.  
• create two strong building frontages with tall buildings along Central Park and the Thames.  
• create an urban context to the Emirates Air Line cable car and park.                                                                                                                                                                                                 |
| 4 | Upper Riverside | The Development will:  
|   |   | • improve the setting of existing and permitted development in the neighbourhood by enhancing the landscape proposals and the legibility of surrounding routes.  
|   |   | • integrate existing and permitted development within a wider development strategy for the whole Peninsula.  
|   |   | • introduce residential development with non-residential ground floor uses to extend the residential provision while enhancing the street life with leisure led active uses.  
|   | Located on the north eastern part of the site, south of the O2 and adjacent to the River Thames to the east. |   |
| 5 | Upper Brickfields | The development will:  
|   |   | • create a mixed-use neighbourhood with new film studios and residential neighbourhoods.  
|   |   | • create a residential edge for Central Park that responds to the scale of Lower Parkside and takes advantage of long park views.  
|   |   | • create an urban edge to Millennium Way and devise creative ways for the film studios to address this key route without compromising the security and functionality of the film studios.  
|   |   | • work with a residential building type that can create frequent entrances and local pocket spaces facing the Central Park.  
|   | Located in the centre of the site, adjacent to Central Park to the east and the gasholder to the west. |   |
| 6 | Lower Brickfields | The development will:  
|   |   | • create a lower density residential neighbourhood with focus on family dwellings and a comprehensive school at its heart.  
|   |   | • create an urban active frontage to Millennium Way and John Harrison Way.  
|   |   | • create a permeable street network that leads to Central Park and the Thames, and facilitates movement from future development west of Millennium Way.  
|   |   | • create a strong urban frontage of lower buildings facing Central Park.  
|   | Located on the south western part of the site, adjacent to Central Park to the west and Greenwich Millennium Village to the south. |   |
The Masterplan Framework – Plots and Development Zones

6.14 The parameter plans establish 22 parcels of land arranged around the principle routes and open spaces. These parcels are further divided into 46 development plots. Each Plot has a unique number.

6.15 The Development Zones Parameter Plan and Development Specification divide the site into 5 Development Zones known as Zones A, B, C D and E. These are phases of the development for which approval will be sought at a later stage for a further layer of scheme detail to be provided within individual masterplans (Zonal Masterplans). Each of the plots, primary routes and open spaces fall within one of these Development Zones. The Neighbourhoods described above each fall into one or more of these Zones.

6.16 As set out in the Development Specification that supports this outline application, each of the Development Zones will be the subject of its own zonal masterplan, the submission of which will be secured by condition. The details to be included in these zonal masterplans will also be secured by a condition. It is intended that zonal masterplans will be submitted for approval for these Zones prior to the reserved matters applications being submitted for the various elements of the proposed development. All reserved matters applications must also be in compliance with the zonal masterplans. A condition will be attached to secure environmental assessment screening is undertaken for all zonal masterplan and reserved matters stages in order to address any potential significant environmental effects that are unable to be identified at this outline stage.

6.17 The character and identity of each Development Zone is set out in the Development Specification and is summarised below.

<table>
<thead>
<tr>
<th>Zone</th>
<th>Summary Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zone A</td>
<td>Meridian Quays (north) a residential area designed around a network of exemplary new streets and spaces; a vehicular street connecting to Peninsula Square and the River; Meridian Quays park providing a green connection to the Thames and a new jetty including a Clipper river stop. A new primary school will also be provided within Meridian Quays. Peninsula Central providing a transformed transport interchange and local retail and the widening of Central Park.</td>
</tr>
<tr>
<td>Zone B</td>
<td>Upper Brickfields will provide a diverse and varied mix of uses</td>
</tr>
</tbody>
</table>
including world class film studios. A series of residential buildings will front Central Park including local neighbourhood retail at ground floor level.

Zone C Lower Brickfields will form a family focused neighbourhood. The neighbourhood is centred around quiet pedestrian streets that lead to St Mary Magdalene C of E through school. A strong residential frontage is provided to Central Park. Also includes part of Lower Riverside.

Zone D Lower Riverside will form an extension to the residential units to the north and south. A vehicular spine connecting north to south, a landscaped residential waterfront edge and a strong residential frontage to Central Park. Upper Riverside will provide new landscaping and public realm linking Peninsula Square to the eastern riverside.

Zone E Meridian Quays (south) will provide a residential neighbourhood around a network of new streets and open spaces.

Demolition of existing buildings

6.18 The proposals include the demolition of the following existing buildings:

- North Greenwich Station and Transport Interchange
- Versatile Plant Ltd, Units 1-5 Tunnel Avenue
- Vacant Building at 271-287 Tunnel Avenue
- Peter’s Pies, 271-287 Tunnel Avenue

Proposed Uses and Quantum of Development

6.19 Parameter Plans 07-074 and 07-075 set out the proposed locations of the various uses at ground floor and upper floor level. The application proposes the following uses and quantum of development for the site:

<table>
<thead>
<tr>
<th>Development</th>
<th>Use Class</th>
<th>Floorspace proposed (GEA) sq.m</th>
<th>No. of units/rooms Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>C3</td>
<td>Up to 1,171,909</td>
<td>Up to 12,678 units</td>
</tr>
<tr>
<td>Business</td>
<td>B1</td>
<td>Up to 59,744</td>
<td>N/A</td>
</tr>
</tbody>
</table>
### Residential Accommodation (including Serviced Apartments)

<table>
<thead>
<tr>
<th>Category</th>
<th>Code</th>
<th>Units</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>A1, A2, A3, A4, A5</td>
<td>Up to 23,475</td>
<td>N/A</td>
</tr>
<tr>
<td>Hotel</td>
<td>C1</td>
<td>Up to 35,999</td>
<td>Up to 500 rooms</td>
</tr>
<tr>
<td>Serviced Apartments</td>
<td>C3</td>
<td>Up to 20,306</td>
<td>Up to 220 units</td>
</tr>
<tr>
<td>Visitor Attraction</td>
<td>D1/D2</td>
<td>Up to 19,526</td>
<td>N/A</td>
</tr>
<tr>
<td>Film Studios</td>
<td>Sui Generis</td>
<td>Up to 38,693</td>
<td>N/A</td>
</tr>
<tr>
<td>Education</td>
<td>D1</td>
<td>Up to 37,900</td>
<td>N/A</td>
</tr>
<tr>
<td>Health Care Facilities</td>
<td>D1</td>
<td>Up to 1,462</td>
<td>N/A</td>
</tr>
<tr>
<td>AEG Parking</td>
<td>Sui Generis</td>
<td>Up to 68,297</td>
<td>A minimum of 2,000 spaces</td>
</tr>
</tbody>
</table>

**TOTAL**

- A minimum of 2,000 AEG parking spaces
- Up to 12,678 residential units
- Up to 500 hotel rooms
- Up to 220 Serviced Apartments

**6.20** The 2015 Masterplan seeks permission for up to 12,678 residential units and 220 service apartments. The residential units will be distributed across the five residential Neighbourhoods. The serviced apartments will be located in the Peninsula Central neighbourhood.

**6.21** The residential units would comprise a mix of private, social and intermediate units across the Masterplan. Affordable housing would be provided within each neighbourhood and development zone and the buildings would be tenure blind. A minimum of 20% of family units will be provided within the development. The proposed mix of units will include studios, 1, 2, 3 + bedroom units within the following ranges:

- **Studio** – range 0-20% (maximum of 15% overall)
- **1-bed** – range 25-50%
- **2-bed** – range 20-40%
3bed+ - range 5-30% (minimum of 20% overall)

6.22 The application proposes that within the 2015 Masterplan area, a minimum of 2,928 affordable housing units will be provided. This would represent 22.7% of the maximum 12,878 residential units (i.e. 12,678 residential units plus 220 serviced apartments) to be delivered on the site.

6.23 The residential density for the development is 353 dwelling units per hectare.

Business Floorspace

6.24 The proposed development would provide up to 59,744 sq.m floorspace of office floorspace (B1 use). This is to be provided on two Plots in the Meridian Quays neighbourhood, opposite the transport interchange and in the Peninsula Central neighbourhood. Provision is also made for it to be provided in the upper floors of the transport interchange building and in the design district within the Peninsula Central neighbourhood.

Retail Floorspace

6.25 The planning application proposals include approximately 23,500 sq.m of floorspace to be occupied by Class A1 to A5 retail uses for retail, professional services, restaurants, bars and take-aways.

6.26 The Retail/Transport Hub in the Peninsula Central neighbourhood will accommodate about 16,900 sq.m of Class A1 to A5, about 70% of the total retail floorspace. The majority of the remaining 6,600 sq.m, around 4,700 sq.m, will be located in development blocks immediately adjacent to the Retail Hub and in the Design District. This development is within the proposed North Greenwich District Centre boundary as defined in the Core Strategy.

6.27 A small element of retail use (about 1,900 sq.m) will be provided within some of the residential development blocks in the residential neighbourhoods. These local facilities will primarily serve the day to day needs of residents and workers within Greenwich Peninsula.

Hotel

6.28 Up to 35,999 sq.m of hotel space is proposed which would provide up to 500 rooms. This would be provided around the transport hub in the Peninsula Central neighbourhood.
Visitor Attraction

6.29 The visitor attraction would be located in the Peninsula Central District. The exact nature of the attraction is unknown at this stage but examples of the type of use that could be would be a theme park, hands-on science centre or a media attraction.

Film Studios

6.30 The proposal is for up to 38,690 sq.m for an international film studio. This is a sui generis use and would be located on parcel 15, adjacent to Millennium Way in the Brickfields North neighbourhood.

Education

6.31 Up to 37,900 sq.m of D1 floorspace for education is proposed. The proposals make provision for a new ‘all-through’ school (St Mary’s Magdalene expansion) on the south of the site in the Brickfields South neighbourhood.

6.32 In addition, a new primary school is proposed within the Meridian Quays neighbourhood.

6.33 It is also proposed to provide space for an extension to Ravensbourne College within the Peninsula Central neighbourhood.

6.34 Provision of nursery facilities, as ancillary uses to the residential units is proposed within the residential neighbourhoods.

Healthcare facilities

6.35 A new health facility of up to 1,462 sq.m is to be provided in one building in the Peninsula Central neighbourhood.

AEG Parking

6.36 The existing surface car parks which serve the O2 are to be relocated to a multi-storey car park to the south of the transport interchange in the Peninsula Central neighbourhood. A pedestrian walkway will allow visitors to reach the O2 easily without having to negotiate the new bus station below. A minimum of 2,000 spaces is proposed with a maximum floorspace of 68,297 sq.m. This is to be limited 2,150 spaces by a condition.
**Height and Massing Parameters**

6.37 The Maximum Building Heights Parameter Plan (Drawing No. 07-078) sets out the maximum building heights across the 2015 Masterplan. The building heights range from approximately 5 storeys up to 40 storeys). The tallest element of the development would be within Zones A and E to the northwest of the Peninsula (Meridian Quays) stepping down towards the centre of the site at Peninsula Central and then stepping up in height again towards Upper Riverside (east). The height will also lower towards to the south of the site.

6.38 With regard to each development zone, the maximum building heights would be as follows:

Zone A: The maximum building height is +133.5m AOD (approximately 40 storeys)
Zone B: The maximum building height is +113.5m AOD (approximately 34 storeys)
Zone C: The maximum building height is +75m AOD (approximately 22 storeys)
Zone D: The maximum building height is +113.5m AOD (approximately 22 storeys)
Zone E: The maximum building height is +133.5m AOD (approximately 40 storeys)

**Inclusive Design**

6.39 The proposed development is to be designed to provide a fully inclusive environment. The following principles are to be incorporated with the detailed scheme:

- All residential units would be designed to be built to Lifetime Homes Standards.
- The residential development would be designed to comply with BS 8300:2001 Part M Building Regulations and the GLA’s ‘London Housing Design Guide’.
- Lobbies, communal corridors and dividing doors within the corridors would be designed in accordance with Part M and, where applicable, the Wheelchair Housing Design Guide.
- The design will accommodate level access for all residents, both to their homes and communal open space and to public transport nodes.
- Sustainable means of access for all people in the external landscape, approaches and public realm.
- Sustainable means of access for all people at the entrance points.
- Routes and access way sufficiently wide to allow people (including wheelchair users) to pass each other.
- Minimal use of level changes within the landscaped area, and where unavoidable, routes between levels made accessible for people unable to or who have difficulty using steps.
- Landscaped areas designed so that they are easily used by people with sensory impairments, particularly for people with sight loss.
- Principle entrances and lobbies which are easily visible on approach and accessible.
- Independent horizontal and vertical circulation that is convenient and ensures that people can make use of all relevant facilities and accommodation.

Public Realm, Open Space, Amenity Space and Children’s Play Space

6.40 Parameter Plan 07-076 - Public Realm sets out the extent of the proposed open spaces and other public realm areas of streets and principle routes.

6.41 The 2015 Masterplan proposes a range of public realm areas and open spaces which include:
- The widening of the existing Central Park at its norther end to provide a more substantial facility and to be the centre of the Peninsula for a diversity of age groups and activities and a place to walk, cycle, play and hold community events.
- A new park at Meridian Quays which would extend east across the A102 via a green bridge connecting directly to the new and expanded transport interchange in Peninsula Central.
- A new riverside public open space at Meridian Quays.
- A new public open space in Upper Riverside to link Peninsula Square with the eastern riverfront
- Retention of the existing Peninsula Square
- Retention of the existing Emirates Air Line Park in Lower Riverside
- Improving the riverfront and the riverside walkway
- Re-activating the jetties for mooring points and water based activities.
- A public 5km running track around the perimeter of the Peninsula.
- A new direct east-west route from Peninsula Square to the Meridian Quays riverside.
- A public pedestrian route through the transport interchange from Peninsula Square to the new Meridian Quays park.
- An enhanced route linking Peninsula Square to the Emirates Airline.
- Two north/south routes linking Central Park through the Design District to Peninsula Square.
6.42 It is also proposed that, where practicable and appropriate, all residential units would have access to a private amenity area and there would be communal amenity areas for all residential plots at ground and/or upper floor levels.

6.43 New children’s play space is to be provided in accordance with the Mayor’s Supplementary Planning Guidance ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation’ (September 2012).

Transport Infrastructure, Access, Parking and Servicing

6.44 The scheme proposes the following new and enhanced transport infrastructure:

- A new layout and enlarged bus station at North Greenwich Interchange to improve circulation, movement and capacity of buses;
- An increase in the number of bus stops (11 stops instead of 7);
- More alighting stops (space for 4 buses instead of 3.)
- Additional bus stands (space for 17 instead of 15)
- An increase in the capacity of the taxi rank and private hire pick up.
- The connection of the central hub and transport interchange with direct cycle routes with the wider network
- A new Jetty on the west side of the Peninsula
- More direct bus routes into and out of the Peninsula. This includes the re-alignment of West Parkside to form a direct junction with the access to the bus station across Edmund Halley Way.
- Relocation and consolidation of the O2 car park to provide quick access and minimise the conflict with the bus services
- A cycle Superhub within the Transport Hub
- An increase in secure cycle parking facilities

6.45 Parameter Plan 07-077 – Access and Circulation Routes - sets out the hierarchy of key access and circulation routes around the site for vehicles, cycles and pedestrians.

6.46 In addition to the minimum of 2000 parking spaces to be relocated for AEG, residential parking would be provided at a ratio of up to 0.25 car parking spaces per unit. Visitor parking would be provided on street (200 spaces) and up to 100 car parking spaces for the film studios would be provided. Parking associated with the offices, visitor attraction, social infrastructure, retail will be car free or kept to a minimum due to its location in a District Centre.
6.47 Cycle parking is to be provided for the residential development in accordance with the relevant standards.

6.48 New coach parking associated with The O2 is also re-provided with a 37 space coach park proposed to the west of the proposed multi-storey car park.

6.49 Servicing of the development would be from on-street via the highway network as well as from the links between the plots at ground level.

**Energy and Sustainability**

6.50 It is proposed that the development would connect to the Greenwich Peninsula Low Carbon Energy Centre the Peninsula which is currently being constructed to the south of the site. Temporary energy centres will be implemented initially to serve the plots completed before the Energy Centre is operational.

6.51 Overall, the stated energy saving measures will contribute to a 35% carbon emissions improvement over Part L 2013 reduction, without accounting for the savings from renewable energy technologies.

6.52 The proposed development indicates that all residential units will seek to achieve, as a minimum, a Code for Sustainable Homes Level 4 rating.

5.53 It is proposed that all new non-domestic buildings above 500m² will seek to achieve, as a minimum, a BREEAM Very Good rating.

**Phasing and Masterplan Zones**

6.54 As described above, the Development Zone Parameter Plan (Drawing No. 07-072) establishes development zones across the application site. These are phases of the development for which approval will be sought for a further layer of scheme detail to be provided within individual masterplans known as zonal masterplans. A ‘specification’ for what each Zonal Masterplan application will include is to be secured by condition.

6.55 Phasing of the development would follow the Development Zone Parameter Plan (07-072). At this stage, no proposed phasing sequence has been included. Submission of phasing details is to be secured via a planning condition.
6.56 Whilst a maximum quantum of development is being applied for across the entire site, in order to provide additional control and certainty, that quantum is further defined on a Development Zone basis by floorspace (GEA sq.m) or maximum no. of units/bedrooms whichever is the greater. The following Table has been included in the Development Specification and sets out the maximum quantum of development proposed for each Zone.

<table>
<thead>
<tr>
<th>Proposed Use</th>
<th>GEA (sq.m) of Number of units/rooms</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A</td>
<td>B</td>
<td>C</td>
<td>D</td>
<td>E</td>
<td></td>
</tr>
<tr>
<td>Residential (Use Class C3)</td>
<td>Up to 467,232 or 5,055 units</td>
<td>Up to 106,500 or 1,152 units</td>
<td>Up to 14,514 or 2,321 units</td>
<td>Up to 213,196 or 2,306 units</td>
<td>Up to 170,467 or 1,844 units</td>
<td>Up to 1,171,909 or 12,678 units</td>
</tr>
<tr>
<td>Business (Use Class B1)</td>
<td>Up to 46,563</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 13,181</td>
<td>N/A</td>
<td>Up to 59,744</td>
</tr>
<tr>
<td>Retail (Use Class A1-A5)</td>
<td>Up to 21,574</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 1,851</td>
<td>Up to 50</td>
<td>Up to 23,475</td>
</tr>
<tr>
<td>Hotel (Use Class C1)</td>
<td>Up to 35,999 or 500 rooms</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 35,999 or up to 500 rooms</td>
</tr>
<tr>
<td>Serviced Apartments (Use Class C3)</td>
<td>Up to 20,306 or 220 units</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 20,306 or 220 units</td>
</tr>
<tr>
<td>Visitor Attraction (Use Class D1/D2)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 19,526</td>
</tr>
<tr>
<td>Film Studios (Sui-Generis)</td>
<td>N/A</td>
<td>Up to 38,693</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 38,693</td>
</tr>
<tr>
<td>Education (Use Class D1 Use)</td>
<td>Up to 4,189</td>
<td>N/A</td>
<td>Up to 22,372</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 37,900</td>
</tr>
<tr>
<td>Health Facilities (Use Class D1)</td>
<td>Up to 1,462</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Up to 1,462</td>
</tr>
<tr>
<td>AEG Car Parking</td>
<td>A minimum of 68,297</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>A minimum of 68,297</td>
</tr>
<tr>
<td>Total Floorspace Applied</td>
<td>Up to 665,622</td>
<td>Up to 145,193</td>
<td>Up to 236,886</td>
<td>Up to 259,093</td>
<td>Up to 170,517</td>
<td>Up to 1,477,311</td>
</tr>
</tbody>
</table>
7. Consultation

Pre-application consultation:

7.1 The planning application was submitted following extensive consultation by the applicant with many stakeholders including Royal Greenwich Officers (through pre-application meetings and a series of workshops), the Greater London Authority (GLA), the Design Council, the Environment Agency (EA), the Port of London Authority (PLA), Transport for London (TfL), City Airport and London Underground Limited (LUL). Two stages of public consultation over three days have also taken place in December 2014 and January 2015. The Statement of Community Engagement and the Design and Access Statement submitted with the application set out the feedback received through the consultation process, and how this has influenced the 2015 Masterplan.

7.2 In March 2015 consultation was undertaken which included statutory bodies and local amenity groups, together with 7,917 individual letters of notification being sent to surrounding occupiers of which 4,743 went to properties in Greenwich, 3,160 went to properties in Tower Hamlets and 14 to properties in Newham, as well as press and site notices.

7.3 The applicant submitted amendments to the scheme and a second round of consultation was undertaken in July 2015 which included statutory bodies and local amenity groups, together with 7,947 individual letters of notification being sent to surrounding occupiers of which 4,773 went to properties in Greenwich, 3,160 went to properties in Tower Hamlets and 14 to properties in Newham, as well as press and site notices.

7.4 The following responses have been received. The officer’s replies to the comments are in italics.

Statutory Consultees:

7.5 Greater London Authority

Comments dated 1 May 2015:

London Plan policies on Opportunity Areas, employment, town centres, housing, affordable housing, play space, urban design, tall buildings, inclusive design, sustainable development, urban greening, flooding, waste, air quality and transport are relevant to this application. While the principle of the development is generally supported subject to the submission of details set
out in this report, there are some outstanding issues that need to be resolved and these are set out below:

- **Principle of development:** Given the peninsula’s Opportunity Area status within the London Plan, the principle of the large scale mixed-use redevelopment of Greenwich Peninsula that would deliver a significant number of homes and jobs is supported. Furthermore, given the minimum housing target of 13,500 set out within the Opportunity Area guidance in the London Plan and the Peninsula’s strategic role as a major contributor towards meeting London’s need for additional housing, the proposed residential intensification of the site is supported, subject to the outline application successfully securing the highest quality of urban and residential design, generous open space provision and an increase in the quantum of affordable housing to be provided.

- **Loss of employment floorspace:** The principle of the proposed reduction in office floorspace is considered acceptable as it has been demonstrated that this will not have a detrimental impact on current forecasts for the demand of office floor space in East London or the capital as a whole. Furthermore, the masterplan adopts an alternative employment strategy that builds upon the peninsula’s established leisure, retail and digital economies and the introduction of a new film studio and visitor attraction at the centre of the site and has the potential to directly and indirectly deliver approximately 12,132 full-time jobs. This is welcomed and is a positive contribution when considered against the strategic aspirations of the Opportunity Area to deliver a minimum of 7,000 jobs and the Council’s overall target of 21,000 jobs identified in the core strategy.

- **Film studio:** While the provision of a film studio is strongly supported, further information is required in order to ensure this will be a sustainable facility. The applicant is strongly advised to engage with London’s strategic film agency, Film London for further specialist advise.

- **Retail impact on Town Centres:** The London Plan identifies that North Greenwich could be re-classified as a District Centre over the plan period and this is reflected in the Council’s Core Strategy. In agreement with the Council, the applicant has carried out a proportionate retail impact assessment. This demonstrates that while the cumulative impact of the proposed and already committed retail development would draw some trade from nearby town centres, this would be adequately offset by the projected growth in population and associated expenditure in these areas as to not impact on their overall vitality and viability and that there
would be sufficient expenditure capacity as to not jeopardise existing or planned investments. However, given that the potential quantum of retail floorspace to be delivered is towards the upper limit for district centres and that the outline permission for the O2 Arena provides additional net surplus retail capacity, significant strategic concerns would be raised if this limit were to be breached in the future. The Council should satisfy itself of the robustness of this study and further discussion around the phasing of the retail development is required.

• **Safeguarded Wharves**: The Council should secure a condition requiring that all reserved matters applications for developments adjacent to, or within the line-of-sight of the safeguarded wharves should demonstrate how they will successfully mitigate against any associated environmental impacts, so as to not prejudice their future operation in accordance with London Plan Policy 7.26.

• **Housing**: The revised proposals seek to deliver 12,678 residential units which is a significant contribution towards the minimum housing target of 13,500 set out within the Opportunity Area guidance in the London Plan and is welcomed subject to the masterplan securing the other necessary mitigation measures outlined in this report. With regards to unit mix the applicant should ensure each neighbourhood zone will promote a genuine choice of all unit types in accordance with the aspirations of London Plan Policy 3.8.

• **Affordable housing**: Discussions are still ongoing with regards to affordable housing and at present an offer has not been presented. However, the GLA are of the expectation that there is an increased provision in the quantity of affordable housing over the existing 2004 masterplan consent and further negotiation and discussion with the applicant and the Council is strongly encouraged with regards to this issue. The applicant has committed to providing a financial viability appraisal for review, which is welcomed in accordance with London Plan Policy 3.12.

• **Children's play space**: GLA officers are content that based on the illustrative masterplan proposals modelled in the design and access statement, it has been demonstrated that the outline stage of the scheme can meet and exceed the on-site play provisions required by the SPG and is in general accordance with London Plan Policy. In addition to requirements in the development specification, a play space strategy detailing the minimum requirement and quantum of play space to be provided within the subject neighbourhood zone should also be required.
to confirm that each neighbourhood can meet the recreational needs of its future population.

- **Residential density**: In the context of the masterplan aspirations, the approved residential densities of schemes elsewhere on the peninsula and the site's location within an identified Opportunity Area, subject to the issues raised within this report being addressed, particularly those regarding design and transport, the proposed residential densities are generally supported.

- **Urban design**: The applicant’s early engagement with the GLA and the collaborative approach to design taken thus far is strongly welcomed and the principles moves regarding the height strategy, open space provision and principles established in the design guidelines are generally supported. The applicant should however address those comments raised in paragraphs 73 to 94 above.

- **Inclusive design**: The Masterplan recognises the requirement to design inclusively and addresses many of the issues relating to the creation of lifetime neighbourhoods. However, the applicant is recommended to secure these principles within the design guidelines for the Masterplan to ensure it develops in conformity with London Plan Policy 7.1.

- **Sustainable development**: The carbon reductions have been calculated using benchmarks rather than Part L modelling and therefore it is not possible to carry out an accurate assessment against London Plan policy at this stage. The savings should be revised accordingly and the comments above addressed and suggest conditions secured before the savings and compliance with London Plan energy policy can be verified.

- **Flood risk and drainage**: The outline proposals are in accordance with London Plan policy regarding flood risk and drainage.

- **Air quality**: Given the outline nature of the application it is appreciated that many details are not available at this stage. However, the overall development is not air quality neutral and further offsetting and onsite mitigation measures must be secured and implemented within the more detailed design stages.

**Waste management**: The commitment to develop an onsite waste management plan for the site and to provide suitable waste and recycling storage facilities within the individual housing units is strongly welcomed. The applicant should however, commit to meeting the Mayor’s construction waste...
recycling targets and explore the feasibility and appropriateness of underground vacuum waste and recycling collection systems and the opportunity to provide heat and power and cooling from waste generated from the development, in accordance with the above comments.

• **Transport:** Strategic transport modelling must be completed in order to inform the necessary transport mitigation measures that are likely to be required and secured in order for the development to be acceptable. A principal concern is how the additional homes will impact on the Jubilee Line and a greater reliance on buses to serve the peninsula. Further detailed discussion with Transport for London is required regarding the issues outlined in paragraphs 111 to 126 of this report and Appendix one.

*Comments dated 21 August 2015:*

**Film studio** – The applicant has provided a breakdown of floorspace within the studio which has been shared with the GLA Culture team for further comment. This is welcomed as is the copy of correspondence from the British Film Commission supporting the proposed studio. Any further responses from internal consultation will be forwarded w/c 31 Aug.

**Retail impact** - The retail impact assessment was accepted in principle at the consultation stage and the GLA welcomes the further information on the phasing strategy in relation to retail impact. No further comments are provided at this stage.

**Safeguarded wharves** – The approach agreed between the applicant and the PLA to adopt a similar set of conditions as those agreed on the GMV development would also be supported by the GLA. Further discussion and clarification is sought with regards to how the requirement for such conditions will be secured at the outline application stage given the strategic protection afforded to the wharves (as set out in para. 45 of the stage one report).

**Affordable housing** – This is subject to further internal discussion with GLA Housing and Land and in accordance with comments made at the initial consultation, GLA officer’s look forward to receiving further information on the outcome of the Council’s independent assessment of the supporting FVA. Notwithstanding this, the GLA seek assurance that an affordable housing review mechanism is secured that is adequate and fit for purpose. Further continued discussions are welcomed regarding this point as these negotiations progress.
**Residential quality** – As set out in para 59 of the stage one report, the applicant should make specific references to future residential development securing the good practice standards in the Mayor’s Housing SPG such as minimum unit sizes, minimum private amenity space provision, floor to ceiling heights, unit aspect, and outlook within the design guidelines. This is particularly important, as this will establish residential quality and strategic policy aspirations at the highest level, which will then influence all other stages of design. This has not been responded to.

The proposed conditions in relation to the Blackwall tunnel vent shaft are welcomed.

**Play space** – It is understood that Zonal Masterplans will include the provision of a play space strategy detailing minimum requirement and quantum of play space to be provided. This has been referenced in the design spec which is welcomed.

**Education** – The further breakdown in capacity is welcomed. Additional information on the timing/phasing with the wider residential is welcomed to ensure growth in demand equals capacity.

**Urban design** – The additional commentary on the role of smaller scale buildings is welcomed and officers strongly agree with the view that the role of small buildings can provide valuable urban qualities which taller buildings cannot, help reinforce a finer urban grain and provide a diverse townscape. Given the proposed scale of buildings across the Masterplan, the overarching design principles should make reference to this important role as set out in the DAS addendum. Is it intended that this commentary is added to the guidelines?

The additional information/narrative on soft landscaping opportunities is welcomed. Is it intended that the text and illustrations are included within the DAS/guidelines?

**Inclusive design** – Response to be reviewed internally. Again, is the commentary on pages 16-17 of DAS addendum to be substituted into application docs?

**Energy** – see response to stage one issues below:

As set out in the stage one, there should be a few conditions included for the reserve matters applications. These relate to:
• Both domestic and non-domestic elements of the development shall be designed to meet Part L 2013 criterion 1 target carbon emissions through fabric energy efficiency measures alone.
• Meeting the 35% target using Part L 2013 compliant software.
• Overheating study is carried out once the design is sufficiently developed. The study should demonstrate that dwellings are not at risk of overheating (following CIBSE guidance TM52 and TM49).

Paras 106 & 113 - 106 …it is noted that the savings have been calculated using CIBSE benchmarks rather than Part L modelling. The applicant should provide sample modelling using Part L 2013, for example typical units, to support the savings claimed and further information on how the 5% carbon improvement for the energy efficiency measures was estimated given that these figures are benchmarks. This exercise should also be carried out the savings from CHP. The applicant should commit to meeting Part L 2013 by efficiency measures alone.

The applicant has stated that Part L modelling has not been undertaken due to the application being at outline stage and there being limited detail available i.e. no internal layouts or façade mark ups. It is acknowledge that at outline stage Part L modelling is not always appropriate due to the level of detail available. However, the applicant should still explain how the 5% improvement through energy efficiency measures was determined, this is particularly important as this improvement represents a large saving in terms of tonnes of carbon emission given the scale of the development. In addition, depending on the final façade build-up/construction, the level of performance could potentially be a challenging target to meet and there is concern that the savings through the energy efficiency measures may not be met. The applicant should therefore provide further information on how the 5% improvement was estimated and commit to meeting this level of performance proposed.

109 The applicant has provided details of the plant to be located in the LCEC, which includes CHP and gas boilers. The carbon emission content of the network used for the modelling was 0.124 kgCO2/kWh based on information provided by Pinnacle Power. The applicant should provide details of how this carbon emission figure was estimated, including whether the above figure accounts for losses in the distribution network.

The applicant has provided a document on the carbon intensity of the network prepared by engineers Ramboll on behalf of Pinnacle Power (the
network operator) which confirms the carbon intensity used. The document also works under the assumption that the heat losses will be 5% based on SAP default values and this has been included for in the carbon emission factor used to calculate the savings from connection to the network. It should be noted that this standardised figure can only be used if certain criteria is met. Therefore, as the design progresses the applicant should review whether this approach is appropriate for the development. Given the scale of the heat network, site specific calculations for heat loss of the network should be included in the carbon emission calculations for the reserved matters applications, this should include any secondary networks to the blocks.

114 Notwithstanding the above, a planning condition should be secured requiring the applicant to submit an energy statement for each reserved matters application that demonstrates compliance with London Plan energy policies using detailed Part L compliant modelling rather than benchmarks. This should require that both the domestic and non-domestic elements of the development shall be designed to meet Part L 2013 criterion 1 target carbon emissions through fabric energy efficiency measures alone.

115 Furthermore, in order to assess compliance with London Plan Policy 5.9, the submission of an overheating study that accords with CIBSE guidance TM52 and TM49 to demonstrate that dwellings are not at risk of overheating for each reserved matters application should be secured by condition.

The applicant has agreed to the inclusion of a condition, subject to suitable wording.

Residential Quality: The Design Guidelines have been updated to address this point. Specific references to the actual requirements in the SPG have not been referred to as the Design Guidelines need to be flexible to adapt to changing policy over a 20 year period.

Urban Design: The Design Guidelines have been updated to address these points.

Inclusive Design: The Design Guidelines have been updated to address this point.

Energy: Regarding the Part L modelling, the applicant has advised that the estimate of 5% improvement over Part L 2013 from passive design and energy efficiency is based on Meinhardt’s experience on other comparable schemes in terms of housing typologies where, subject to an efficient architectural design, several specifications should enable to exceed compliance with Part L 2013; The applicant has provided
the assurance that a significant amount of work will be undertaken at Reserved Matters application stage to ensure that the dwellings and non-residential buildings will be energy efficient.

Energy: Regarding the carbon emission content of the network, percentage losses in the network will vary, rising when main infrastructure is installed and falling when buildings come on line. It is proposed that a heat loss calculation for the site network is submitted with the first reserved matters application, when the design is suitably progressed, which is representative of the full build out. The calculation of the secondary network heat loss for each building would be submitted with each of the reserved matters applications.

7.6 Transport for London (TfL)

Comments dated 16th April 2014

The original Masterplan approved on 23rd February 2004 for Greenwich Peninsula included a range of proposed mitigation through a s.106 agreement to support a mixed use development, including 10,000 new homes and the use of the Dome as a new arena venue having a maximum capacity of 26,000 people. The Dome, now the 02, the 02 hotel and associated uses, together with together with those sites on the peninsula that have been approved or are in the process of being developed are excluded from the current revised Masterplan submission.

Transport for London (TfL) have therefore recognised The 2004 Masterplan approval as representing an existing planning permission against which the new, revised proposal are to be considered.

The site is well served by public transport at North Greenwich with access to the Jubilee Line and eight bus services (three of which operate a 24 hour service) operating form the North Greenwich Bus station. There is an existing taxi rank which provides a high quality interchange at North Greenwich. In addition Thames Clippers and the Emirates Airline also serve the Peninsula. The access to the public transport network is within a reasonable walk distance either directly to North Greenwich Interchange, which is the most accessible location on the Peninsula scoring a 6 on a scale of 1-6 where 6 is the most accessible location. The least accessible location is towards the south west corner of the site.

TfL’s initial review of the application and accompanying documents has focussed on the transport implications arising from these new proposals. Further comments have also been made in the TfL pre-application letter which is included in the applicant’s submission which provides additional detail to that as expressed below.
Strategic Modelling – London Plan policy 6.1 Strategic Approach looks to achieve a closer integration of transport and development. Similarly policy 6.3, assessing effects of development on transport capacity requires a fully assessment of the impacts on the transport network arising from development and where existing transport capacity. WSP working on behalf of Knight Dragon have undertaken the strategic modelling covering the morning and evening peak periods for the base (current) year and end state (2031). The development assumptions including population and employment have been modelled by WSP using TfL’s strategic demand model – LTS. The scenarios modelled in LTS have included all land uses and the lower car parking ratio. LTS has provided the demand forecasts as a result of the development proposals which will inform the future year public transport (Railplan) and Highway (River Crossings Highway Assignment Model).

Whilst WSP and TfL have worked closely on the strategic models, TfL have not provided sign off of the Highway (RXHAM) or the public transport (Railplan) base year or future year models. WSP and TfL agreed that the strategic modelling work would continue post planning application submission.

TfL will expect the Strategic Modelling to be completed, approved and signed off prior to any decision on the application being made particularly as it is only when the outcome of the modelling has been completed can there be a discussion on any highway junction works or public transport mitigation measures necessary to mitigate the impact of the development.

A review has been undertaken on the strategic modelling presented within the planning application. However, the outputs are not deemed to be reliable as TfL has yet to undertake a technical review of the modelling files.

Greenwich Peninsula 2015 Masterplan: Transport Assessment and Travel Plan
– In respect of the Strategic Analysis and how this is reviewed against the Transport Assessment and Travel Plan and comments are provided on sections of the report below:

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5.1</td>
<td>Whilst WSP and TfL have worked closely on the strategic models, TfL have not provided sign off of the Highway (RXHAM) or the public transport (Railplan) base year or future year models. WSP and TfL agreed that the strategic modelling work would continue post planning application submission.</td>
</tr>
<tr>
<td>9.3.4</td>
<td>The report should set out the assumptions for the Silvertown Tunnel sensitivity test.</td>
</tr>
<tr>
<td>10.3</td>
<td>The key findings presented are based on models not signed off by TfL. Therefore outputs cannot be deemed reliable.</td>
</tr>
</tbody>
</table>
10.3.1 (bullet 2) Should consider whether the small increases in traffic levels have an impact on the wider highway network. The question is whether there are increases in journey times, delay, queuing across the network as a result of the increased traffic generated by the development on the Greenwich Peninsula?

10.3.2 (bullet 3) As these junctions are already at capacity, an increase in traffic levels will have an impact on the highway network. These junctions should be considered in the wider assessment.

10.3.2 (bullet 5) The applicant will need to set out what the Silvertown Tunnel assumptions are.

11.3 The key findings presented are based on models not signed off by TfL. Therefore outputs cannot be deemed reliable.

11.3.2 Jubilee Line crowding is already an issue and is forecast to continue in 2031. The additional crowding on Jubilee Line services is considered an issue. Consideration needs to be given as to whether the substantial increase in bus travel is because people cannot board services at North Greenwich Station. Consideration should also be given to what happens when there is an event at the O2 – what impact does this have on public transport in the area.

11.3.3 There is an increase in residential floorspace in the new Masterplan. Consideration needs to be made of what impact residential trips have to and from the area.

11.3.4 Jubilee Line crowding is already an issue and is forecast to continue in 2031. The additional crowding on Jubilee Line services is considered an issue. Consideration needs to be given as to whether the substantial increase in bus travel is because people cannot board services at North Greenwich Station.

11.3.6 Jubilee Line crowding is already an issue and is forecast to continue in 2031. The additional crowding on Jubilee Line services is considered an issue. Consideration needs to be given as to whether the substantial increase in bus travel is because people cannot board services at North Greenwich Station. There is an increase in residential floorspace in the new Masterplan. Consideration needs to be made of what impact residential trips have to and from the area.

11.3.7 Given the above TfL cannot agree that the London Underground (LU) and National Rail networks would be largely unaffected by the proposed development.

15.5 The impact assessment is based on strategic transport models not signed off by TfL. Therefore outputs cannot be deemed reliable.

15.5.1 (bullet 1) Should consider whether higher traffic flows have an impact on the overall highway network. Are there increases in journey times, delay, queuing across the network as a result of the increased traffic...
generated by the development on the Greenwich Peninsula?

| 15.5.1 (bullet 3) | As these junctions are already at capacity, an increase in traffic levels will have an impact on the highway network. These junctions should be considered in the overall assessment. |
| 15.5.1 (bullet 4) | TfL have not previously had sight of the future year strategic modelling outputs. Therefore, TfL would recommend further discussion and engagement on the highway mitigations required to support the development. |
| 15.5.1 (bullet 5) | The report should set out the assumptions for the Silvertown Tunnel sensitivity test. |
| 15.5.2 (bullet 1) | Jubilee Line crowding is already an issue and is forecast to continue in 2031. The additional crowding on Jubilee Line services is considered an issue. Consideration needs to be given as to whether the substantial increase in bus travel is because people cannot board services at North Greenwich Station. |
| 15.5.2 | TfL have not previously had sight of the future year strategic modelling outputs. Therefore, TfL would recommend further discussion and engagement on the public transport mitigations required to support the development. |
| 15.6.2 | TfL would recommend further discussion and engagement on the transport mitigations required to support the development. |

**Part 7 Transport Assessment (LTS Trip Generation Comparison p.73 onwards)** – The LTS trip generation methodology has been agreed between TfL and WSP. However, TfL have raised concerns that there is such a large difference between the LTS PM peak trip destinations and WSPs PM peak trip destinations. In an email dated 6 February 2015m TfL recommended that WSP proceed with the assessment but undertake a sensitivity test using the LTS derived numbers for PM peak trip destinations in order to understand the differences. This would highlight whether there were any significant changes and then TfL/WSP could do some further work to understand the differences.

This sensitivity test has not yet been carried out by WSP. TfL advised that this sensitivity test should not hold up the work required for the planning application. WSP sets out in “Part 8 Transport Assessment – Highway Assessment – Technical Note” that this sensitivity test will be carried out post planning application submission.

**Part 8 Transport Assessment Appendix E - Highway Assessment Technical Note** – Whilst WSP and TfL have worked closely on the strategic models, TfL have not provided sign off of the Highway (RXHAM) base year or future year.
models. WSP and TfL agreed that the strategic modelling work would continue post planning application submission.

TfL’s Strategic Analysis team has reviewed the Highway Assessment Technical Note and comments are provided on sections of the report below.

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Comments</th>
</tr>
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<tbody>
<tr>
<td>2.1.7</td>
<td>Whilst WSP and TfL have worked closely on the strategic models, TfL have not provided sign off of the Highway (RXHAM) base year or future year models. WSP and TfL agreed that the strategic modelling work would continue post planning application submission.</td>
</tr>
<tr>
<td>4</td>
<td>TfL have not previously had sight of the future year strategic modelling outputs. The impact assessment is based on strategic transport models not signed off by TfL. Therefore outputs cannot be deemed reliable.</td>
</tr>
<tr>
<td>4.2.2 (bullet 1)</td>
<td>There is a significant increase in traffic flow on these links. Need to discuss whether the network can cope.</td>
</tr>
<tr>
<td>4.2.7 (bullet 1)</td>
<td>There is a significant increase in traffic flow on these links. There is a need to discuss with Royal Greenwich whether the network can cope.</td>
</tr>
<tr>
<td>4.3.5</td>
<td>Need explanation has to why there has been a reduction in the number of junctions at capacity as this seems odd considering the development proposed.</td>
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<tr>
<td>4.3.8</td>
<td>Need explanation as to why there has been a reduction in the number of junctions at capacity as this seems odd considering the development proposed.</td>
</tr>
<tr>
<td>5.2.2 (bullet 1)</td>
<td>Need explanation as to why the roads are forecast to have lower traffic levels with the proposed development.</td>
</tr>
<tr>
<td>5.2.2 (bullet 2)</td>
<td>Need explanation as to why Millennium Way is forecast to have lower traffic levels with the proposed development.</td>
</tr>
<tr>
<td>5.2.2 (remaining bullets)</td>
<td>Where there are increases in traffic flows need to explain if links have capacity to cope with additional traffic.</td>
</tr>
<tr>
<td>5.2.7 (bullet 1)</td>
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</table>
Part 9 Transport Assessment – Appendix E – Highway Technical Note
continuation - Recommend including a table to set out what every model plot is showing. All plots should be labelled with measure (i.e. flow, v/c etc.), scenarios and year.

Part 10 Transport Assessment – Appendix F – Public Transport Assessment – Technical Note – Whilst WSP and TfL have worked closely on the strategic models, TfL have not provided sign off of the public transport (Railplan) base year or future year models. WSP and TfL agreed that the strategic modelling work would continue post planning application submission.

TfL’s Strategic Analysis team has reviewed the Public Transport Assessment Technical Note and comments are provided on sections of the report below.

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Comments</th>
</tr>
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<tbody>
<tr>
<td>1.1.4</td>
<td>Whilst WSP and TfL have worked closely on the strategic models, TfL have not provided sign off of the public transport (Railplan) base year or future year models. Therefore, TfL would recommend further discussion and engagement on the highway mitigations required to support the development.</td>
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</table>

Recommend including a table to set out what every model plot is showing. All plots should be labelled with measure (i.e. flow, v/c etc.), scenarios and year.
base year or future year models. WSP and TfL agreed that the strategic modelling work would continue post planning application submission.

<table>
<thead>
<tr>
<th>4.2.2</th>
<th>TfL have not previously had sight of the future year strategic modelling outputs. Therefore, TfL would recommend further discussion and engagement on the public transport modelling outputs.</th>
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<tbody>
<tr>
<td>4.2.5</td>
<td>TfL would recommend further discussion and engagement on the public transport modelling outputs. Jubilee Line crowding is already an issue and is forecast to continue in 2031. The additional crowding on Jubilee Line services is considered an issue. Consideration needs to be given as to whether the substantial increase in bus travel is because people cannot board services at North Greenwich Station.</td>
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<tr>
<td>4.2.9</td>
<td>TfL would recommend further discussion and engagement on the public transport modelling outputs and the proposed mitigations.</td>
</tr>
<tr>
<td>Appendix G</td>
<td>Consideration needs to be given of the station capacity when there is an event at The O2.</td>
</tr>
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</table>

It must be noted that the following comments are based on the information as submitted and may need to be revisited following the conclusion and sign off by TfL of the strategic modelling. The following comments should therefore be read based on this understanding.

**Transport Interchange** - The proposed transport interchange is a significant change on the Peninsula. In discussion with the applicant’s TfL have sought to ensure that the new transport hub provides no lesser interchange than exists at present. The current bus / underground interchange has one of the highest customer satisfaction scores on the network and any new interchange should deliver a similar customer experience. There are no proposals to change the existing escalators which descend from the current concourse to the London Underground (LU) ticket hall however the environment around the LU escalators will change (additional LU comments below). It will be important that the wayfinding to the station and through the new interchange provides customers with a legible approach to the LU entrance. TfL must be able to
influence the wayfinding design to ensure a consistency across the TfL network and directional signage to the bus station, new taxi rank, private hire pick up and drop off area, Riverbus services and the Emirates Airline.

The proposed relocation of the bus station and the principal of the bus station design has been discussed with TfL. The current bus station is at its operational limit and the proposals will deliver a larger bus station with additional needed capacity. The proposals still provides a good interchange with LU.

It is anticipated that the detailed design of the bus station, which will also need to provide driver facilities and information points delivered through a separate development agreement secured through a s.106 agreement. The development agreement would set out TfL’s design requirements and terms on which hand over of the bus station and the bus driver facilities, information points etc. will be accepted by TfL.

Arguably the proposed taxi rank and private hire pick up is less visible from the bus station however, when managing the flow of visitors to the 02 and on event nights it is easier to manage crowds when there is a degree of separation between the different modes which can reduce confusion and allow easier crowd control / movements. (See further comments below regarding the taxi rank / private hire design).

The phasing and delivery of the new interchange must be planned with TfL in order to ensure that customers can still access LU Jubilee Line Services, the bus station and taxi rank. At present there is an 02 Transport Forum which is managed by the 02 which allows stakeholders to share information. Where there are major changes to the transport infrastructure, as proposed in this application, a similar forum may be a way in which stakeholders can work to ensure a successful delivery. Such an obligation on the developer may be secured through the s.106 drafting.

In the pre-application discussions that were held with TfL there are matters of detailed design that will need to be addressed, for example how the design of the new interchange hub and bus station, the building design fronting the new bus station and access through the new interchange hub must be agreed with TfL as part of the reserved matter approvals to ensure the operational requirements needed by TfL are not compromised.

The inclusion of the high level walkway over the bus station to access the proposed multi storey car park is supported and was a suggesting arising out the pre-application discussions.
The re-alignment of the busway will assist in improving the junction arrangements to access the new bus station. TfL is committed to retaining the busway as this provides a segregated bus corridor which assists in maintaining journey time reliability.

Silvertown Tunnel – The Silvertown Tunnel represents a major infrastructure proposal that TfL are in the process of taking forward. It is listed in Table 6.1 in the London Plan where policy 6.2 providing public transport capacity and safeguarding land for transport requires development proposals to provide adequate safeguarding for those schemes as listed.

The scheme layout plan shows significant areas of direct overlap between the proposed buildings and the Silvertown tunnel, as well as encroachment into Silvertown’s currently proposed land-take and safeguarding boundaries. These direct overlaps will need to be the subject of build-over agreements and restrictions on construction phasing. It is essential that where the development overlaps the tunnel protective measures are put in place along with build-over agreements. This tunnel overlap will have considerable impacts for construction of the buildings and TfL will need to consider the implications for tunnel maintenance and accommodating development constructed above the tunnel alignment.

It is essential that the two projects work together to ensure project timetables and methods of construction are properly coordinated and integrated. It is anticipated that this co-ordination must be secured through the s.106 drafting. TfL will also need to see further detail on the proposed construction and phasing timetables as well as below ground details of proposed buildings (e.g. basements and foundations).

TfL will need assurances that the proposed building foundations are designed in such a way that they do not impose loads on the proposed tunnel and that they are capable of resisting likely ground movement and settlement.

The multi-storey car park coming forward in the first phase of the development (i.e. before tunnel construction) would benefit both projects reducing the need for temporary replacement car parking for the O2 in the initial phase of construction and could reduce the land take needed for the Silvertown tunnel works. TfL would wish to agree with the applicant further information on the basement and foundation details of the car park and other structures in the tunnel vicinity to ensure there are no problems in relation to the tunnel’s construction. Whilst the eastern corner of the car park structure overlaps with the proposed land take area for construction there may be

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scope to amend this subject to a better understanding of construction phasing and basement/foundation details.

The proposed tunnel alignment runs directly underneath the north-western corner of the film studios. It is noted that this is in development Zone B. The proposed construction method for the tunnel at this point is cut and cover (due to the proximity to the tunnel entrance). It is therefore essential that construction timetables are aligned and agreements are in place so as to allow the tunnel to be built in advance of the studios, and the foundation designs are appropriate as set out above.

The bored tunnel alignment travels underneath a number of Zone D buildings including 11, 12, 13, 14 and 19.01. It is assumed that as these are within Zone D the Silvertown tunnel will be constructed first (this is subject to confirmation). This again has implications for construction of the buildings as stated above.

The business units in Zone A labelled as 4 and 5 on the Development Zones plan will be just outside of the construction area but within the safeguarded area therefore having construction implications.

In terms of the air quality assessment, whilst TfL does not have any comments on the Environmental Assessment at this stage, it will be necessary to liaise with the applicant in order to share the outcomes results of TfL’s air quality modelling for the tunnel.

The Masterplan generally responds well to the tunnel by:

- Keeping sensitive uses and primary frontages away from the tunnel portal
- Locating non sensitive uses such as coach parking by the tunnel portal
- Keeping the land currently identified for tunnel operations building free from proposals

Recognising the existing primary pedestrian network and therefore connecting in with the Boord Street footbridge which TfL will be re-providing in its existing location as part of the Silvertown Tunnel project. (The current bridge needs to be removed due to realignment of the Blackwall Tunnel Approach)

Through the Silvertown project TfL will seek to continue to meet the aspirations for the pedestrian network to the west of the Masterplan area and
in order to ensure that the location of the Boord Street foot bridge remains optimal.

**Blackwall Tunnel** – As expressed at the pre-application stage there will still be a need to be agreement with TfL about the proximity of any building(s) in relation to Vent Shaft 4.

As part of any future detailed approval the access routes and working areas around Vent Shaft 4 and the Southern Floodgates need to be agreed. It is strongly recommended that there will need to be aim to develop the conversation with TfL on these aspects of the development in order to inform the ultimate decision by TfL on the acceptability of the phases of the development adjoining vent shaft 4.

The construction of the bridge over the southern approach of the Southbound Blackwall Tunnel will be significantly challenging and greater detail will be required from the applicant’s as to how this will be achieved without disruption to the safe and free flow of traffic on the Transport for London Road Network (TLRN). Similarly, Tunnel Avenue is and will remain the diversion route for vehicles prohibited from travelling through the Northbound Blackwall Tunnel and this function must not be compromised by the development.

There will need to be the necessary “build over” agreements with TfL to allow the developer’s proposals to be brought forward which will need to be secured through a s.106 agreement.

**Bus Services** - Bus services will provide access both to and across the Peninsula and are used as important link to LU services at North Greenwich. It is however, clear from the TA that further work on and analysis of the Railplan model outputs and the Bus Origin and Destination Survey (BODS) data is still to be carried out. When this is completed TfL will wish to comment further on the outputs and the impact assessment to be carried out by the applicant. This will inform any necessary site specific mitigation for bus services and bus service improvements secured through a s.106 agreement.

**London Underground** – The applicant has concluded that at full occupation has largely negligible impacts on London Underground (LU) network, but there are some increases Canary Wharf > North Greenwich in the am peak, although generally lower impact than the 2004 Masterplan. TfL has requested further modelling to ensure these conclusions are validated and the outcomes of the modelling are suitably robust as there are a number of reservations about the applicant’s conclusions drawn from the work carried out to date.
Similarly, whilst the new transport hub is proposed, the TA indicates that further work is required to assess the station capacity, alighting and boarding figures from the Railplan model. TfL will wish to review and comment on the outcomes of this work to assess any impacts that may need to be considered as part of the new Transport hub design. The designs include an additional set of escalators to the upper level which would provide pedestrian access to the west of the Peninsula. Greater clarity is required on where the escalators will land to determine whether or not they will have an impact on station operations, as well as who will procure and install them, and who will be responsible for on-going maintenance.

The applicant is in communication with London Underground engineers, and if the transport hub design is to be agreed, this conversation must continue to be as plans progress.

**River Services** - The proposals illustrate a new pier on the Western side of the Peninsula. This is supported as it is consistent with the Mayor’s River Action Plan. It will be helpful if the applicant is able to clarify when the pier will be brought forward as clearly TfL will have an interest in agreeing services and the operational requirements of any new pier if it is to be integrated as part of the current river services.

**Taxi and Private Hire** – There is reference in the TA to a taxi rank and a private hire drop off and pick up arrangements being provided. The accompany drawings suggest a taxi rank but it is unclear where the private hire pick up and drop of will be accommodated. This is important particularly for 02 events, but also for the management of private hire vehicles for the 02 and 02 Waterfront leisure uses when a pickup and drop off private hire area will be required. There also needs to be a consideration of kiss and ride and how this will be managed.

**Emirates Airline** – Good way finding to the Emirates Airline will need to be part of the way finding strategy for the peninsula. The Airline offers the opportunity for journeys to and from the peninsula as an alternative to LU, bus, river services, walking or cycling.

**Highway and Bus Priority measures** – The Highway Assessment – Technical Note shows that the development traffic impact is acceptable within the area of influence. The modelling approach is in line with TfL requirements however, TfL would encourage a more holistic approach to future highway measures and bus services. Further detail on bus journey time data and bus passenger demand would be helpful to inform this view.
There is a package of highway measures (as well as the proposal to facilitate the former Greenwich Waterfront Transit (GWT)) within the current s106 agreement, which will need to be revisited and translated into a new s.106 agreement which is reflected in the applicant’s TA.

Whilst the bus network on the Peninsula itself has the benefit of the busway and proposed improved highway junction / link to the new bus station there are a number of the links and junctions where it appears there are constraints on the bus network that serves North Greenwich. The concern is that in order to deliver a robust and reliable bus network to serve the peninsula. The TA suggests future works to the committed junctions in the s.106 should be reviewed on a junction per junction basis to determine whether they are needed or not. TfL recommends a more holistic approach that looks at the bus corridors and links to North Greenwich (within the area of influence) and review the use of the junction funding to support on highway measures to improve reliability of local bus services (e.g. against observed iBus data and forecast models) that serve the site.

This idea of a wider “Bus Service Improvements Strategy” was in the original s.106 agreement however, this was a developer led document that needed approval from the Council and TfL. It is suggested that a more collaborative approach is taken which requires a developer to consider changes to services (frequency, routing) to serve the Peninsula projects that to aid bus reliability / accessibility and with the Bus Service improvements strategy being a programme of implementation agreed as the outcome of the monitoring data, Travel Plan/ targets and surveys.

The developer should seek to facilitate bus access to the west of Greenwich Peninsula. This is suggested in the TA which looks at the retention of a GWT alignment to the west of the Peninsula. TfL considers this is important for the future of the land south west of the Greenwich Peninsula application site. Any planning permission, either through condition or s.106 agreement will need to ensure that the highway design, if necessary, can accommodate a bus link to the West of Millennium Way. It is suggested that a trigger or mechanism which allows an option review is carried out and agreed with TfL which can then inform the future design, prior to any approval, of this area of land to the west of the peninsula.

Walking and Cycling and Cycle Parking – As the phases of the development are brought forward the walking and cycling environment will need to be revisited. The general approach for a passive cycling and walking environment across the peninsula is generally supported. This challenge will be to ensure
an integrated and coherent network with the appropriate way finding as set out in the Policy 6.9 Cycling and 6.10 Walking of the London Plan. This will include the necessary on site changing facilities for cyclists as appropriate which is referred to in the applicant’s submission.

In terms of the cycle parking provision this must comply with the cycle parking minimum standards as set out in Table 6.3 of the London Plan and the idea of a cycle super-hub at North Greenwich is supported.

**Car Parking** - It is recognised that a parking for the 02 is required and the introduction of the high level walkway over the proposed bus station to the multi-story parking area is supported. There will need to be a management regime of the parking areas particularly for short stay pick up and drop off often by parents for certain 02 events where the audience profile is younger.

The lower car parking ratios being promoted for the peninsula are supported and the necessary provision for disabled car parking will also be required in line with Table 6.2 Car Parking Standards in the London Plan. The provision of electric vehicle charging points, to comply with the London Plan will however, need to be 20% of all spaces with an additional 20% passive provision for electric vehicles in the future.

**Freight** – London Plan 6.14 Freight, whilst promoting the update of the Fleet Operators Recognition Scheme (FORS) for construction logistics plans and deliver and servicing plans look to more innovative freight solutions in line with the London Freight Plan. These should be co-ordinated with Travel Plans. TfL would wish to see opportunities to the use the Thames particularly for any construction logistics, a consolidation centre and “break bulk” facility for the Peninsula. There is reference to site waste management plans, improved procurement and consultation with selected suppliers regarding commitments to waste minimisation, recycling and the emphasis on continual improvement in environmental performance, which is supported which needs to be translated to specific plans with targets that can be monitored and a review process.

**Coaches** - The proposed coach parking is required particularly for 02 events. It is essential to ensure that the coach parking requirements are addressed either through the coach parking numbers or managing coach numbers in order to ensure that the operation of the highway is not compromised by managing the coach numbers. This is a particular concern if these affect buses or taxis accessing the interchange.
Travel Plan – The Framework Travel Plan submitted with the application includes a number of SMART targets and a monitoring and review regime. It is however, questioned whether the review mechanism which is triggered at 75% occupancy is right for a development that will be phased over several years particularly if travel behaviour is to be influenced on occupation, which is referred to in the document.

Phasing - TfL is mindful of the need to accommodate 02 event and how the build out of the Masterplan, the new transport hub, build over agreements and phasing in respect of the Blackwall Tunnel, the construction of the Silvertown Tunnel and proposals will be phased and managed. Agreement will therefore be needed with TfL on a number of these issues.

s.106 Mitigation Measures - The 2004 s.106 agreement that accompanied the grant of planning permission included a series of obligations to support the transport network. It is still envisaged that site specific infrastructure necessary to support the development will still be required in order to ensure the development is acceptable. Some of the 2004 obligations, for example a new pier are part of the new Masterplan proposals. Other financial and infrastructure measures, e.g. junction proposals, bus services, bus stop infrastructure etc. will need to be revisited and informed on completion of the strategic modelling work. TfL will look to agree the package of mitigation with the applicant and Royal Borough of Greenwich through further discussion of the proposals and the conclusion of the strategic modelling.

Summary – A key to assessing the impact of the development on the transport network will be the completion of the strategic modelling. This will then inform the site specific mitigation that will be needed to be delivered through an s.106 agreement.

TfL has indicated above where it is supportive of the proposals and where further agreement will be required. TfL will therefore be looking to work in conjunction with the applicants and the Royal Borough of Greenwich to achieve these outcomes and the delivery of the Masterplan proposals.

TfL has a property interest in the land and the Masterplan development. TfL will therefore be in responding to the applicant outside the planning application process in order to ensure its property interests are not prejudiced by the development but also, where it is able, to facilitate the development process and to secure the transport benefits that are being proposed. The above response is solely in respect of TfL’s operational interests as a Transport Authority.
Comments dated 17 August 2015:

**Overall approach and Strategic Modelling Outputs**

As the application is in outline, the comments raised at Stage 1 are still relevant as they relate to the future detailed approval and design of interchange and Peninsula generally. For ease of reference I have appended the TfL Stage 1 comments to this email. The following therefore looks to summarise TfL’s more focussed discussions with Knight Dragon and position to date.

The applicant undertook a Strategic Transport Modelling exercise using Railplan which looked at the impact of the development on the public transport network and the Highway Assessment Model (HAM) which looks at the impact the development would have on the highway network. Public transport modelling considered all Public Transport modes with a particular focus on the Jubilee Line and Bus Services operating to and from North Greenwich. The HAM modelling allowed for an assessment of the impact of development on the key gateway junctions that were part of the agreed 2004 Masterplan.

The strategic outputs from the modelling indicate that the development can be accommodated on the public transport network, however, the Jubilee Line is under increasing pressure from this and other development which is being brought forward particularly in East London, demonstrated through the wider opportunity and growth area work carried out by TfL. Whilst a programme of improvements on the Jubilee Line will see an increase in the number of trains per hour (tph) from 30tph (current peak service) to 36tph peak service by 2019 the capacity of the Jubilee Line is however, largely fixed. The increased number of residential units with a decrease in the car parking ratio from 0.7 to 0.25 is supported and is consistent with policy however it will mean a higher dependence on the public transport network by a greater number of residents than was anticipated in the 2004 Masterplan.

It has therefore been necessary to consider a range of other opportunities, other than the Jubilee Line to ensure that future public transport provision will provide greater resilience and that the proposals are acceptable in planning terms - which are outlined as follows:

**London Underground (LU)**

The delivery of the interchange and works over the LU station box will require the applicant to enter into a separate development agreement with
TfL / LU. The works to the interchange will need to comply with London Underground Station Planning Design Standards and Guidelines. It is essential that these requirements are satisfied to ensure safety. This document applies to the spatial aspects of station planning in the following areas: Public areas within stations; Operational staff accommodation; Evacuation; and are therefore essential for the delivery of the interchange. There is also a requirement for TfL / LU operational car parking (70 spaces) which is required for the operation of Jubilee Line trains on the network.

As the detail of the transport hub design is subject to future approval, which is assumed to be a reserved matter submission following a grant of planning permission. It is essential that TfL is party to the approval process not just for the above station works but the wider interchange zone e.g. buildings beyond the interchange but adjacent to it, in order to ensure that decisions are not inadvertently made that compromise the delivery of the interchange or operational requirement needed by London Underground.

**Bus Station**

As previously indicated the bus station design is acceptable “in principal” however, there are concerns about the bus station edges and the land uses that will abut the bus station and the potential for compromising the operational requirements of the bus station. There are still concerns about the creation of a “wind tunnel” effect through the bus station.

As with the comments in respect of London Underground, the detail of the transport hub design is subject to future approval, which is assumed to be a reserved matter submission following a grant of planning permission. It is essential that TfL is party to the approval process not just for the bus station works but the wider interchange zone (e.g. the high level walkway over the bus station is an example of where this is a key part of the interchange design an how the interchange may operate) in order to ensure that decisions are not inadvertently made that compromise the delivery of the interchange or operational requirement needed by TfL Buses.

**Interchange**

In addition to the London Underground and TfL Buses there is the question of the wider interchange requirements including the design and delivery of the taxi rank, private hire pick up and drop off, kiss and drop, disabled parking, servicing and deliveries and cycle parking sight lines and the public realm / design of the approaches to Riverbus services and the Emirates Airline. Similar to that as expressed above, the detail of the wider transport
hub these elements of the interchange will be subject to future approval, which is assumed to be a reserved matter submission following a grant of planning permission. It is essential that TfL is party to the approval process for the wider interchange zone in order to ensure that decisions are not inadvertently made that compromise the delivery of the interchange or operational requirement needed by TfL. Similarly, for taxi and private hire there will be design considerations for the proposed hotels. There is also a need to ensure that the Interchange operates successfully for 02 events.

As noted below, the cost of the interchange / bus station delivery should be at nil cost to TfL. In other agreements the developer has been required to pay for staff time and / or an internal staff appointment to sit within TfL for managing the project(s) delivery. TfL has recommended such an approach to Knight Dragon and they have indicated they would accept this approach given the degree of internal approval / sign off that will be required.

**Bus Network**

TfL has been in discussion with Knight Dragon to agree a s.106 funding package for supporting the bus network. We are looking to agree the terms of the funding package but this would include monies currently held by RB Greenwich (circa £1.6 million) which have been already been paid by Quintain to RBG and are still held by the borough. In discussion with Knight Dragon it was noted that the developer led Bus Service Improvements Strategy had not delivered the outcomes for service improvements that we anticipated. What TfL is looking to move towards is pump priming of services so that the bus network is there ready to accommodate the developments as they come forward and the money is there to support the early delivery of additional bus services. The pump priming of bus service can be achieved through agreeing trigger dates for the release of s.106 monies all of which will need to be agreed through the drafting process. Bus route changes and route extensions are subject to stakeholder engagement and Knight Dragon have indicated they are content that if included in this stakeholder engagement process this should allow them a reasonable oversight of any proposed bus service changes. This approach was adopted in the Stratford City s.106 agreement and worked successfully there. There does however, need to be a mechanism in the s.106 agreement to allow the draw-down and transfer of monies to TfL to allow the service improvements to be delivered. This needs to be agreed with RB Greenwich and KD through the s.106 drafting.

The discussion of a bus network worked on the basis of a theoretical future service plan which included a range of bus service enhancements that would
serve the Peninsula and beyond. These included a new Kidbrooke Village – North Greenwich route together with frequency and or route extensions which would also serve the Peninsula. The cost of delivering a range of service changes over a five year period was estimated to be in the order of £30 million. This figure is indicative but based on current costs for bus services and therefore a reasonable approximation of the costs involved. The expectation was that Knight Dragon would make a contribution towards the delivery of these potential future route changes and on this basis they have offered a £12 million package of bus funding as detailed below which includes monies currently held by RBG. The release of the monies are proposed to be triggered by the build out of the current application housing numbers which is a reasonable approach. I would expect these figures to be indexed to take account of inflation. This approach is considered acceptable to TfL.

This approach is considered acceptable to TfL.

**Gateway Junctions**

The Strategic Highway Modelling assessed the impact of the development on the gateway junctions and of the proposed junction works as set out in the original s.106 agreement to see whether they are still fit for purpose. In addition KD / WSP have been asked to look at the John Harrison Way / Bugsby’s Way round about to have a look at the performance of the roundabout particularly for 02 event departures.

The Gateway Junctions in the original s.106 were labelled A to J, ten in total. I believe that works have been delivered in terms of A to D which have included:

A – Improvements to A 102 / East India Dock Road and VMS signs.
B- Improvement to prevent rat running between the toff slip / on slip A 102 Blackwall Lane
C- Bus priority from Westcombe Hill on to A102 slip
D- Pedestrian crossing on A102 Woowich Road

WSP has reviewed Junctions E – J as follows and TfL has commented on the proposals. I note however, that a number of these junctions are on the Borough road network and therefore it is not TfL has the highway authority who are responsible for their delivery, this is very much down to the borough.

**Works E: Gateway Junction 1 – improve northbound merge facility onto A102 as Drawing 29.** Improvement would not have significant benefit
during peak times, when traffic queues block back from the downstream lane-drop on approach to the tunnel, but may provide some benefit in the shoulders of the peaks. Northbound merging flow from Tunnel Avenue, and A102 northbound mainline flow, not significantly different with proposed development.

This scheme still has merit and should be included in a mitigation package.

TfL agree with this approach.

**Works F: Gateway Junction 6 – link onto A102 from Millennium Way as Drawing 30.** This junction was originally proposed as part of the 2004 Masterplan, but does not form part of the Proposed Masterplan for Greenwich Peninsula.

This junction improvement is therefore not required

TfL accept this approach.

**Works G: Gateway Junction 3 – improvements to junction of Trafalgar Road and Blackwall Lane Junction as Drawing 31.** The 2004 Masterplan proposals show the creation of a short two-lane section on the eastbound exit arm of this junction to improve eastbound capacity. Since 2004 a cycle lane has been implemented on this arm reallocating this road space away from motorised traffic.

This scheme is considered no longer appropriate given its conflict with the cycle improvements.

TfL agree with this approach and the retention of the cycle lane.

**Works H: Gateway Junction 5 - improvements to off slip from A102 to west side of Greenwich Peninsula Ward as Drawing 32.** The proposed junction enables HGVs to exit Tunnel Avenue at this location (currently prohibited) to travel north through the Blackwall Tunnel; avoiding the need for HGVs to travel through the Proposed Masterplan. Should the Silvertown Tunnel be constructed the need for this junction would diminish because as part of those proposals Tunnel Avenue would provide a full connection between Blackwall Lane and the north-western side of the peninsula. It is therefore considered that these improvements be included within the S106, but subject to the Silvertown Tunnel not coming forward by 2023, or alternate date to be agreed.
This approach is agreed. The current junction arrangement which prohibits vehicle movement at this slip are likely to remain as they were a safety intervention.

**Works I: Gateway Junction 2 – junction improvements Woolwich Road under A102 overbridge as Drawing 28.** 2004 Masterplan proposals included the creation of a two lane left turn facility from the A206 to Peartree Way (through an existing green open space / park) and improvements to geometry for eastbound A206 movements crossing the A102. Modelling does not indicate that this improvement is required to accommodate development traffic, or to mitigate an identified impact.

This scheme is no longer considered required or appropriate, given the impact on the open space and minimal effect of the development in this location.

This approach is accepted.

**Works J: Gateway Junction 4 – improvements to bus priority at junction of Anchor & Hope Lane and Woolwich Road junction as Drawing 33.** Improvements proposed as part of the 2004 Masterplan are associated with the Greenwich Waterfront Transit (GWT) project which is no longer a live scheme. Modelling does not identify any capacity issues at this location. The junction is already well configured for bus priority with bus lanes provided on Anchor & Hope Lane, Woolwich Road (westbound) and Charlton Church Lane. TfL requested further investigation of improvement options at this junction, focussing on bus priority.

WSP identified various works that have been carried out by RBG and an on-site assessment of the junction’s performance which suggested that it was working efficiently and therefore no alterations to the junction are proposed. As the junction work in the original s.106 focussed on delivering improvements to support GWT TfL accepts the applicant’s conclusions.

**Millennium Way / Bugsby’s Way / Blackwall Lane / John Harrison Way (Further Works K)**

It was requested by TfL that the roundabout be examined given the likely traffic flows from future 02 event traffic on the Peninsula.

The junction is a 4 arm priority controlled roundabout. WSP’s from the Highway Modelling work suggests that the current roundabout layout will be
within capacity under 2031 peak hour. However, it is recognised, and as reported by local residents that under 02 event conditions the roundabout is difficult to negotiate due to the high levels of flow and poor “lane discipline”.

Whilst signalisation of the junction would is not ideal in order to improve efficiency and safety WSP have proposed that lane markings be installed around the gyratory. It may also be appropriate to consider yellow box markings if traffic continues to block local routes under event discharge conditions.

This approach seems reasonable and is supported by TfL.

WSP have also provided a new table summarising the junction interventions.

On the basis that the above Gateway Junctions are still considered appropriate and will be included within a revised s.106 agreement it is suggested that the drafting of the agreement allows the review of the works and their design at the time of implementation with any drawings that accompany the s106 agreement as being “indicative” proposals. This is to reflect changes, whether on the highway, best practice or other sound highway design reasons at the time of implementation which may be several years form the date of any planning permission or agreement.

As set out in the Stage 1 report there are the detailed comments for the wider development and delivery which remain relevant and should therefore be read in conjunction with this summary.

There are the property and operational requirements around the interchange delivery which need to be captured through the planning application / s.106 delivery process. These may be separate agreement between TfL and the developer but the following summary highlight issues that will need to be addressed if the planning permission is to be successfully implemented. I have provided this summary for your information as I believe it does help in explaining the extent of TfL’s interest in the site which are: Passengers access rights; Costs of new transport infrastructure; TfL internal costs; State Aid; Procurement; Future ownership and management structure; Protection against financial collapse or delays; Staff parking in LUL car park; Transport Hub Building; Piazza surrounding Transport Hub Building; Service and emergency vehicle access and parking rights; Emergency exit rights; Blue Badge car park; Electric vehicle charging points; Kiss and Ride / Drop; Bus station – red line boundary; Bus station – ownership; Bus station – noise and other disturbance ; Bus station – drivers’ toilets and mess room; Bus station – footbridge; Bus way – new alignment ;Taxi rank; Private Hire Cycle stands
Construction management planning and implementation; Security infrastructure Hub/ Hut / Stands.

The following thoughts are TfL’s initial suggestions for a S.106 agreement heads of terms where TfL has an interest or where there must be TfL approval for the scheme.

**DRAFT possible s.106 Heads of Terms TfL approval / transport interest.**

**Transport Interchange:**

Transport Hub concourse area over the LU escalators
Taxi Rank (including capacity for 02 events – marshalling and management)
Private Hire drop off / pick up (including capacity for 02 events marshalling and management)
Kiss and Drop – including capacity needs for 02 event management.
Disabled Parking at the Interchange
London Underground operational parking (70 spaces – essential for Jubilee Line train operation)
Interchange delivery / servicing arrangements for the station / retail etc.
Cycle parking

Development Agreement(s) (or Works Agreement) required between TfL and Knight Dragon to deliver the new Transport Hub / Interchange requires TfL / LU – approval. The Development Agreement must contain the works / construction / delivery programme to ensure that continued operational requirements for London Underground are still met.

There will also be the property and land interests that are outlined above that will need to be addressed.

**New Bus Station**

Development Agreement between Knight Dragon and TfL for the Bus Station / Delivery TfL / TfL buses – approval. The Development Agreement must contain the works / construction / delivery programme to ensure that continued operational requirements for TfL Buses are still met.

In both of the above the agreements (Interchange and bus station) TfL need to:
• ensure the continued operational requirements of delivering a new bus station and interchange can be achieved minimising the disruption to TfL services.

• Look to the developer to funded post(s) as appropriate to sit within TfL particularly to steer the delivery of the Interchange and bus station design – could be part of a development agreement(s)

**Bus Network**

Bus Services / future network – TfL approval (Current discussions with Knight Dragon on monies to “pump prime” future bus operations and the best way to ensure appropriate draw down of monies to TfL – Greenwich currently hold some £1.7 million.

Bus Infrastructure (bus stops locations) – TfL approval

**Emirates Airline**

Public realm around the terminal and approaches to the Airline – TfL interest in maintaining sight lines etc. to the Interchange and wayfinding.

**Thames Clipper Services**

New Pier – TfL interest to ensure design fit for purpose and provides necessary ticketing and other facilities as part of the Mayor’s River Strategy – potentially a new shuttle service from the new pier to Canary Wharf – seeking advice from Thames Clippers on the question of such as service. It is understood that the developers will provide a commitment to the pier delivery through a s.106 obligation.

**Build Over Agreement(s) for:**

Blackwall Tunnel Approach Roads – TfL approval required.

Blackwall Tunnel operational requirements – vent shaft 4 and floodgate – uninterrupted 24/7 access and – essential that TfL agree proximity of any new development and how the design of any new development may impact on the Blackwall Tunnel operations – TfL approval required.
Other build over agreements as and when required for any works that oversail TfL infrastructure (e.g. cranes that may oversail the station box / new bus station etc.) TfL approval required.

**Land and Works Agreement(s)**

Silvertown Tunnel – a land and works agreement – TfL approval required.

**Revised Gateway Junctions** – (highway alterations) approvals – where it may impact on the Transport for London Road Network – TfL approval required.
Currently Knight Dragon is re-visiting the gateway junctions that were in the original s.106 agreement to confirm they are still required and if so fit for purpose and provided for bus priority where appropriate.

**Managing the Delivery of the above** - nil cost to TfL / TfL resourcing

**Signage** / Legible London – TfL interest particularly signage to and from the new Interchange and bus station, Airline and piers.

**Lesser but still important considerations which may potentially be covered by conditions and or s.106 agreement.**

**Construction Management Plan** (in addition to the Bus Station / Interchange) – TfL interest – Freight / use of the river FORS etc.

**Servicing** and Delivery Strategy - (in addition to the Bus Station / Interchange) TfL interest – bus how it may affect or benefit the interchange.

**Travel Planning** – TfL interest given the concern regarding the Jubilee Line and the need to promote bus (and other – River Services, Airline, walking and cycling) transport alternatives).

*The modelling has now been agreed between TfL and the applicant. TfL have confirmed that the scheme is acceptable subject to S106 Contributions and appropriate conditions.*

*The Council does not agree with the removal of gateway junctions G, I and J from the S106 obligations as certain works at those junctions are still required. The Council agrees with the removal of junction H.*

*Suitable conditions and S106 obligations are proposed to address TfL’s comments.*
7.7 **London Underground (LU)**

*Comments dated 23 July 2015:*

It is confirmed that the planning applicant is in consultation with London Underground on this project. As such LU have no objection to the planning application for the property above. However they do ask that a condition is included on any planning permission granted stipulating that:

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- accommodate the location of the existing London Underground structures and tunnels
- accommodate ground movement arising from the construction thereof
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and ‘Land for Industry and Transport’ Supplementary Planning Guidance 2012

*Comments dated 19 August 2015:*

London Underground Infrastructure Protection will accept the changes proposed to the above condition by the applicant provided the following can be incorporated within the amended condition:

- The influence zone must be agreed in advance with LU
The condition has been included in the recommendation.

7.8 Thames Water

Comments dated 21 July 2015:

Waste Comments - Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. “Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed”. Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

Water Comments – The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to...
underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Thames Water recommends the following informative be attached to any planning permission: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

Suitable conditions and informatives have been included to address these comments.

7.9 Environment Agency (EA)

Comments dated 28 April 2015:

The EA has no objection to the principles set out in the Outline Masterplan for Greenwich Peninsula.

The next phase in the continued redevelopment of Greenwich Peninsula offers an excellent opportunity to build on previous good practice such as the tidal terracing and renewed flood defences and green roof master plan across the peninsula. The EA welcomes the commitment to ensure that ecology (including provision for green roofs), river wall raisings and flood risk management have been incorporated into the master plan.

New development should be informed by the latest planning policies, environmental evidence and data to deliver good practice flood risk management, sustainable design and construction and environmental improvements across the Peninsula. The EA encourages ongoing discussions and early pre application discussions as the development progresses.

The EA has produced advice with Natural England and the Forestry Commission on how new development can help improve the environment. This is in line with the national planning policy framework (NPPF).

“the planning system should contribute to and enhance the natural and local environment” (Para 109).
The submitted outline application seeks to approve parameter plans, design guidelines development specification only. The EA also understands that a three tiered approach to planning permissions at Greenwich Peninsula is proposed including approval for the Masterplan, zonal masterplans followed by reserved matters.

The EA are keen to continue partnership working with the Royal Borough of Greenwich and the applicant to ensure that planning conditions are incorporated at the most appropriate and relevant stage in the proposed planning process. They have provided further comments on their key issues and opportunities in the following sections attached to this response:
Section 1 - Flood risk management and climate change
Section 2 – Fisheries and biodiversity
Section 3 - Groundwater protection and contaminated land

These sections detail the key topics the EA would like planning conditions to cover. It is important that the wording of conditions is flexible to changing environmental evidence / data especially for flood risk management where levels and thresholds change over time.

The EA would like to have further discussions about how planning conditions could be included to ensure these issues are addressed at the appropriate stage in this planning process. They are happy to provide further wording on these conditions once an approach is agreed.

Section 1 – Flood Risk Management and Climate Change

The EA supports the visions for the neighbourhoods proposed that seeks to optimises the river Thames waterfront and a commitment to raising the flood defences along Greenwich Peninsula.

It is important the following key areas are addressed as the detailed design progresses, which should be secured by planning conditions at a relevant stage in the design process:

- The built development provides adequate set back from the flood defences. The EA request a 16 metres buffer zone and suggest this could form a condition on the proposed outline permission.
- How the river walls will be raised to an appropriate level for 2100 (note currently this 6.2m AOD, but will be subject to change over the life time of this development). The EA suggest this could form a condition on the
proposed outline permission, with consideration given to long term parameters.

- Investigations into the condition of the river wall and exploring if the flood defences can be set back to make more space for water.
- How the proposed public realm and running track proposed will interact with the flood defences and landscaping.
- How finished floor levels will be set and how safe access and refuge can be provided within the buildings and ensuring appropriate uses and sleeping accommodation is provided.
- Resisting non-river related uses at the detailed design stage.
- How the jetty proposed at Meridian Quays will be designed to minimise the footprint in the River Thames and be designed to prevent scour of the foreshore.
- How surface water will be managed. Please note that the EA is no longer a statutory consultee for surface water drainage. They will be putting together a historic briefing on their involvement in surface water at Greenwich Peninsula for the Council’s drainage engineer to take forward.

Section 2 – Fisheries and Biodiversity

The EA strongly support the intention to create a waterfront park which will optimise the ecological potential of the river foreshore within the design specification. They also welcome illustrative plans that indicate green corridors linked to green open space across Greenwich Peninsula.

The EA are keen to provide advice in the early stages of the design process to ensure ecological enhancements can be achieved. They would particularly like to discuss the possibility of further set back of the river wall and the creation of reed beds as part of this intention. The design and access statement provides a comprehensive list of ecological improvements that could be undertaken and we expect these to be fully explored.

It is important the following key areas are addressed as the detailed design progresses which they would be likely to secure by planning conditions at a relevant stage in the design process:

- Demonstrating that the overall scheme will provide net gains for biodiversity- the EA suggest this could form a condition on the proposed outline permission.
- Consideration of the ecological impacts of the proposed jetty at Meridian Quays, (including construction and operation) and how mitigation will be considered.
• How the proposed works to the river wall will contribute to biodiversity, including how reedbeds/vertical beaches and other ecological enhancements will be considered.
• How the management of ecological features (including new and existing reed beds) undertaken to ensure plantings will establish and fulfill their ecological function.
• Ensuring a minimum 16 metre buffer zones are established between the river wall and built development.
• The composition and extent of native planting proposed.
• Resisting non-river related proposals at the detailed design stage.

Section 3 – Groundwater Protection and Contaminated Land

The EA are pleased that the use of an Environmental Method Statement (EMS) is proposed to continue in line with the previous master plan.

It is important the following key areas are addressed as the detailed design progresses which they would be likely to secure by planning conditions at a relevant stage in the design process:

• How an overall remediation strategy which meets the EMS can be provided for to maintain the integrity of remediation works previously carried out- they suggest this could form a condition on the proposed outline permission.
• The standard piling, infiltration and unsuspected contamination conditions the EA normally request
• How to streamline the reports required by the EMS with requirements normally set out by standard land contamination conditions. Under the proposed EMS the following reports must be submitted to demonstrate that ground conditions, contamination assessments and appropriate construction methods are understood at a site. The EA could consider if the standard contamination conditions could be improved by acknowledging the above documents are what they will most likely receive. These are:
  - Works Method Statement (Planning)
  - Works Method Statement (Design)
  - Works Method Statement (Construction)
  - Validation Report
• How the impacts of the proposed Silvertown Tunnel scheme will be considered on the Masterplan design. This may impact locally on water management, groundwater flow and building designs (particularly foundations) which could affect the detailed design.
• How controls for surface water management are required to meet the needs of the EMS.

Comments dated 6th August 2015

The EA has no objections to the revisions proposed.

The comments in section 5 of the ‘Greenwich Peninsula 2015 Masterplan Planning Addendum: Consultation Response’ are noted regarding the scope of planning conditions the EA would like to include for the master plan and subsequent permissions. The key topic areas are highlighted in the previous response dated 28 April reference SL/2015/114194/01.

It is important that these conditions are secured at the right stage in the proposed planning process to continue previous good practices such as tidal terracing, set back of the flood defences, flood risk management and ecology are improved and enhanced.

Suitable conditions and informatives have been included to address these comments.

7.10 London City Airport

Comments dated 25 March 2015:

The proposed development has been examined from an aerodrome safeguarding aspect and from the information given LCY has no safeguarding objection. However please note the following conditions:

1. No building or structure forming part of the permanent development will exceed London City Airport’s Obstacle Limitation Surfaces (OLS).

2. No construction works such as cranes or scaffolding above the height of the planned development shall be erected on site unless a construction methodology statement and details of their use in relation to the location, maximum operating height and duration have been submitted and approved in writing by London City Airport.

3. All landscaping plans and all plating, including green and brown roofs, should be considered in view of making them unattractive to birds so as not to have an adverse effect on the safety of operations at London City Airport by encouraging bird roosting and thereby presenting a bird strike threat to aircraft operating at the Airport.
Comments dated 13 August 2015:

London City Airport would have no further comments on this amended application, as there are no changes to the proposed maximum heights of the buildings. The comments made, and conditions requested, previously would still be applicable.

Suitable conditions and informatives have been included in the recommendation to address these comments.

7.11 Historic England (HE)

Comments dated 1 April 2015:

HE specialist staff have considered the information received and they do not wish to offer any comments on this occasion.

It is recommended that this application should be determined in accordance with national and local policy guidance, and on the basis of the Royal Borough’s specialist conservation advice.

In returning the application without comment, HE stresses that it is not expressing any views on the merits of the proposals which are the subject of the application.

Comments dated 21 July 2015:

HE specialist staff have considered the information received and they do not wish to offer any comments on this occasion.

It is recommended that this application should be determined in accordance with national and local policy guidance, and on the basis of the Royal Borough’s specialist conservation advice.

In returning the application without comment, HE stresses that it is not expressing any views on the merits of the proposals which are the subject of the application.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that Royal Greenwich contact the Greater London Archaeological Advisory Service for further advice.
These comments are noted.

7.12 Historic England – Archaeology Advisor

Comments dated 24 April 2015:

Archaeological Baseline Report for ES chapter

It is noted that the application includes an archaeological baseline report prepared by RPS Group Ltd dated 24 February 2015, Appendix 12, volume 2, environmental statement.

Having considered the submitted document it should be noted that it reports upon the variation of level of the underlying gravel horizon across the Peninsula. It may be that some of the observed levels reflect localised truncation through earlier remediation activity. The report suggests that no archaeological evidence has been recorded from the immediate vicinity. However, for example, Iron Age pottery has been recorded from the eastern side of the site on the Greater London Historic Environment Record, MLO5363.

Recommend On-going Archaeological Interest

Chapter 12, volume 1, environmental statement, 27 February 2015 outlines the range of archaeological consideration with section 12.7 detailing the mitigation response proposed for each stage of consideration through the development planning process.

Having considered the content of chapter 12 the Archaeology Advisor is happy to recommend its approval.

In summary, archaeology will be considered at an early stage to enable identification of the potential need to undertake site evaluation work to thereby inform the design process and or mitigation response.

A standard condition wording is recommended for sites that have been assessed as having an archaeological interest that can be secured by condition:

Reason: Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF.
Conditions
A) No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological evaluation in accordance with a written scheme which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to the local planning authority.
B) If heritage assets of archaeological interest are identified by the evaluation under Part A, then before development, other than demolition to existing ground level, commences the applicant (or their heirs and successors in title) shall secure the implementation of a programme of archaeological investigation/mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.
C) No development other than demolition to existing ground level shall take place other that in accordance with the Written Scheme of Investigation approved under Part (B).
D) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (B), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.

*Suitable conditions and informatives have been included in the recommendation to address these comments.*

7.13 National Planning Casework Unit (NPCU)

Comments dated 9 April 2015:

NPCU acknowledge receipt of the consultation letter and discs regarding the Environmental Statement for the application.

NPCU have no further comments to make.

*These comments are noted.*
7.14 Sport England

Comments dated 8 May 2015:

Statutory consultation response

London Soccerdome

It is understood that the site forms part of, or constitutes a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No. 2184), in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that is allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.

Sport England has therefore considered the application in the light of its playing fields policy. The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. The policy states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies.”

Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country.

The proposed development would result in the loss of the London Soccerdome (including two floodlit 3G artificial grass pitches). Although the proposed development would not be consistent with any of the exceptions within Sport England’s Playing Fields Policy, in this instance Sport England is mindful that the London Soccerdome was only provided on a temporary basis. The Case Officer for this application confirmed the following:
“Thank you for your email. The London Soccerdome was intended to be a temporary facility – please refer to the attached decision notice. The Soccerdome has now been removed from the site.”

This being the case, Sport England does not wish to raise an objection to this aspect of the proposed development.

Non Statutory consultation response

Residential development

Although a central park and a school with playing field provision are proposed, no formal sports facilities with community use are currently being secured as part of the proposed development. Sport England would be keen to explore this further.

Sport England has assessed the application against its adopted planning policy objectives. The focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should be required to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.

This requirement is supported by the Governments National Planning Policy Framework, which states:

“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. (Principle 12 is) that planning should:

Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” [Paragraph 17]
“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments…

- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”

Paragraph 70

The population of the proposed development is 22,323. This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with Circular 05/05, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

You may be aware that Sport England’s Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 22,323 will generate a demand for 1.18 swimming pools (£4,231,775), 1.70 sports halls (£5,119,885), 0.17 indoor bowls centres (£336,927) and 0.80 artificial turf pitches (£818,912 3G or £721,753 Sand).

Furthermore, the requirement for natural turf playing pitch provision arising from the proposed population should be considered. The draft Greenwich Playing Pitch Strategy identifies the need for both natural turf and artificial grass pitch provision.

Securing planning obligations towards the provision of indoor and outdoor sports facilities would be supported by Greenwich’s Unitary Development Plan (2006) policies C3 (Major Residential Developments) and SC2 (Community Needs, Benefits and Services). Furthermore, the requirement of this provision is also supported by Draft Core Strategy with Development Management Policies (2011) document policies CH1 Cohesive Communities and C1 Infrastructure.

In light of the above, Sport England wishes to object to this application.

Comments dated 12 June 2015
Prior to providing a further/final consultation response, the applicant is requested to provide the following information:

- Confirmation of if all indoor and outdoor sports facility requirements will be delivered on site and/or through a financial contribution towards off-site provision, secured via a Section 106 Agreement, or if full CIL payments will be secured in relation to this development.

Once the above information has been provided Sport England will be happy to review its current position of objecting to this application.

Comments dated 13 July 2015

Sport England now understands that Greenwich has adopted CIL and the Infrastructure (regulation 123) list includes Local and social community facilities including libraries, sports and leisure facilities. It has also been confirmed that the current application will be subject to CIL in accordance with the Royal Greenwich CIL Charging Schedule. Sport England therefore recommends that consideration should be given to the sporting facility needs arising as a result of the proposed development (as outlined in Sport England’s consultation response dated 08th May 2015 and the now finalised Greenwich Playing Pitch Strategy) and therefore where CIL should be spent.

Sport England therefore now removes its non-statutory objection to this planning application.

The Council will consider appropriate requests for CIL funding from its CIL receipts.

7.15 Highways England

Comments dated 14 April 2015:

Highways England has reviewed the information provided within the Transport Assessment for the Land at Greenwich Peninsula. They have no comment on the development as it will not affect the Strategic Road Network.

The reasons why no comment is required are:

- The site is a significant distance away from the strategic road network (M25)
• Due to the central London location a large proportion of the trips generated by the site use public transport
• A large part of the development site already has outline planning permission, of which some has been built out. (Outline planning permission was approved for the Greenwich Peninsula Masterplan in 2004).

Therefore the conclusion that the transport assessment comes to is reasonable i.e. “Beyond the development boundary and immediate access / egress routes the changes in traffic flow, v/c (volume-to-capacity) ratio, travel time and queuing is very small.”

Comments dated 28 July 2015:

The consultation letter dated 14th July 2015 appears to relate to the same application as was responded to on 14th April 2015.

A copy of Highways England’s response to original application is attached.

Royal Greenwich is asked to confirm that this is indeed the same application or, if different, outline variations to enable Highways England to ensure that their original response remains appropriate.

These comments are noted. The nature of the changes to the application was explained to Highways England. No further comments were received.

7.16 Natural England (NE)

Comments dated 22 April 2015:

Natural England is a non-departmental public body. NE’s statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.
NE has considered the contents of the documents submitted to them and have the following comments to make:

Provision of high quality publicly accessible green and open spaces
NE are pleased to see that it is proposed that there will be a system of interconnected green spaces in the development (page 86, Design and Access Statement) and that Central Park will be the “green lung” of the Peninsula (page 88, Design and Access Statement).
The NPPF states at paragraph 117 that local authorities should plan for green infrastructure and:
“... promote mixed use developments and encourage multiple benefits from the use of land in urban ... areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)”.

Green infrastructure potential
The development area is within an area that Natural England considers would benefit from enhanced green infrastructure (GI) provision. As such, Natural England encourages the incorporation of GI into the development.

GI can be designed to maximise the benefits needed for this area, for example it can be used to promote opportunities for recreation, improve links between communities and enhance flood-water management to protect surrounding homes and businesses. It can also be used to improve connectivity to other green spaces and to improve conservation and biodiversity. NE strongly encourage Royal Greenwich to maximise opportunities to incorporate green infrastructure during the development of the area.

Natural England provides guidance for local planning authorities on Green Infrastructure on their website.

Green roofs
One way of providing enhanced green infrastructure and biodiversity in such an environment can be through the provision of green roofs.

Natural England is supportive of the inclusion of green roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding, reducing the requirement for heating and air-conditioning and providing habitat for wildlife.

NE would advise the council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage consideration of the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. Refer to http://livingroofs.org/ for a range of innovative solutions and http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf (London GLA 2008) regarding the fit with the London Plan policy.
Accessible Natural Greenspace Standard (ANGSt)
Natural green spaces are important to our quality of life, providing a wide range of benefits for people and the environment. Evidence shows that access to natural green spaces for fresh air, exercise and quiet contemplation has benefits for both physical and mental health. Research provides good evidence of reductions in levels of heart disease, obesity and depression where people live close to green spaces.

In addition to their potential ecological value, green spaces also help us adapt to changes in climate through their role in reducing the risk of flooding and by cooling the local environment. Where trees are present they also act as filters for air pollution.
Natural England believes that everyone should have access to good quality natural green space near to where they live and have produced “Nature Nearby — Accessible Natural Greenspace Guidance” to help people make this a reality.

The guidance is aimed at decision makers, planners and managers of green space. It describes the amount, quality and level of visitor services that NE believes everyone is entitled to. ANGSt recommends that everyone, wherever they live, should have accessible natural green space:
• of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
• at least one accessible 20 hectare site within two kilometres of home;
• one accessible 100 hectare site within five kilometres of home; and
• one accessible 500 hectare site within ten kilometres of home; plus
• a minimum of one hectare of statutory Local Nature Reserves per thousand population.

Thames Path
NE note that the Thames Path will be safeguarded (page 18, Energy Strategy and Sustainability Statement) during and subsequent to the development of the area and confirms their approval of this. It is important that the Thames Path is accessible to the public at all times during the development of the area and subsequent to the completion of the development. If the Path is to be obstructed at any stage during the development process with materials from the development, then a suitable alternative “diversion” path should be made available, if necessary, and the obstructions should be removed as soon as reasonably practicable after the works have been completed.

Protected Species
NE have not assessed this application and associated documents for impacts on protected species.
Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a ‘reasonable likelihood’ of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

Royal Greenwich should apply the Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer’s responsibility) or may be granted.

Ecology and habitat creation
NE support the measures outlined on page 98 of the Design and Access Statement to strengthen the existing ecological qualities of the site and recommend that these measures are carried out in the development of the area.

NE also support the ecologist’s recommendations at pages 41 and 42 of the Energy Strategy and Sustainability Assessment and would recommend that they be carried out in the development.

Comments dated 20 July 2015:

Natural England is a non-departmental public body. NE’s statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this application poses any likely or significant risk to those features of the natural environment for which they would otherwise provide a more detailed consultation response and so does not wish to make specific comment on the details of this consultation.
Although Natural England does not wish to offer any substantive comments, they do offer the following.

The proposed widening and enhancement of the Central Park is to be welcomed and encouraged, as is the provision of a dedicated ecological park at the Southern end. The potential for links between the proposed dedicated ecology park and the existing Greenwich Ecology Park and Southern Park should be considered.

Similarly improvements to the Riverside Walkway are to be welcomed. However, the applicant is advised the River Walkway, in respect of the Thames Path National Trail, is a designated long distance walking routes, with priority for walkers. Additional access for cyclists can be considered and supported along with enhancements to the Path.

The lack of case specific comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of this site in the decision making process.

In particular, NE would expect the LPA to assess and consider the possible impacts resulting from this proposal on the following when determining this application:

**Protected species**
Where there is a reasonable likelihood of a protected species being present and affected by the proposed development, the LPA should request survey information from the applicant before determining the application (Paragraph 99 Circular 06/05).

Natural England has produced standing advice, which is available on their website Natural England Standing Advice to help local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, local planning authorities should undertake further consultation with Natural England.

**Local wildlife sites**
If the proposal site is on or adjacent to a local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the
impact of the proposal on the local wildlife site, and the importance of this in relation to development plan policies, before it determines the application.

**Biodiversity enhancements**

This application provides opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, attention is drawn to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that ‘Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’. Section 40(3) of the same Act also states that ‘conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat’.

**Landscape enhancements**

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

*Suitable conditions and included in the recommendation to secure ecological enhancements in the development.*

7.17 *Port of London Authority (PLA)*

*Comments dated 24 April 2015:*

The PLA objects to the application for the following reasons:

**Scope of the Application:**

It is noted that outline consent is being sought with all matters reserved. Specific reference is made in the description of the development to “a star ferry jetty terminal” but the red line planning application boundary appears to be extremely wide, incorporating not only the proposed location...
for the new jetty but also a number of existing piers which are outside of the ownership and/or control of the applicant (such as the cable car and North Greenwich Pier). The application documents make reference to piers, jetties and pontoon walkways and to re-activating the jetties for mooring points and water based activities. Exactly how many different things are being proposed? Without details on their location and use it is not possible to assess the appropriateness of these aspects of the development. In any event this still does not explain the extent of the red line boundary which should be tightly drawn around the areas which are subject of the application. It is considered that the red line should be re-drawn only extending into the River where works in the river or to existing structures in the river are proposed. Sufficient details should be provided on which jetties the applicant is considering for mooring points and water based activities and the plans should show the extent of the moorings in order to allow an initial assessment to be made of the appropriateness of what is being proposed. For example, due to the 30 knot speed limit in this area and the presence of a high speed passenger service it is unlikely to be viable to provide moorings for small craft or residential vessels.

It would appear that the jetty which formed part of application 13/2865/F is included in the application. The Council will be aware of the PLA’s comments in relation to this application and these need to be fully taken into account due to the jetty’s inclusion in this application.

It would appear that due to the way that the red line has been drawn, the canopy, ticketing office and the other ancillary facilities in close proximity to North Greenwich Pier, which are used in conjunction with the operation of the river bus service are included within the current planning application. Given the concerns previously raised by the PLA in relation to plots N0205, N0206 and N0207 it should be confirmed what the applicant’s proposals are for these facilities and it should be demonstrated how there will be no loss of existing facilities as a result of application 15/0716/O.

London Plan Policy Context

London Plan policy 7.26 seeks to protect safeguarded wharves for waterborne freight handling use and it states that development proposals “adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance.” Paragraph 7.79 expands on this point explaining that “the challenge is to minimise conflict between the new and the old land uses. This must be met through modifications and safeguards built into new and established developments…New development next to or opposite wharves should utilise the layout, use and environmental credential of buildings to design
away these potential conflicts. Appropriate highway access to wharves for commercial vehicles needs to be maintained when considering proposals for development of neighbouring sites.”

Policy 7.27 of the London Plan seeks to protect waterway support infrastructure such as boatyards.

Site Context

A key issue for the PLA at this site is the juxtaposition of the proposed development to the safeguarded wharves Victoria Deep Water Terminal (VDWT) and Tunnel Glucose (Wharf) and to the boatyard facility at Bay Wharf.

The Mayor of London submitted the Safeguarded Wharves Review Final Recommendation to the Secretary of State in March 2013. This document proposes a boundary change to the Safeguarded Wharf Tunnel Glucose, relocating the wharf further downstream, clustering it with other existing marine related infrastructure and renaming it Tunnel Wharf. It is unknown when the Secretary of State will make a decision on the recommendations in the Review document. For the purposes of this response, reference will be made to this wharf as Tunnel Wharf.

Currently VDWT is operational but Tunnel Wharf is not however the proposed boundary for Tunnel Wharf would, if endorsed by the Secretary of State, be located closer to the application site than the current safeguarded boundary. It is the proposed boundary that should be considered in the assessments to ensure robust assessments and a worst case scenario have been assessed. The worst case scenario should also consider all three facilities operational and with VDWT and Tunnel Wharf having the potential to operate 24 hours a day 7 days a week.

The key issues that need to be considered are site layout and design, noise, air quality, lighting, transport and access. For this particular site, given the current non-operational status of Tunnel Wharf, consideration should be given to the levels that would be generated from a re-activated Tunnel Wharf and experienced at the proposed residential receptors and at the external amenity areas. Bay Wharf has planning consent for a boatyard facility and it is anticipated that the boatyard facility that is currently located at Badcock’s Wharf will be relocated to Bay Wharf in the near future.

There appears to be some confusion as to what activities take place on which wharves. The PLA has previously provided information to clarify this. It is
not clear how the PLA’s clarification has been addressed in the ES that has subsequently been produced.

**Site Layout/Design**

Whilst there is no in principle objection to new developments being located in close proximity to a safeguarded wharf, for example at Greenwich Millennium Village residential development is being built next to Angerstein and Murphys wharves, it is essential, in line with London Plan policy that any development is designed reducing the number of habitable rooms that overlook the wharf and where possible less sensitive uses are located at the closest point to the wharf. The ES should explain how the design of the proposed development has met this requirement. For example:

- Why does this outline application depart from the previously approved multi storey car park adjacent to VDWT?
- Why does this outline application not propose to place the non residential development next to VDWT?
- Why is a school potential being placed in the blocks closest to VDWT?

The design guidelines advise that the following strategies will be adopted in order not to prejudice the operation of the wharves:

- Orientate the main aspects and principal windows of buildings away from the wharves
- Locate the maximum possible number of habitable rooms on elevations that face away from the wharves
- Employ acoustic mitigation measures to ensure noise levels within habitable rooms and outdoor amenity spaces are acceptable and complaint with relevant statutory regulation. This may include triple glazing, acoustic laminated double glazing, acoustic louvres for ventilation, acoustic screens for balconies/communal open spaces and strategic use of planting and landscape
- Raise the ground floor level about the current grade level by 2-4 metres by introducing servicing basements to further screen activity of the wharves
- Consider the effects of any potential light pollution from the wharves in the detailed design
- Introduce a landscape buffer facing the wharves

It is recommended that the starting point should be an investigation of whether less sensitive uses can be located next to VDWT. If this is not
possible then it should be clearly explained and then the design guidelines would be the next step. Without specific layouts it is not possible to ascertain whether the design guidelines will result in the juxtaposition issues being properly addressed. For example, it is stated that the maximum possible number of habitable rooms will be located on elevations that face away from the wharves. On what basis would this decision be made? Due to the indicative nature of the application it is not clear that the proposed development will satisfactorily address the PLA’s concerns about site layout and design.

**Noise**

The PLA has read the Technical Note produced by Dr Paul Cockcroft of WBM on behalf of Hanson. The PLA agrees with Dr Cockcroft’s comments and his suggested next steps. Given the extremely close proximity of the proposed development to the safeguarded wharves it is essential that the noise work is robust and that suitable mitigation measures are identified, secured, implemented and maintained. Whilst it is appreciated that the application is outline there needs to be sufficient certainty at this stage that acceptable noise levels will be experienced in the various blocks and their amenity spaces and that it is possible to design a scheme that meets the London Plan’s requirements. Planning conditions on noise and the exact specifications for acoustic mitigation should not be left until each plot of land comes forward for development and it is difficult to understand how the design guidelines will be met for those blocks that are closest to the safeguarded wharves. It is recommended that for those plots nearest to the safeguarded wharves full rather than outline details are provided.

Once the noise work has been updated in line with Dr Cockcroft’s recommendations, including the BS4142:2014 assessment relating to VDWT, any noise work undertaken in relation to the Bay Wharf planning application should be reviewed. Alternatively noise monitoring could be undertaken at Badcocks Wharf. It should be clearly explained how the boatyard use at Bay Wharf and the reactivation of Tunnel Wharf would add to the noise climate. It is questioned how the conclusion that the reactivation of Tunnel Wharf and the implementation of the Boatyard operations at Bay Wharf would not increase the noise climate significantly at residential properties was arrived at. By how much would these uses increase the overall noise levels at the closest blocks?
Air Quality

The air quality assessment uses the traffic data provided by WSP for VDWT, Bay and Tunnel Wharves (also see transport comments below) but it is not clear whether the operations themselves have been assessed. The air quality report advises that in the majority of dust generated by construction activities will be deposited in the area immediately surrounding the source (up to 350m away) and given the very close proximity of the blocks to VDWT it needs to be ascertained what levels of dust would be experienced at the application site as a result of operations at VDWT, Bay Wharf and Tunnel Wharf. Mitigations then need to be identified, secured, implemented and maintained.

Lighting

In the PLA’s response to the Scoping Opinion it was advised that wharves often work 24 hours a day 7 days a week to fit in with the tides and require appropriate lighting on site to safely undertake operations. It was therefore advised that the lighting assessments should consider the implications of an operational VDWT, Bay Wharf and Tunnel Wharf. Mitigation measures should be identified if required. The PLA has been unable to find where in the application documents this matter has been addressed.

Transport

The red line includes the main road past VDWT and Bay Wharf and the Transport Assessment / transport chapter of the ES should therefore clearly demonstrate how appropriate highways access to the safeguarded wharves and to Bay Wharf will be maintained. This should include during construction and on completion of the proposed development.

The Transport chapter of the ES identifies wharves as a sensitive receptor and then focuses on vehicle movements. The applicant envisages that vehicle trips for VDWT are within the TfL HAM model because the site was operational in 2012. It is stated that for Bay Wharf and Tunnel Wharf because no information was available assumptions have been made that should their operations commence then the same level of vehicle traffic as that associated with VDWT would be applied. It needs to be verified by Hanson that by using vehicle traffic from 2012 that this would capture representative traffic levels from their site and it needs to be checked whether there is any cap on vehicle movements at the VDWT site. Additionally the applicant is advised to review the planning permission for Bay Wharf and the transport data that would have supported that application.
River Bus Stop

The description of the development refers to “a star ferry jetty terminal” and figure 1 shows a new structure in the river, which it is understood is proposed to be a river bus stop. It is questioned whether the pier is to be provided as part of the application or whether the application just reserves the land and the pier would then be taken forward and provided by others. The transport document refers to “reserving space” and “a connection to the location” for the new pier. It does not refer to its actual provision. This matter should be clarified.

The Harbour Master has advised that the proposed pier position is in a difficult area as it is directly adjacent to the swinging point for 240m vessels for Enderby’s Wharf. The simulator trials concluded that this location needed to be kept clear to allow tug manoeuvring room to swing larger vessels. Therefore at this moment in time the PLA could not agree to a pier in this location.

Table A1 has a target for river bus use of 3.32% (year 1), +2.5% (year 3) and +5% (year 5). Table 6.3 envisages that the river would be used for 225 out of a total of 14,251 trip (am) and 190 of 13,221 trips (pm). The River Action Plan seeks to increase the number of passenger journeys on the River Thames to 12 million a year by 2020 and to maximise its potential for river travel. The targets in the river action plan reinforce the need for robust targets to be set for river bus use in connection with this development and specific measures to encourage the use of the river should be set out in any travel plan.

Navigational Equipment

As the applicant will be aware, the PLA has navigational equipment (links and radar) which has the potential to be detrimentally affected by the tall buildings which are proposed on the Peninsula. The approach to date has been for individual applications to include in their Section 106 agreements a requirement to mitigate the impact. This application will also require suitable clauses in the S106 agreement to secure the required mitigation.

The 2015 Masterplan proposal for the Peninsula has the potential to address the impact on the microwave links in a comprehensive way through the provision of navigational equipment on the roof of one of the tall buildings that are proposed. Further discussions are required on building heights and locations in order to find the optimum position for the equipment and the
PLA would like to work with the applicant as their proposals are progressed to see whether a practical solution can be identified and implemented.

Any cranes used in the construction of the proposed development have the potential to impact on the PLA’s Blackwall Stairs to Shooters Hill link. As such a condition should be placed on any grant of planning permission requiring the submission and approval of the locations of any cranes on site. In addition to this, should the cranes interfere with the link then the applicant should cover the cost of a backup ISDN line(s). This cost is around £1000 per month. With other plots on the Peninsula we have dealt with this through the developer providing a letter confirming that they will cover the costs associated with the use of a backup ISDN line(s). Such an approach may also be suitable in this case or the council may wish to cover the matter in a suitably worded clause in a section 106 agreement.

Ecology

Very limited details are provided and further information is required on the proposals in the River Thames. For example, further information is required concerning the reed beds adjacent to the drawdock and an explanation provided of what is meant by café terraces. The documents refer to incorporating an existing slipway and tidal garden. Point drawdock is an existing access/egress point to the River Thames and the proposed development should not result in the loss or down grading of Point Drawdock. Appropriate highways access should be maintained to it at all times during the construction and on completion of the proposed development. It is also questioned why it is proposed to plant reed beds adjacent to the drawdock when this has only recently been done.

The illustrative landscape masterplan appears to show works to (landscaping of) the existing ordnance jetty. Further details are required and it should be confirmed whether this is under the applicant’s control.

There are no details of the new tidal salt marsh or river wall planting. All planting should be in accordance with the Environment Agency guidance document “Estuary Edges – Ecological Design Guidance.” Conditions should ensure that there is a perpetual maintenance regime for the planting.

Phasing

The elements closest to the safeguarded wharves are proposed to be built in phase E. It is questioned whether this is the most appropriate phase to construct these elements of the development, particularly if they are to
provide for example noise mitigation for other blocks in the development. Whilst it is stated in the transport document that the new pier would be delivered by 2021, this is not shown on the phasing plan. None of the in river elements of the proposed development are shown on the phasing plan.

Use of the River during Construction

The application documentation makes reference to giving consideration to the use of the river for raw material deliveries and waste transportation. The application documents advise that the potential for transporting construction and waste materials via the River Thames should be investigated during the preparation of the CLP. This is welcomed. A condition should require the applicant to investigate using the river for the transport of construction and waste material to and from the application site. Such an approach would accord with London Plan policy which seeks for sites close to navigable waterways to maximise water transport for bulk materials particularly during demolition and construction phases.

Riparian Life Saving Equipment

Given the riparian nature of the site, it is recommended that a condition requires the provision of life saving equipment (such as grab chains, access ladders and life buoys) to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety.

External Lighting

The submitted details indicate that the lighting will be designed to avoid light spillage particularly near the River Thames and a number of key principles have been set out. This is welcomed. Given the proximity of the proposed development to the River Thames, a condition should require full details of all external lighting to be submitted and approved. Such details should clearly explain how the lighting has been designed to minimise impact on the ecology of the River Thames and vessels navigating on the River Thames.

Other Consents

The applicant is advised of the need for a river works licence for any works in, on or over the River Thames, this includes any works to the river wall, outfalls (given the proposal to utilise previously installed gravity outfalls to the River Thames and to consider the opportunities to drain further areas of the 2015 Masterplan direct to the Thames via gravity) and/or any crane.
oversailing. The applicant is advised to contact the PLA’s Licensing Department to discuss this matter further (lic.app@pla.co.uk)

**River Wall Strategy**

Changes to the river wall are noted but no details provided. Full details should be provided. The construction methodology and timing of the works should be designed to minimise impact on river wildlife.

**Conclusions**

As set out above due to the outline nature of this application and the complex juxtaposition issues that arise when developments are proposed in close proximity to safeguarded wharves it has not been possible to satisfactorily demonstrate that the London Plan requirement to minimise the potential conflicts between the wharves and the proposed development has been met. As such the PLA objects to the application. It is recommended that full details are provided of those elements of the development closest to the wharves in order to try to address this matter.

*Comments dated 27 August 2015:*

The PLA has been in discussions with Knight Dragon about the proposed development and these discussions have focused on the PLA’s response to Greenwich Council dated 24 April 2015. Good progress has been made, but unfortunately it has not been possible to reach agreement in all areas. As such the PLA maintains its objection to the proposed development.

For ease the PLA’s response to the additional information/revisions largely follows the same format as its original response to the application. As you will appreciate, further information/clarification has been provided by the applicant during the course of our discussions and I have attempted to capture this in my response. As the information/clarification will not form part of the documentation submitted to the Council, it is recommended that a cross check occurs with the applicant to ensure that where progress has been made, there is a clear, agreed and documented way forward.

**Approach**

Outline consent is sought with all matters reserved. It is then proposed that zonal masterplans would be prepared (containing more detail than the outline application) and reserved matters applications for the zone will then be required in compliance with the individual zonal masterplan and the

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masterplan parameters and planning conditions. There is no in principle objection to this approach. Clearly such an approach and the scale of the development itself, will result in the site being developed over a substantial period of time. It is necessary to secure the overarching protection of the safeguarded wharves and Bay Wharf at this outline stage but sufficient flexibility needs to be built in, in order that the ultimate design of the applicant’s development responds to any changing circumstances between the grant of outline planning permission and the plot being built. The PLA would therefore wish to review and comment on the wording of all relevant planning conditions at each stage to ensure that the protection that is required for the wharves is maintained at each stage.

The Development Specification sets out the elements of the 2015 Masterplan which are for approval. This document needs to be read together with, and provides further explanation and detail of, the Parameter Plans and the Design Guidelines document (which controls and fixes certain elements of the design of the masterplan).

The Design Guidelines advise on page 11 that in Meridian Quays a series of mitigation measures will be employed for residential buildings adjacent to safeguarded wharves to the south; it will be ensured that the detailed design of the proposed residential development neighbouring the wharves will employ appropriate mitigation through layout, and environmental credentials of buildings to minimise the potential for conflicts of use and disturbance between the new and existing land uses.

Further information and the approach to wharves is set out in detail on page 55 of the design guidelines. These include aspects relating to layout (orientation of main aspects and principal windows away from the wharves and locating the maximum possible number of habitable rooms on building elevations that face away from the wharves) noise and light pollution. Amendments to the Design Guidelines and the Development Specification have been agreed during the course of the discussions between the PLA and Knight Dragon and this is explained in further detail below.

**Red Line Planning Application Boundary**

Despite extensive discussions, agreement has not been reached on the red line planning application boundary. The PLA continues to assert that the red line is too wide ranging, extending for some distance into and along the River Thames. It incorporates land and a number of structures outside of the applicant’s ownership and control – this in itself raises questions about whether what is proposed will be capable of being implemented.
The PLA remains concerned about the extent of the red line boundary particularly as “the application site is outlined in red – within which the development forming this application is proposed.” The applicant has also confirmed to the PLA that “the purpose of the red line is to include all land necessary to carry out the proposed development” (emphasis added) and “one of the reasons the red line boundary was drawn as is (and accepted by RBG as the local planning authority) was to allow for flexibility i.e. changes to the location of the Meridian Quays Jetty” (emphasis added). The PLA reiterates that controls need to be established at this outline stage, to set the parameters within which any ZMP and/or detailed design stages are progressed. The PLA does not want there to be flexibility as flexibility could directly impact on navigational safety.

The applicant has also advised that they do not wish to have to revisit the red line boundary “to accommodate the logistics of river movements.” It is unclear what river movements are proposed – if it is the use of the river for the transport of construction and waste materials to and from the development site, then the PLA would question why this has to be included in the red line – no other developments in Greenwich have included this in their red line boundaries. If it is river movements to jetties within the masterplan area, again this is not usually included within a red line boundary plan.

The applicant has confirmed that whilst it is stated in appendix 6 that no changes are proposed to the existing piers identified on drawing 07-071 and the application documents refer to pier, jetties and pontoon walkways and to-activating the jetties for mooring points and water based activities “the only works proposed by the outline application to the Jetties is the new jetty at Meridian Quays” and that the reference to re-activating the jetties is in the context of ensuring access to them remains.

This is a very busy, navigationally important and complex stretch of River where cruise ships turn. There is a speed limit of 30 knots (compared to more restrictive speed limits elsewhere on the River). Certain uses will not be acceptable on navigational safety grounds in certain locations. The PLA therefore objects to a red line boundary that requires for example, parts of the river which form the navigable channel in order to carry out the proposed development (shown on the attached annotated drawing for the area around the proposed new pier). The PLA’s approach to new works in the river is clearly set out on our website: “as a rule, no new works will be permitted to extend into, or interfere in any way with the main navigation, or where applicable, any recreational vessel channel”
The red line should be re-drawn only extending into the River where works in the river or to existing structures in the river are proposed. This will allow an assessment to be made on the appropriateness of these aspects of the development – particularly from a navigational safety perspective. Given the progress that has been made in relation to the location of the river bus stop then there is no reason why the red line boundary cannot be re-drawn.

The applicant has suggested the following to address the PLA’s concerns:

“Prior to commencement of development related to jetties, full details of the use and any structures proposed shall be submitted and approved by the Local Planning Authority in consultation with the PLA. The scheme shall thereafter be implemented in strict accordance with the approved details.

Informative: In addition any works to the jetties will require a Licence from the PLA and hence further controls and assurances are in place through the consenting procedure which covers other matters over and above planning such as civil engineering works.

Jetty Operation and Management. Prior to the commencement of development on the jetty, full details of a strategy for the operation and management of the proposed use of the jetty including an assessment on the PLA navigational equipment shall be submitted to and approved in writing by the local Planning Authority prior to use of the Jetty.

Informative: Any works proposed over Mean High Water require a river works licence from the PLA and potentially an amendment will be required to the extant Jetty at Meridian Quays. The PLA will continue to discuss this matter with the applicant.

Hydrodynamic Modelling

Prior to commencement of any construction in the river Thames, hydrodynamic modelling and a navigational risk assessment shall be submitted to and approved in writing by the LPA. This should assess the impact of the proposed structures in the river, including all piles, dredging and worst case scenarios for moored vessels.”

There is no in principle objection to these conditions and informatives, which should also include a reference to the completion of a navigational risk assessment however, the conditions should be applied in the context of a revised red line boundary.
Public Realm

The design guidelines document needs updating to reflect that the new location for the river bus stop is at Meridian Quays Park, rather than at Meridian Quays Jetty.

The applicant’s ability to deliver the public realm works is questioned when for example the terraces and slipway are not under the applicants ownership or control. Further details will be required of these aspects of the development in due course in order for the PLA to assess the appropriateness of what is being proposed. The Council should note that relying on land outside of the applicant’s control for some of the public realm works may ultimately impact on their deliverability. This could call into question the conclusions in the ES if for example the ecology work to the terraces is not delivered, what does that mean for the conclusions in the ecology chapter of the ES?

Noise

In order to secure the overarching protection of the safeguarded wharves and Bay Wharf, the now well established noise criteria which relate to phases 3, 4 and 5 of Greenwich Millennium Village (updated as necessary to reflect changing guidance/legislation) should be imposed on any grant of planning permission for application 15/0716/O. These have been provided separately as agreed for GMV for ease of reference.

Following discussions:

- Criterion 1 – it has been agreed that this should be imposed as per its current wording. For information the applicant envisages that non openable windows would be required for the whole of PQ South and for approximately 50% of PQ North.
- Criterion 2 - agreement not reached. The PLA maintains that criterion 2 must be imposed, unaltered from the wording established by GMV. The low frequency noise that has been observed at GMV is dominant in the 50Hz one-third octave band, therefore the 63Hz octave band criterion must be maintained.
- Criterion 3 – it has been agreed that this should be updated to reflect the new guidance: BS 8233: 2014 and that the reference to mechanical services noise can be removed
- Criterion 4 – it has been agreed that this should be updated to reflect the new guidance: BS 8233: 2014 and that the reference to mechanical services noise can be removed
Criterion 5 - it has been agreed that this should be updated to reflect the new guidance: BS 8233: 2014. It has also been agreed that the word “public” can be removed from criterion 5 on the basis of the inclusion of a 5m high barrier on the site boundary between VDWT and the MQ area as set out in section 4.4 of the RPS Initial Noise Assessment dated 23 June 2015. Section 4.4 states “The model includes a barrier of 5m on the site boundary between the VDWT and the MQ area, which will likely be required in order to ensure suitable aural and visual environments for pedestrians at ground level and for any external recreation areas.” No other amendments to the wording of criterion 5 are agreed.

Criterion 6 – agreement not reached. Whilst it is acknowledged that BS8233:2014 does not provide LAFmax value, the criterion should be updated to include a reference to BS:8233:2014 and should be retained until such time it is demonstrated that it can be achieved.

In relation to criterions 3 and 4 it is important that they include all external noise sources (i.e. Criterion 1 plus night-time [daytime] traffic / environmental sources). When it comes to the “scheme for testing” as required by GMV condition 88 (and a similar condition is required for this application) it needs to be clear whether the internal ambient noise levels are measured and reported separately with the mechanical ventilation system operating and with it switched off. The condition should state that measurements should be made and reported separately of the internal ambient noise level with the mechanical ventilation system operating and with it switched off.

The PLA welcomes the revision to the Development Specification, which now includes a requirement to complete an “Initial Noise Assessment to inform design mitigation strategy (In relation to the Zonal Masterplans adjacent to the VDWT (Zonal Masterplan A and E)).” The carrying out of a noise assessment at the zonal masterplan stage (in addition to the noise work that has been carried out in support of this outline application) will allow for an up to date assessment of the noise impacts from the safeguarded wharves to be undertaken to inform the mitigation. As identified in Appendix 6 a condition on the zonal masterplan would then require further noise work to be carried out prior to the commencement of the reserved matters application on zone A and E and a condition would require the submission and approval of a scheme for protecting the dwellings from noise should explain how they are in strict accordance with the noise criteria established at this outline planning permission stage.
Air Quality

Whilst it is appreciated that monitoring may be required along with modelling to determine air quality impacts and that this may take time, it needs to be established whether there will be unacceptable impacts from the operations at the safeguarded wharves on the application site, particularly given the distance that residential development and open space is proposed from the wharves.

The Design Guidelines and Development Specification currently provide for no further consideration of any potential air quality impacts from the wharves on the application site, in the detailed design nor the identification and securing of any appropriate mitigation. The applicant has advised that they will include a further clause and a condition will also be imposed requiring further air quality assessments to be undertaken for the relevant parts of the development. For the avoidance of doubt, the same staged approach to noise and lighting must be employed for air quality and the Design Guidelines and Development Specification updated accordingly to secure the consideration of potential air quality impacts from the wharves on the application site at the zonal masterplan stage for zones A and E. Conditions on the zonal masterplan should then require further air quality work to be carried out prior to the commencement of the reserved matters application on zone A and E and a condition should require the submission and approval of a scheme for protecting the dwellings from dust.

Lighting

Whilst it is agreed that wharf operators have to employ best available techniques, this application is proposing to introduce residential development considerably closer than any existing residential development. The emphasis is therefore on the applicant to consider the impacts of lighting from the wharves on their application site and secure appropriate mitigation.

Through discussions the following has been agreed:

1. Amend the Design Guidelines Page 55 - 5th bullet point to state: “Consider the effects of any potential light pollution from the wharves as well as identifying and securing appropriate mitigation in the detailed design, although the assumption is that operators will comply with statutory legislation with regard to light pollution”

2. Amend the Development Specification - section 3.b.ii to state:
'An initial assessment of the impact of the uses and locations of open space and maximum block heights on future amenity within the Zone and on neighbouring properties including:

- Impact on privacy
- Sunlight/daylight
- Potential night-time light pollution (from existing neighbouring uses);
- Microclimatic analysis; and
- Initial Noise Assessment to inform design mitigation strategy (in relation to the Zonal Masterplans adjacent to the VDWT (Zonal Masterplan A and E).

Initial Lighting Assessment to inform the design mitigation strategy (in relation to the Zonal Masterplans adjacent to the VDWT (Zonal Masterplan A and E)

The following condition has also been agreed in relation to lighting:

“Full details of lighting and external illumination for the relevant part of the development shall be submitted to, and approved in writing by, the Local Planning Authority prior to the occupation of the relevant part of the development. Such details shall demonstrate that the lighting has been designed to minimise potential impacts on navigation and ecology and include a strategy for the lighting to be adjusted should it be found to be a hazard to navigation once it has been installed.”

Transport

The PLA welcomes the clarification that access to the safeguarded wharves will be maintained at all times during construction and following completion of the development and that there are no changes proposed to the access arrangements for the wharves.

The applicant advises that whilst the final set of highway improvement measures is yet to be determined it may be possible that access/egress to the wharves might be improved as part of the 2015 masterplan. The PLA awaits further details on this at the appropriate time.

The PLA would wish for the safeguarded wharf operators and the operator at Bay Wharf to be consulted on the final set of highway improvement measures to ensure that they are appropriate for the vehicles that access and egress their sites.
River Bus Stop

The river bus stop’s location has now been overlaid on a PLA chart (attached) – it is positioned over Delta Wharf, which is still in situ. The current proposal remains very close to the swing area for cruise ships, but is an improvement on the previous location. It is likely that the pier will need to be moved further inshore or slightly further downstream of its current position (keeping the pier within the footprint of the existing structure or only very slightly further out into the river). Further detailed work will be required in due course and consistent with the comments on public realm and ecology as a licensed structure it will be necessary to reach agreement with the extant licensee concerning the future of the existing structure – if the licensee does not agree to its use or removal then it will not be possible to implement the river bus stop.

Navigational Equipment

The further information/clarification is noted. The PLA expects a combination of suitable clauses in a S106 agreement and planning conditions to secure appropriate mitigation of the impact of the proposed development on its navigational equipment.

Ecology

It remains unclear what the applicant is proposing in terms of ecological enhancements and how they can deliver them. As referred to above, neither the slipway or the existing terraces are under the applicant’s ownership or control and neither is Ordnance Jetty. Having an ecology plan that relies on the use of others works results in uncertainty as to whether the works can be secured and raises questions about conclusions reached in the ES.

Additionally because it is not clear what the ecological enhancements are, it is not clear where they will be – for example there may be ecological enhancements proposed anywhere within the red line boundary – which as highlighted above would not be appropriate from a navigational safety perspective – again this emphasises the need for the red line to be tightly drawn around the exact areas where works are proposed.

Phasing

It will be important to secure an appropriate phasing plan at the outline stage to understand how the overall site is to be developed. If the blocks closest to the safeguarded wharves are not being provided at an early stage then they
will not form a buffer between the safeguarded wharves and other residential development that is proposed on the site. In this scenario additional mitigation may be required to the blocks further away from the safeguarded wharves until the buffer blocks are provided. This mitigation will need to be agreed secured and implemented.

It will also be important to secure the early provision of the river bus stop. It is understood that the ZM for A is going to be one of the first ZM coming forward and that this includes the new river bus stop. It is also understood that as part of the ZM submission for zone A that it is a requirement of the ZM specification for a phasing plan to be submitted to demonstrate how the zone will be built out and that this will include the river bus stop.

**Use of the River During Construction**

No further comments

**Riparian Life Saving Equipment**

No further comments

**External Lighting**

No further comments

**Other Consents**

No further comments

**River Wall Strategy**

The PLA has no objection to the imposition of a condition that requires the submission and approval of details relating to works to the river wall.

*Suitable S106 Obligations, conditions and informatives have been included to address these comments.*

*The red line boundary reflects in principle the same red line as that defined on the 2004 permission. Also application 13/2865/F for plots M0104 and M0121 took a similar approach with extending the red line into the river, without objection from the PLA. The areas which have been excluded from the 2015 red line boundary are generally those areas which have been built, are under construction or are permitted and are due to be built and no further changes are required as a result of the*
The purpose of the red line is to include all land necessary to carry out the proposed development. At this stage in the process, given the application is outline, it is unclear to the extent of the works which will be required to the river wall, jetties, etc and therefore, it would not be appropriate for the red line to be tightly drawn around the river edge or existing jetties. It should be noted that the applicant does not need to be in ownership of all the land to which the red line relates to, so long as the relevant certificate has been issued and notices served. The applicant has complied with this.

For the avoidance of doubt the only works proposed by the outline application to the jetties is the new jetty at Meridian Quays as defined in the description of development and shown on parameter plan 07-071. The DAS makes reference to ‘pier, jetties and pontoon walkways and to-activating the jetties for mooring points and water based activities.’ in the context of ensuring access to them remains.

This is an outline application to be implemented over a 20 year period. There are controls in place at the ZMP and Reserved Matters stage for the detailed design and implementation of the development. One of the reasons the red line boundary was drawn as is was to allow for flexibility i.e. changes to the location of the Meridian Quays jetty – this is recognised in the PLA’s response under ‘River Bus Stop’. If the boundary were to be drawn as tightly as suggested, the jetty would have fallen outside the application boundary. Furthermore the applicant does not want to have to revisit the planning application boundary to accommodate the logistics of river movements for the benefit of all users of the river. Any development in the river or affecting the river would have to the subject of further design and application and therefore consultation to ensure it meets all required legislative and planning standards. Both the Council and the PLA therefore retain a role in such details moving forward.

7.18 NHS Greenwich Clinical Commissioning Group (CCG)

Comments dated 16 July 2015:

All the various bodies responsible for NHS commissioning for the population of Greenwich have been consulted by the CCG, and this response is sent by the CCG and on behalf of NHS England, NHS Property Services, and Community Health Partnerships.

The outline planning application proposes a mixed use redevelopment including up to 12,678 residential dwellings, up to 220 serviced apartments, commercial uses and community uses including Class D1 health care facilities up to 1,462m2.
The new Masterplan would result in up to 15,500 dwellings, including the 2,822 units already given detailed planning permission.

Healthcare impact
The applicant’s Environmental Statement socio-economic assessment states that the planning application would be expected to yield approximately 22,320 people using the GLA Population Yield Calculator. It is assumed that this calculation is based on the 12,678 units proposed and not the total 15,500 dwellings including the 2,822 consented units, and is based on the housing mix in Table 4.3 of the Environmental Statement, which doesn’t include a proportion of affordable housing. If the consented units are added, then the population yield would be approximately 27,290 people. The CCG would appreciate clarification on this point.

The Environmental Statement refers to 16 GP surgeries within 2km of the site. 12 of these practices are in north of the River Thames in Tower Hamlets and Newham and will not be accessible to new residents of Greenwich Peninsula – so it is rather disingenuous to include these. It is also incorrect to assume that practices accepting new patients have surplus capacity. The nearest practice is the Greenwich Peninsula Practice at the Millennium Village Health Centre, which is expected to be able accommodate some of the population growth. The next nearest practices are Woodlands Surgery (Dr Ratnarajan and partner) and the Vanbrugh Group practice are 1 km away. The Vanbrugh Group practice is moving into the new Greenwich Square development, and has already absorbed a high level of growth into its list from the east Greenwich developments.

Using the Department of Health guidance in Health Building Note 11-01, a patient list of 22,320 would generate a space requirement of 1,910m². This space requirement will vary according to opening hours (as commissioners look to extend GP hours 8am – 8pm to reduce A&E demand), room utilisation and the extent of community services provided in the building (again as commissioners look to transfer services out of hospital into new models of federated GP provider provision).

The planning application proposes three health facilities in three different development zones totalling 1,461m². Although the patient list size at the Greenwich Peninsula Practice has been growing, the premises have the capacity to absorb additional demand. The CCG’s preference would be to utilise the potential capacity of the Greenwich Peninsula premises in the first instance, before investing in new premises. However, a new health facility or facilities will need to be operational before the Peninsula Practice at the Millennium Village Health Centre is at capacity. Therefore the CCG would
urge that plans are made and enacted sooner rather than later for a new facility. The CCG is worried that a new facility may not be available soon enough to prevent the current practice capacity to be completely filled up (even with the space currently available at the Millennium Village Health Centre), and it would be prudent to ensure that there was still some capacity at the Peninsula practice as there will remain the need for capacity as the southern part of the peninsula undergoes further development.

The preference would be for a single new facility of 1,300 to 1,500 m² close to the North Greenwich Transport Interchange, but all options will need to be examined. The CCG would welcome the opportunity to work with the local authority to define future requirements, assessing existing and future health needs, service requirements and costs. In particular, there is the need to plan strategically; taking into account the cumulative impact of development in the wider Greenwich Peninsula area where up to 20,000 new homes could be built.

Health Impact Assessment
It is noted that a brief ‘health impact assessment’ is included within the planning statement. The assessment uses the issues/headers identified in the NHS London HUDU Rapid Health Impact Assessment Tool. However, the assessment doesn’t provide any detail or evidence to demonstrate how the positive impacts or benefits can be achieved or enhanced and it doesn’t identify any negative impacts and recommend mitigation.

The HIA makes a bold statement that the development proposals will contribute to reducing health inequalities. The CCG questions how this will be monitored and measured, or indeed whether this statement can really be evidenced. They would strongly suggest that a set of health and wellbeing principles are established to guide the zonal Masterplans (not just this plan but also the work the borough is undertaking in areas such as Charlton Riverside) and reserved matters applications. This should be developed in conjunction with the Director of Public Health, and also adopt the principles of Living Streets agreed in the borough’s Health and Wellbeing Strategy.

All of the NHS agencies look forward to working further with Royal Greenwich to ensure that the needs of existing and future residents on the Greenwich Peninsula, and more widely across the entire Royal Borough are met.

*The application has been amended so that one health facility will now be provided in Peninsula Central, rather than three locations in the residential neighbourhoods.*
It is considered that the development proposals include a broad range of characteristics to encourage a healthy community in the development.

7.19 London Fire and Emergency Planning Authority (LFEPA)

Comments dated 15 April 2015:

The premises referred to in the consultation letter is not currently due for an inspection under the risk based re-inspection programme operated by the LFEPA.

The premises will be inspected in line with the LFEPA’s risk based re-inspection programme at which time they will review the fire risk assessment as required for premises where a licence is in force under an enactment.

Comments dated 18 August 2015:

The Brigade has been consulted with regard to the above-mentioned premises and makes the following observations:

The Brigade is not satisfied with the proposals for the following reasons:

- Insufficient detail is shown for full approval to be made. Principles and recommendations of the relevant British Standard BS 5588 Part 11, current Building Regulations and the appropriate Fire Safety Guidance Document(s) should be followed in the provisions of fire precautionary arrangements.

- Access for Fire Brigade appliances is to be provided in accordance with Brigade document Fire Safety Guidance Note 29.

- 3 copies of a site plan are to be forwarded for consideration of water supplies for fire fighting purposes to the Water Section, LFB

The Brigade strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is the Brigade’s policy to regularly advise its elected Members about how many cases there
have been where they have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to their Members are public documents which are available on the Brigade’s website.

These comments are noted and have been passed on to the applicant. Suitable informatives have been included.

7.20 Health and Safety Executive (HSE)

Comments dated 17 August 2015:

1. The HSE refer to the Council’s letter of 23 March 2015 consulting the Health and Safety Executive (HSE) under Article 18 of the above legislation on Application 2015/0716/O for outline planning permission, and the later letter of 14 July re-consulting HSE on the same application following the revisions of June 2015.

2. HSE is a statutory consultee for certain development proposals within notified areas (ie HSE Consultation Zones (CZ)) around major accident hazard sites and pipelines. There are two nearby sites with Planning (Hazardous Substances) Consent; Brenntag UK, Tunnel Avenue and the East Greenwich Gasholder Station.

3. HSE’s public safety advice to planning authorities is provided on the basis of the compatibility of adjacent land uses, taking in to account the residual risk of a major accident arising from the activities that are permitted to take place under planning law. It is for this reason that HSE’s advice is based on the fact that hazardous substances consent is in place for the storage of natural gas at above the controlled quantity at the East Greenwich gasholder. [National Planning Practice Guidance on hazardous substances, Paragraph: 068, Reference ID: 39-068-20140306]. Whilst this consent remains in place, and the gasholder is still capable of being brought back into use, the storage of natural gas can be carried out at any time to suit the purposes of the person in control of the land without any need to make an application to the local authority, or for consultation with HSE.

4. The operator of the East Greenwich gasholder station, Southern Gas Networks (SGN) has written to HSE advising of the current non-operational status of the gasholder. Thereby dis-applying, for the time being, the regulatory requirements of the Control of Major Accident Hazards (COMAH) regulations. However, as far as HSE is aware, SGN
have not put in writing their intentions regarding the hazardous substances consent that they hold.

5. In reaching a decision on the planning application the planning authority needs to be aware of the residual risk of a major accident on the proposed developments from the storage of hazardous substances that is permitted under planning legislation. The planning authority may take into account the current operational status of the major hazard site as a material consideration at the time the decision is made. However, HSE's public safety advice is based on the permitted presence of hazardous substances.

6. The statutory LUP advice below is based on the information available for Application 2015/0716/O, as revised in June 2015, on the Royal Borough of Greenwich’s website and, in particular, on Drawings Nos. 07-072 (Revision P01), 07-074 (Revision P01), 07-075 (Revision P01) and 07-076 (Revision P01) and associated supporting documents. If the application is revised further in the future, particularly in respect of the proposed predominant uses of designated areas, then HSE would wish to be consulted again.

7. HSE's detailed advice includes a number of conditions and explanations to support the council in considering most carefully the specific circumstances of the risks from the two sites with hazardous substances consent and for the council to act in full understanding of that advice and the consequences that could follow.

8. HSE would usually advise that there are sufficient public safety grounds for refusal of a proposal of this type and intensity near major accident hazard sites or pipelines. However, in view of large area of land involved (much of which falls beyond the HSE CZs), the zoning of the proposed redevelopment and the sub-division of the zones into Development Parcel and Plot Numbers (as shown on Drawing No. 07-072 (Revision P01), HSE is able to provide bespoke detailed advice on Application 2015/0716/O. The HSE's land use planning advice is based on the named area, zone and/or Parcel and Plot Number, as appropriate.

Central Park

9. In view of the pre-existence of open park land at this location, HSE's advice is that there are insufficient public safety grounds for permission to be refused for this element of the redevelopment. However, whilst the hazardous substances consent for the East Greenwich Gasholder Station remains in force, HSE would not encourage the provision of
dedicated playgrounds, where children might congregate in significant numbers, on the gasholder side of the park.

Zone A (excluding Central Park), Zone D and Zone E
10. In view of the predominant uses proposed in these areas and the associated levels of residual risk, HSE's advice is that there are insufficient public safety grounds for permission to be refused for these elements of the redevelopment.

Zone B
11. In view of the proposed film studio use of Parcel 15 and the predominant residential uses of Parcel 16 Plots 01 - 04, and the location of these areas within the HSE higher residual risk Inner and Middle CZs around the gasholder station, HSE's advice is that there are sufficient public safety grounds for permission to be refused for these elements of the redevelopment. However, the HSE would withdraw this advice if any planning permission included a Grampian-style condition which prevented occupation of all development within this zone until the hazardous substances consent(s) for the East Greenwich Gasholder Station had been revoked in accordance with the provision of the Planning (Hazardous Substances) Act 1990, as amended, and written confirmation of revocation had been issued by the Hazardous substances Authority.

Zone C (excluding Central Park)
12. In view of the predominant uses of Parcel 22 Plots 02 & 03 and of Parcel 18 Plots 02 & 03 and their locations either within or beyond the lower residual risk Outer CZ, HSE's advice is that there are insufficient public safety grounds for permission to be refused for these elements of the redevelopment.

13. In view of the predominant residential uses of Parcel 17 Plots 01 & 02 and Parcel 22 Plot 01, and the predominant D1 use (eg school or day nursery) of Parcel 21, and their locations within the higher residual risk Middle CZ, HSE's advice is that there are sufficient public safety grounds for permission to be refused for these elements of the redevelopment. However, the HSE would withdraw this advice if any planning permission included a Grampian condition which prevented occupation of all development within these Parcels/Plots until the hazardous substances consent(s) for the East Greenwich Gasholder Station had been revoked in accordance with the provision of the Planning (Hazardous Substances) Act 1990, as amended, and written confirmation of revocation had been issued by the Hazardous substances Authority.
14. In view of the proposed D1 use of Parcel 18, even though it is mostly located within the lower residual risk Outer CZ, HSE's advice is that there are sufficient public safety grounds for permission to be refused. However, it should be noted that the level of residual risk over part of this area (ie that beyond the CZs) is insufficient to require consultation with HSE, and that all people inside buildings anywhere on the Parcel would be protected against the effects of foreseeable major accidents at the gasholder station. Furthermore, a full planning application has already been made for a school on Parcel 18 (Application 15/1910/F) and that, based on HSE pre-application advice, the layout has incorporated risk reduction so that those children out-of-doors would be located either in the outer region of the lower residual risk Outer Consultation Zone or beyond the CZ altogether. The applicant has informed HSE that they would exclude children from the open area of the proposed school layout closest to the gasholder until the hazardous substances consent(s) for the station has been formally revoked and would accept a Grampian condition to this effect. Therefore, whilst the level of residual risk at Parcel 18 is sufficient, generally, for HSE to advise refusal of D1 uses there, Application 15/1910/F includes significant risk reduction whereby the residual risk to children inside the buildings would be insignificant and to those out-of-doors would be very low provided they were excluded for the open area nearest the gasholder until the hazardous substances consent(s) has been revoked.

15. The HSE draws attention to paragraph 072 of the Hazardous Substances section of the Communities and Local Government's Planning Practice Guidance web-based resource which guides that a local planning authority minded to grant permission against HSE's advice should give advance notice of that intention and allow 21 days from that notice for the HSE to give further consideration to the matter. However, if the council resolves to grant permission subject to the Grampian conditions proposed above, then HSE would wish to be consulted on the wording of those conditions.

16. In summary, subject to the above conditions, HSE would not advise against the granting of planning permission for the vast majority of the development. There is significant scope to address HSE's concerns over parcel 18, identified for use as a large secondary school in the outer zone of the gasholder.

Comments dated 20 August 2015:
The HSE can confirm that paragraph 14 of Mr Reston's letter (and indeed paragraph 16) should have referred to Parcel 18 Plot 01 and not to Parcel 18 as a whole.

Secondly, the Greenwich Planning officers are correct in their interpretation of the first part of paragraph 14 in that all people inside buildings anywhere on Parcel 18 Plot 01 would be protected against the effects of foreseeable major accidents at the gasholder station. Furthermore it is also correct that, in view of the protection afforded by the buildings, HSE's advice that there are sufficient public safety grounds for permission for D1 use to be refused is based on the level of residual risk to groups of children in any open areas (i.e. not within buildings) on Parcel 18 Plot 01.

Finally, the HSE accepts that whilst a full application has already been made for a school on Parcel 18 Plot 01 (ref 15/1910/F) there is no guarantee that it will come forward in that manner. Therefore, in view of the outline nature of the application ref 15/0716/O, the HSE would provide the following further advice regarding the proposed D1 use of this area of land. If any permission included a Grampian condition which prevented children congregating in numbers (supervised or unsupervised) in open areas (i.e. not inside buildings), for example on sport pitches, playgrounds or at school bus waiting points, on Parcel 18 Plot 01 within 375m of the centre of the gasholder until the hazardous substances consent(s) for the East Greenwich Gasholder Station has been revoked then the residual risk would be significantly reduced such that the risk to children inside buildings would be insignificant and to those out-of-doors would be very low.

Suitable conditions and informatives have been included. The application is recommended for approval and will be referred to the HSE if Members resolve to approve the application.

7.21 Met Police - Design Out Crime Officer (DOCO)

Comments dated 12 August 2015:

The DOCO would seek for a condition on a project of this scale and importance to be entered, stating that any developments within this Masterplan must achieve Secured by Design accreditation (Part 1 design and layout and part 2 physical security and any part 3 where needed) or the latest equivalent to help prevent crime, criminality and anti-social behaviour for decades to come.

The requested condition has been included.
Comments dated 19 August 2015:

Thames Clippers support the proposal for a new pier on the western side of the peninsula to enhance the accessibility of the site by River Bus. To maximise the potential of the service, the location of the pier will be critical to capture demand from the residential and office elements of the scheme, as well as footfall from the AEG hotel and The O2. A new pier is also proposed on the eastern side of the Isle of Dogs (target delivery date of late 2016 / early 2017). This is subject to planning consent but London River Services and Thames Clippers are both stakeholders in this project. The introduction of a new cross river link between the Peninsula and the eastern side of Canary Wharf could therefore be possible. Thames Clippers would welcome the opportunity to explore operating such a service.

The pressure on the Jubilee Line will continue to grow, even with Crossrail, so the introduction of such a short crossing could assist with alleviating the 'one stop' congestion between North Greenwich and Canary Wharf. It would meet one of the Mayor’s Transport Strategy targets in the delivery of a local river crossing alongside the more strategic road crossings (Silvertown). In 2013 the Mayor also launched the River Action Plan, with an overarching aim of doubling passengers on the river by 2020. The introduction of such a service would support the delivery of this objective.

Such a service could comfortably accommodate up to 1m passengers per year with the right craft and frequency. Vessel concept designs have already been considered which would cater for both pedestrians and cyclists, further increasing the pier catchment. Similar schemes have been introduced in Holland with the vessels and piers allowing customers to cycle down the pier and straight onto the vessel (cycle on / cycle off concept).

It is understood there are significant CIL payments attributed to the Knight Dragon scheme so Thames Clippers believe that this should be allocated for the benefit of the Peninsula. New pier infrastructure and the operation of a cross river service could be delivered for relatively minimal investment in the context of other transport schemes in London. Thames Clippers would therefore urge the Borough not to overlook the potential of the river crossing when allocating the CIL funding and assessing enhancements to the local public transport network. The river should also be a key element of a development travel plan agreed with the Borough. As with some new river projects the operation would require an element of ‘pump priming’ during the
formative years of operation. This has yet to be determined but Thames Clippers would be pleased to scope the potential service and costs for such a project.

Overall Thames Clippers welcomes the redevelopment of the Peninsula and supports the application, subject to the above considerations.

*The Council will consider appropriate requests for CIL funding from its CIL receipts.*

**Internal Consultees**

7.22 **Greenwich Design Review Panel (GDRP)**

*Comments dated 24 April 2015:*

The site offers the opportunity to bring a large piece of land back into use, redefine the setting of an iconic London landmark, the O₂ Arena, and create a new thriving community in Greenwich. The GDRP supports the changes to the previous Masterplan, particularly the clear movement strategy, the large Central Park and the way the scheme engages with the river. Some aspects of the Masterplan will benefit from further refinement, for example the articulation of the individual neighbourhoods and the design of the central park. The success of the overall Masterplan will depend on how the proposal will be translated into a detailed design framework for the individual blocks.

**Masterplan**

The GDRP is impressed by the principles of this masterplan proposal and the clarity of the layout. The Thames is a key asset of the scheme and it is heartening to see how the site is reconnected to the river. The spatial diagram strengthens the Central Park, makes access to the O₂ Arena and the new Transport Interchange simple and legible; and creates a vibrant heart at the Design District. The Panel sees much to admire in the design and layout of Meridian Quays and Lower Riverside and their relationship to the Thames and the new open spaces.

The disposition of tall buildings is creating a unique character, particularly in the western part of the masterplan where a compelling, diverse townscape has been achieved. Along the eastern edge of the site where the original plot layout is already being built out, the three-dimensional articulation of the masterplan seems less successful and the Panel suggest, reassessing this part of the Greenwich Peninsula. Reorganising the layout of this part of the masterplan should include revisiting the location and wall like appearance of
the tall buildings along Western Parkside so more units can benefit from views of the park.

Uncertainty over the future of the gasholder site hinders the planning process and has the potential to undermine the quality of the site in terms of ensuring the wider connectivity of the site and creating a pedestrian friendly western edge. It is recommended that the client team should work collaboratively with the local planning authority to keep this aspect of the masterplan under review while the decommissioning process of the gas holder is under way.

**Movement network**
The masterplan encourages use of river transport, proposes a clear hierarchy of roads and successfully addresses the change of levels across the site. However, some of the detailed movement network aspects can be further developed. For example, the impact of noise and pollution on the western neighbourhoods from Blackwall Tunnel traffic queuing and noise from buses at the Transport Interchange affecting the Design District should be resolved at this stage.

It is important to create a welcoming arrival point near the Transport Interchange and Design District by carefully managing the movement network and parking. The Panel understands the implications of the O₂ Arena’s car parking requirements but suggest the client, design team and local authority could develop a strategy to reduce car parking over time and to design the multi-storey car park in such a way that it is convertible and adaptable for alternative uses, for example in terms of floor-to-floor height and ground floor uses.

**Neighbourhoods**
The proposed Design District at the heart of the peninsula has the potential to become an exciting and thriving destination next to the O₂ Arena, comparable in terms of vibrancy to Leicester Square. The parameters for the block layout and minimum distances between plots appear to be adequately resolved and the north-south route linking the Central Park and Peninsula Square is sound. Further work is required to ensure that service and delivery arrangements will not undermine the quality of the spaces and that the space is busy and animated throughout the year, providing a canopy could help provide a more protected environment.

The residential quarter at the southern tip of the site has limited opportunities for diagonal or direct east-west routes leading to the Transport Interchange and Central Park. The quality of the pedestrian environment to reach this part of the peninsula and in particular towards St. Mary Magdalen.
Church of England School along the Millennium Way between the gasholder and the back to the proposed film studios is likely to be unattractive and needs to be upgraded. It will be interesting to explore breaking up the large block of the film studios to establish opportunities for further glimpses of the Central Park from the east.

City block typology
The residential city block typology is compelling and an innovative response to the site. It has the potential to marry the advantages of perimeter blocks and tall buildings by optimising residential densities and mixed use without compromising the communal amenity space and street character. The variation in the building heights within each city block will result in a complex local micro-climate, in terms of wind and overshadowing. Further testing in terms of sunlight and daylight and clearly separating public and private spaces is required to ensure that the homes in the proposed buildings are successful and that a thriving, sustainable community can develop in this neighbourhood. It is recommended that the local planning authority should assess these cumulatively at each reserved matters application.

The GDRP encourages the design team to develop design guidelines and set up rules that enable the varied character in terms of height of the city blocks. The city block is most likely to be developed as a single development site rather than evolving over time organically with different landowners. It is recommended that the design team should test illustrative examples of how the city block typology works exploring different scenarios in terms of arranging tall and lower elements to identify, to design out any potential ‘worst case’ scenarios.

Landscape Design
The increase in density across the site requires the Masterplan to work hard to create successful open spaces, parks and gardens. The overall landscape strategy is sound but requires further work in evolving the detailed character for each open space. The design has the potential to create character and identity across the site, including the areas along the busy roads which currently still appear rather sterile. The Central Park could be developed further to provide undulation, wooded areas, spaces for different uses and allow ad-hoc activities and intimate spaces.

At this stage of the planning process, decisions should be made on how to procure and deliver the landscape design and how to manage and maintain the open spaces. The GDRP urges the client, design team and local authority to fully embed the landscape design in the masterplan and to put mechanisms in place to ensure that the intended quality will be delivered.
The applicant has submitted a Design and Access Addendum to address these comments. The design is discussed in sections 27-32 of the report.

7.23 Building Control

Comments dated 22 July 2015

Building Regulations applications will be required in due course.

7.24 Housing Strategy and Partnerships

Comments dated 2 April 2015:

Affordable Housing Requirements

The Directorate of Housing Services (DHS) generally requires that a minimum of 35% affordable housing is achieved in all residential developments in the Borough.

The total number of housing units provided as part of this redevelopment is 12,678:

This is an outline planning application and therefore details tenure/mix/ of plot and block numbers are not included as they will be dealt with in reserved matters.

Tenure Mix
Within every scheme DHS requires a mix of tenures, to include both rented and intermediate units, with a preferred split of 70% rented units and 30% intermediate units.

The Planning statement refers to both RBG’s policy as stated in the Core Strategy and the London Plan which refers to a 60/40 split.

This will be considered as part of reserved matters

Unit mix

The 2015 Master plan seeks permission for up to 12,678 residential units in a mix of private, social and intermediate housing within each neighbourhood and the mix within different parts of the site will vary in accordance with neighbourhood characteristics.
The proposed mix of units will include studios/1b/2b and 3b/3b+ within the following ranges:
Studios - up to 10%
1 beds 25 - 50%
2 beds 20 - 40%
3 & 3+ beds 5-30%

In general Housing does not accept studio housing as affordable housing. Within the previous Master plan (2004) it had been agreed that the range of affordable housing to be provided on each plot would be between 20% - 55%, and this is still regarded as a useful benchmark.

Standards
Each scheme will need to comply with the following standards:
- Minimum requirement for Code for Sustainable Homes level 4
- Lifetime Homes – all Housing stock will be delivered to Lifetimes Homes standard
- London Plan space standards – (policy 3.5 of the London Plan) sets out the minimum space standards expected. These have now been incorporated into the Mayor of London Housing SPG (November 2012)
- Designing out crime - Development proposals should meet Secured by Design standards
- Greenwich Wheelchair Site Brief (updated 2012) – The developer states that 10% of housing provision will be adaptable for wheelchair use.


Facilities Management and Service Charges
The Developer and the nominated Registered Provider will be required to minimise service charges for the affordable housing through appropriate integration and detailed design allied with effective management arrangements to be agreed with the Registered Provider.

Public Realm
Given the location of this scheme, DHS strongly recommends that in addition to providing private amenity space, public amenity is of the highest quality in terms of design and materials and should be accessible to all tenures in the development.
Car Parking
DHS expects that parking be allocated to the affordable housing units in proportion to its availability across the whole scheme, with surface parking provided wherever possible to help to limit the level of service charges.

Housing would expect that each wheelchair unit would have an individual car parking space allocated.

Where housing is provided for particular client groups, such as the elderly or disabled clients, access for carers and other health and social services to parking should be given consideration as part of the scheme.

Comments dated 17 August 2015:

Affordable Housing Requirements
The financial viability assessment should be subject to review by the consultants employed on behalf of the Council.

Housing support the proposal to provide for a review mechanism that will allow for the provision of additional affordable housing, should an updated Financial Viability Assessment demonstrate an increased rate of return.

This is an outline planning application and therefore details tenure/mix/ of plot and block numbers are not included as they will be dealt with in reserved matters. These will demonstrate compliance with the Masterplan or justify any departures.

Tenure Mix
Within every scheme DHS requires a mix of tenures, to include both rented and intermediate units, with a preferred split of 70% rented units and 30% intermediate units.

The proposal regarding the affordable housing to be delivered as part of the 2015 masterplan states that the tenure mix will be 70% rented and 30% intermediate.

This mix within each Neighbourhood will be considered as part of reserved matters

Unit mix
The 2015 Master plan seeks permission for up to 12,678 residential units in a mix of private, social and intermediate housing within each neighbourhood
and the mix within different parts of the site will vary in accordance with neighbourhood characteristics.

In response to previous comments further detail has been provided on the Housing mix within each neighbourhood and this has been amended. There is an increase in the provision of studio accommodation from up to 10% to up to 20% and in terms of the 3 bed family units

The revised mix of units will include studios/1b/2b and 3b/3b+ within the following ranges:
Studios - up to 20% (maximum of 15% overall)
1 beds 25 - 50%
2 beds 20 - 40%
3 & 3+ beds 5-30% (minimum of 20% overall)

In general Housing prefers not to accept studio housing as affordable housing, in particular this is not considered appropriate for Affordable Rented Housing.

There is a need for larger family homes including 3 bedroom and 3 bedroom+ accommodation, and Housing would wish to see family housing provided across the scheme, within each Neighbourhood. The mix of units for each Neighbourhood will be considered as part of reserved matters.

Within the previous Master plan (2004) it had been agreed that the range of affordable housing to be provided on each plot would be between 20% - 55%, and this is still regarded as a useful benchmark.

Comments regarding standards are unchanged from the previous response, except regarding the wheelchair units.

**Standards**
Each scheme will need to comply with the following standards:
- Minimum requirement for Code for Sustainable Homes level 4
- Lifetime Homes – all Housing stock will be delivered to Lifetimes Homes standard
- London Plan space standards – (policy 3.5 of the London Plan) sets out the minimum space standards expected. These have now been incorporated into the Mayor of London Housing SPG (November 2012)
- Designing out crime - Development proposals should meet Secured by Design standards
- Greenwich Wheelchair Site Brief (updated 2012) – The developer states that 10% of housing provision will be adaptable for wheelchair use.
Housing would support that the affordable housing rented units are designed to be in compliance with the Greenwich Wheelchair Site Brief. (Updated 2012) However, the Affordable Housing Intermediate units can be “adaptable” for wheelchair use.

Please note that in the documents (design and access standard addendum) the Developer refers to each Masterplan zone will achieve or exceed current wheelchair housing standards as set out in the London plan and Greenwich Wheelchair Site brief, and that a site wide parking strategy will help to ensure that suitable parking bays for residents of wheelchair adaptable units are provided where required to an appropriate standard.

**Facilities Management and Service Charges**
The Developer and the nominated Registered Provider will be required to minimise service charges for the affordable housing through appropriate integration and detailed design allied with effective management arrangements to be agreed with the Registered Provider.

**Public Realm**
Given the location of this scheme, DHS strongly recommends that in addition to providing private amenity space, public amenity is of the highest quality in terms of design and materials and should be accessible to all tenures in the development.

**Car Parking**
DHS expects that parking be allocated to the affordable housing units in proportion to its availability across the whole scheme, with surface parking provided wherever possible to help to limit the level of service charges.

Housing would expect that each wheelchair unit would have an individual car parking space allocated.

Where housing is provided for particular client groups, such as the elderly or disabled clients, access for carers and other health and social services to parking should be given consideration as part of the scheme.

*These comments are dealt with in Sections 11-16 of the report.*

7.25 **Housing Occupational Therapist (HOT)**

*Comments dated 2 April 2015:*
The HOT has reviewed the information relating to accessibility detailed in the Design and Access (D&A) statement and has made the following observations. The first two comments are of particular concern to the HOT.

- Page 144 of the D&A statement states that the residential development will be designed to meet Lifetime Homes criteria, and the Habinteg Wheelchair Housing Design Guide. The HOT would expect all wheelchair accessible accommodation and associated communal resources to be designed to the Greenwich Wheelchair Site Brief (GWSB).
- Page 145 states that 10% of dwellings will be designed to be wheelchair adaptable. The HOT would expect the social rental units to be fitted out as fully accessible from the outset.
- Page 146 states that accessible parking bays will be compliant with dimensions set out in Part M. The HOT would expect that all social rental accessible units should have a dedicated accessible parking bay, of dimensions set out in the GWSB, which exceeds Part M requirements.
- Page 150 states that the 10% adaptable units will be distributed throughout the development, to prevent clustering of accessible apartments, and to ensure wheelchair users have the same choice in locations as anyone else. This is positive and appropriate.
- Page 152 notes that lift access achieving LTH required dimensions will serve all blocks, including basement parking. This is appropriate. It should be noted however that all blocks containing accessible/adaptable units should have access to two lifts.
- Page 152 notes that the proposed hotel should have 10% accessible accommodation. This is appropriate.
- Appropriate reference to, and incorporation of, Part M and BS8300 design recommendations is made in relation to the proposed public spaces, including ramps, seating and features for visually impaired users.

Comments dated 22 July 2015:

The OT has reviewed the additional information that has been submitted by the applicant, and notes the following details which address the comments of 02/04/15.

Page 18 of the Design and Access Statement Addendum notes that all residential accommodation will meet or exceed the design requirements of Lifetime Homes and the Greenwich Wheelchair Site Brief.

Page 11 of the Planning Addendum: Consultation Responses notes that a condition can be imposed regarding the fit out of social rental units as fully
accessible, and also the allocation of accessible parking bays. It also notes the requirement for blocks containing accessible units to have two lifts. The OT’s other previous comments are also noted within Appendix 1 of this document.

As this application is still at outline stage, the OT feels that her concerns have been adequately addressed for now.

Suitable conditions have been included to address these comments.

7.26 Waste Services

Comments dated 17 June 2015

The Council’s Highways officers are not comfortable with refuse vehicles using the Thames Path as a turning head which means that the applicant will need to find another solution to the problem of refuse vehicles reaching the bin stores without reversing.

Comments dated 11 August 2015

Waste Services met with the applicant to discuss problems they have with vehicle tracking for the whole of this site. They have major problems relating to vehicle access which have not been resolved. Waste Services are not satisfied with the proposals for refuse vehicle to reverse down side streets to reach bin stores; waste vehicles should travel in a forward motion to reach all bin storage areas and exit the site. The applicant is looking at a way to rectify the problems that already exist for completed blocks and to ensure that they do not exist for future constructions.

Comments dated 20 August 2015:

We confirm that we are satisfied with the proposed condition, relating to waste storage and vehicle tracking to collection points and bins stores, for future development of the Peninsula site.

The agreed condition has been included in the recommendation.

7.27 Community Safety and Environment - Pollution Control (CSE)

Comments dated 21 April 2015:

Air Quality
Key comments highlighted from the AQ assessment by bullet point. The CSE comments below each bullet point to be addressed within future design stages:

- The results of the Air Quality Neutral Assessment (as part of this Mayoral SPG ‘sustainable design and construction’) has not been complied with regarding Building emission Benchmarks...Where a benchmark is exceeded, on- or off-site mitigation or offsetting is required”.

If a further version or assessment of this standard shows no difference to that given then CSE would expect to see details of comprehensive mitigation applied within the detailed design stage.

- Mitigation against air pollution for new residential premises is stated as “Building floors of the 2015 Masterplan that fall into APEC Levels B and C should be provided with mechanical ventilation fitted with appropriate filters to reduce the NO2 from the incoming air to acceptable levels below the AQS. For details of which floors fall into APEC Levels B and C, see the results, in Appendix 8.10”.

CSE would expect to see mitigation applied within the detailed design stage.

An appropriate condition or control at this stage of planning needs to be applied to any outline permission granted to request the applicant to produce further detailed stages and to show how AQ will be minimised and mitigated such that AQ does not form any objection from this department against the proposal.

Comments dated 22 April 2015:

Should planning permission be granted, the following conditions should be included:

**Contaminated land**

This site has been subjected to use in the past which may have included contaminative activities. Before construction begins the developer shall undertake:

1. A preliminary risk assessment. Should the preliminary risk assessment identify the need for further investigation;
2. A site investigation scheme to provide a detailed assessment of the risk to all receptors, including off site receptors.

3. A remediation proposals based in the results of the site investigation and risk assessment in 2 above giving full details of remediation required. Where contamination is found in areas of land to be used for private gardens, a minimum cap of 1m of clean soil shall be laid.

The preliminary risk assessment, site investigation and remediation proposals shall be agreed with the local planning authority. On completion of the remediation but before the site is first occupied the developer shall

4. Provide a verification report to demonstrate the completion of the works set out in the agreed remediation proposals in 3 above.

Reference shall be had to Environment Agency Guide CLR11 Model procedures for the management of land contamination available at https://www.gov.uk/government/publications/managing-land-contamination

Demolition impacts
Prior to the commencement of any demolition on site a ‘Demolition Method Statement’ shall be submitted to, and approved by, the Local Planning Authority. The Method Statement should include details of the following -

- Haulage routes
- A demolition or refurbishment asbestos survey
- Likely noise levels to be generated from plant
- Details of any noise screening measures
- Proposals for monitoring noise and procedures to be put in place where agreed noise levels are exceeded
- Where works are likely to lead to vibration impacts on surrounding residential properties, proposals for monitoring vibration and procedures to be put in place if agreed vibration levels are exceeded. Note: it is expected that vibration over 1mm/s measured as a peak particle velocity would constitute unreasonable vibration
- Likely dust levels to be generated and any screening measures to be employed
- Proposals for monitoring dust and controlling unacceptable releases such as asbestos
- Wheel washing facilities and facilities for discharging the water

Reference shall be made to:

- The Councils’ Construction Site Noise Code of Practice
  http://www.royalgreenwich.gov.uk/downloads/417/pollution_control_-_construction_information_and_advice
• The Mayor of London’s ‘The control of dust and emissions from construction and demolition’ Best Practice Guidance http://www.london.gov.uk/thelondonplan/guides/bpg/bpg_04.jsp and
• BRE four part Pollution Control Guides ‘Controlling particles and noise pollution from construction sites’.

Construction Method Statement
A construction method statement shall be submitted to and approved in writing by, the Local Planning Authority. The method statement shall include details of the following:-
• Works of demolition and construction shall be carried out during normal working hours, i.e. 08:00 to 18:00 hours Monday to Friday, and 08:00 to 13:00 hours on Saturdays, with no noisy working audible at the site boundary being permitted on Sundays or Bank Holidays.
• Haulage routes
• Likely noise levels to be generated from plant
• Details of any noise screening measures
• Proposals for monitoring noise and procedures to be put in place where agreed noise levels are exceeded
• Where works are likely to lead to vibration impacts on surrounding residential properties, proposals for monitoring vibration and procedures to be put in place if agreed vibration levels are exceeded. Note: it is expected that vibration over 1mm/s measured as a peak particle velocity would constitute unreasonable vibration.
• Likely dust levels to be generated and any screening measures to be employed
• Proposals for monitoring dust and controlling unacceptable releases
• Wheel washing facilities and facilities for discharging the water
Reference shall be made to:
• The Councils’ Construction Site Noise Code of Practice http://www.royalgreenwich.gov.uk/downloads/417/pollution_control_-_construction_information_and_advice
• The Mayor of London’s ‘The control of dust and emissions from construction and demolition’ Best Practice Guidance http://www.london.gov.uk/thelondonplan/guides/bpg/bpg_04.jsp and
• BRE four part Pollution Control Guides ‘Controlling particles and noise pollution from construction sites’.

Odour from Fixed plant & Equipment
Prior to the commencement of works on the development hereby permitted, full details of any mechanical ventilation or other plant associated with the commercial operation of the building shall be submitted to and approved by
the Local Planning Authority. Details should include full specifications of all filtration, deodorising systems, noise output and termination points. Particular consideration should be given to the high level discharge of kitchen extract air/ the discharge of toxic or odoriferous extract air where a high level of discharge is usually essential. The approved scheme shall be completed prior to occupation of the development and shall be permanently maintained thereafter. Reference shall be had to Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems published by DEFRA (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69280/pb10527-kitchen-exhaust-0105.pdf)

Internal extract flue
Where any building in the proposed development has within it an A3 food use, prior to the commencement of works on the development hereby permitted, details of a possible protected internal route for the provision of a flue through the building shall be submitted to and approved by the Local Planning Authority. The approved works are to be completed prior to occupation of the development and shall be permanently maintained thereafter.

Noise from fixed plant & equipment
Prior to the commencement of works on the development hereby permitted, an acoustic report shall be submitted to and approved by the Local Planning Authority. The noise from any plant or equipment such as air handling units, boilers, lifts, mechanical ventilation etc which forms part of the development shall not cause the existing background noise level to increase when measured at one metre from the façade of the nearest noise sensitive premises. In order to achieve this, the plant shall be designed/selected, or the noise from the plant should be attenuated, so that it is 10dB below the existing background level ($L_{A90 \text{15min}}$). The approved scheme shall be implemented prior to occupation of the development and shall be permanently maintained thereafter. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed.

Commercial/residential sound insulation
No development shall take place until a detailed scheme of noise insulation measures for all divisions walls and/or floors separating commercial/residential areas has been submitted to and been approved in writing by the Local Planning Authority. The scheme of noise insulation measures shall be prepared by a suitably qualified consultant/engineer and shall demonstrate that the proposed sound insulation will achieve a level of protection which is at least +5dB above the Approved Document E standard dwelling houses and
flats for airborne sound insulation and -5dB for impact sound insulation. The approved scheme shall be implemented prior to the commencement of the use and be permanently retained thereafter.

**Sound Insulation**
Prior to the commencement of construction on the development hereby permitted, details of the proposed sound insulation scheme to be implemented between the residential accommodation and the roof garden shall be submitted to and approved by the Local Planning Authority. Details should include airborne and impact sound insulation. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed. The approved scheme is to be completed prior to occupation of the development and shall be permanently maintained thereafter.

**Environmental Noise**
Details should include mitigation measures such as siting, orientation, noise barriers and other such measures where appropriate. In assessing noise the Local planning Authority shall have regard to the Planning Policy Practice Guidance on Noise
http://planningguidance.planningportal.gov.uk/blog/guidance/noise/noise-guidance/

Noise mitigation measures shall produce internal noise levels specified in table 4 section 7.7.2 of BS8233 in all residential premises. The mechanical ventilation system shall meet or exceed the specifications set out in clause 6, schedule 1 of the Noise Insulation Regulations 1975 with regard to acoustic performance and airflow rates. Alternative schemes that meet the above noise and ventilation standards can be considered. The approved scheme is to be completed prior to the occupation of the development and shall be permanently maintained thereafter. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed.

**Helipad**
The previous masterplan included provision of a helipad. Whilst I did not notice a helipad in the current application, if there is one there should be a condition along the lines of condition 56 of the 2004 decision notice to application 12/2903/O restricting its use to emergencies only.

**Victoria Deep Water Terminal**
A condition similar to 120 of the 2002 application which required a specific strategy to be agreed should be included.
**Electric Car Charging Points**
Provision of the GLA standard requirements should be secured.

**S106 funding**
A substantial contribution towards Environmental Health is sought.

*Comments dated 6 May 2015:*

**Environmental Noise**
- The applicant’s noise assessment does not provide a full assessment of all of the current and permissible operations under existing consents that could be carried out by the wharf operators;
- The scheme should seek to design out the problems arising from noise impacts rather than introduce mitigation;
- The strategy and design measures required under the retained condition 120 should be submitted and approved prior to the submission of the relevant zonal Masterplans
- The basic design approach would be that no noise sensitive rooms should face the VDWT
- Plots 3.03 and 3.04 which are directly adjacent to VDWT:
  - the road arrangements around these plots opens up more facades to impacts from noise;
  - these plots should have a continuous façade along the southern boundary with no noise sensitive rooms facing VDWT the access route moved north (see attached plot layout);
  - where buildings on these plots face the river they should have inset balconies.

**Plot 2.06**
There are concerns about the proposed primary school on Plot 2.06 being close to the Blackwall Tunnel Portal. Children playing outside could be subject to noise and air quality issues.

**Existing Environmental Method Statement (EMS) and Integrated Management System (IMS) documents**
These documents should be reviewed to confirm that they comply with current standards.

*The requested conditions have been included. Additional suitable conditions and S106 obligations regarding noise and air quality have also been included.*
Children’s Services

Comments dated 10 July 2015:

While it is normal practice to assume a catchment radius of 1 Km/2 Km for planning of potential impact of a development on demand for school places, the methodology has to be moderated to take account of particular circumstances. The 1Km/2 Km radius used by Knight Dragon does not take account of the reality that the area is dissected by the river Thames, covers three boroughs or assess the practical difficulties for parents accessing the schools in the light of the level of daily congestion on the Blackwall Tunnel. The schools in Tower Hamlets and Newham used to secure an overall positive capacity outcome are not easily accessible to be considered as feasible options for parents on the proposed KD development with primary or even secondary age children. The journey time from the Peninsula to Woolmore Primary School in Poplar is over an hour on foot. The school was a 1FE school which expanded to 3 FE to meet local demand and moved to a new building in March this year. Similarly the journey to Eastlea Community Secondary School involves use of the underground or cable car which will be very expensive for parents or a journey (bus/car via the tunnel and A13 - again involving unreasonable school journeys.

It should be noted that a Report on school place planning agreed by Tower Hamlet’s Cabinet in September 2014 predicted that given the capacity available at the time and taking into account the proposed expansion of Woolmore Primary School and other schools, the borough will run out of primary school places by 2016 and secondary school places by 2019.

Once the schools across the Thames are discounted, the net difference between total capacity and current roll for Royal Greenwich primary schools is only 17. These places are in upper KS2 classes at Halstow and Invicta primary Schools which were expanded in 2012 to meet pressure for places in their immediate neighbourhood. These places will be taken up in the next year and both schools are already extremely popular.

In the light of the above, the impact of Knight Dragon’s own child yield figures (early years 1171, primary 1845 and secondary 517) can hardly be described as “minor positive effect on the current capacity”. Our data show that the schools in Royal Greenwich highlighted in the report are already operating at or near full capacity and the impact of 2,362 additional pupils will be significant and negative. The Children’s Services School Roll Projections for 2015 estimate that a further 5 five forms of entry at primary level (1050 places) will be required in School Planning Area 2 which covers the Greenwich
Peninsula and Greenwich West by 2019/20. The pressure is even more acute at secondary level and it is estimated that up to 34 additional forms of entry will be required at borough level by 2019/20.

In addition to the plans for St Mary Magdalene all through school, the land to the north identified in the Master Plan and referred to on page 22 (5.7.33) will therefore be important and required by 2020 for meeting the additional pressure for school places in the early period beyond 2020, rather than at the end of the Master Plan period.

Children’s Services therefore do not agree with the conclusions under 5.7.35 and 5.7.36 [of the ES] and we would argue that significant mitigation will be necessary and required to address the long term permanent and negative effect on school places as a result of the proposed development.

There are no plans to close Holy Family Catholic School and it is not within the 1km radius.

Comments dated 21 August 2015:

In response to the NLP letter of 17 August 2015 regarding the section responding to the previous comments from Children’s Services on “School Capacity”, Children’s Services disagree with the comments and maintain that:

1. The Thames is a significant barrier. The schools identified will require daily bus journeys through the tunnel either by car or by bus journey taking more than 45 minutes due to congestion on the tunnel during rush hours.
2. That Royal Borough of Greenwich has a statutory responsibility to ensure all residents have a school place and cannot rely on the Borough of Tower Hamlet to provide school places for non-residents. This is particularly relevant when a large proportion of the so called surplus capacity is a school in Tower Hamlet expanded specifically to meet the demand from their residents.
3. There is no evidence from all the available data on cross borough mobility of current residents on the Peninsula choosing schools across the river as suggested – even in areas linked by the foot tunnel.
4. The capacity, timing and funding for a “future schools to the north of the site” are largely unknown factors at this stage.

For all these reasons, Children’s Services stands by their previous conclusion that the development will have a significant and negative impact on school capacity unless specific mitigation measures are put in place.
The Thames is a significant barrier:
The Thames is a factor for anyone living and working in London, but is certainly not an insurmountable barrier. The Greenwich Peninsula site benefits from good accessibility by public transport and river crossings.

That the Royal Borough has a statutory responsibility to ensure all residents have a school place:
As confirmed in NLP’s letter dated 18 August 2015, Schools capacity in other boroughs was identified for the purposes of undertaking the ES in conformity with best practice in this field that presents the environmental baseline data available. The applicant has explained that when preparing the ES they are not in a position to assess the effects of how the council will execute its statutory duties. In the event that local school capacity (which includes Boroughs north of the river) were to be discounted from the assessment of the effects on the capacity of education facilities, the outcomes may remain the same if the new school capacity created to the north of the 2015 Masterplan accommodates the child yields of the 2015 Masterplan. In light of the new schools proposed on the site, the increased choice for local residents and the potential for the 2015 Masterplan through the phasing and delivery of the development to completion to be self-sufficient in terms of school places, it is considered that this would be a positive benefit.

There is no evidence on cross borough mobility of current residents on the Peninsula choosing schools across the river as suggested
This is noted.

The capacity, timing and funding for a “future schools to the north of the site” are largely unknown factors at this stage.

Noted and the applicant has confirmed that this situation will be monitored with a potential to develop in line with the demand from schools from the Peninsula children.

In addition to the above it is important to acknowledge that the 2015 Masterplan now seeks to provide two schools on site. In the south is an ‘all through’ school accommodating approximately 1600 children on 1.9 ha of land, which in land take terms is double the area of the 2004 masterplan and also a primary school in the north of the site.

The S106 Agreement will secure the provision of a New Primary School (North) site and a financial contribution toward/or delivery of a Primary School. In addition education will be a recipient of the CIL payments the Council will receive as a result of the development which could be used towards school places.
7.29 Parks, Estates and Open Spaces

Comments dated 30 July 2015:

The development will put pressure on existing park provision and request a S106/CIL financial contribution from the developer towards park improvements at either East Greenwich Pleasaunce, Chevening Road, Greenwich, SE10 or St Alfege Park, Greenwich Church Street, SE10.

The Council will consider appropriate requests for CIL funding from its CIL receipts.

7.30 Culture, Sport and Media (CSM)

Comments dated 6 August 2015:

The following comments have been based on the Playing pitch and Facilities Strategies that were recently adopted by Cabinet to support the core strategy. To develop these two strategies facilities and playing pitch modelling was conducted by Sport England to inform the content of the report. Therefore it is recommended that any developers view and read these documents to inform their approach to sports and leisure provision. The proposal of providing a running track that will help to provide provision for informal exercise has been reviewed but this does not consider the need for more formal sport and physical activity within the plans.

Playing pitches:

1. The playing pitch strategy highlights that the area of Greenwich Peninsula in the North West of the borough is identified as having a high need for playing pitches to meet the demand of a growing population. The recent closure of the Soccercdome has only made this need more acute. CMS has been made aware there is likely to be some artificial pitch provision in the proposed school which will be available for community use, however, this is not likely to be a full size pitch (which would be recommended by Sport England and the FA) which would go some way to satisfying the need. Therefore, ideally it would be desirable to upgrade the size of the pitch planned in the school to meet this need or to provide a full size pitch somewhere on the peninsula. However, if either of these options are not feasible then consideration should be given to how some provision of artificial pitches could be provided to allow for football/mini rugby. CMS would perhaps advise against a hard court Multi-use games area as these are less attractive to football and the
demand is not as significant for other sports and the growth in football in Greenwich in the coming years – both for men and women is likely to be significant. In addition, an artificial grass pitch is likely to be more commercially viable (provided it isn’t too small) and be better maintained by an operator.

Swimming Pools.

2. Following a similar theme to playing pitches, the growth in population has shown that this area of the borough has a higher need for swimming pool space. Therefore it is recommended that a 6 lane 25m community pool should look to be provided in the peninsula area of Royal Greenwich. Sport England guidance suggests that the minimum lane width should be 2m this would mean providing a swimming pool of 25m x 12m (further guidance is available here https://www.sportengland.org/media/187186/swimming-pools-2013-appendix-1.pdf). However, due to the future demographics of the area, this does not mean that Royal Greenwich is advocating building a new public leisure centre on the peninsula but rather a pragmatic approach should be taken that considers various options to achieve this provision. This could include:
   a. Private membership gym and pool provided by a leisure provider or hotel
   b. Extension or enhancement of swimming provision in a residential block that could allow public access via a direct debit membership

Provision of a publicly accessible artificial sports pitch and publicly accessible swimming pool will be secured via the S106 Agreement.

7.31 Flood Risk Manager

Comments dated 14 August 2015:

Central Park – when it is used for storage what would be the typical discharge time (24hr, 48hr) will the storage have treatment elements in it?

The same comments as above for Central Park apply to the park to the West of Tunnel Avenue.

Information on the responses to the EA comments around the non-return valves and capacities are required.
Exceedance routes – Information is required on where these are likely to be and how it will be ensured that they don’t interfere with escape routes.

Ideally, the parks and landscaped areas should be linked for surface water management with Central Park being the last stage before the pumps at Boord Street are needed. This would reduce the volumes to be dealt with by Boord Street as there would be more opportunity for evaporation and natural water use for flora and fauna. The Flood Risk Manager would also like to see the roads linked to the green spaces for managing that run off again to reduce reliance on the pumps and the piped network. The reliance on Boord Street as the first opportunity to discharge surface water to the Thames is perverse, surface water should be managed within the Masterplan area and Boord Street should be the last opportunity to dispose of the surface water.

More information is required on the sort of maintenance regime that is expected/envisaged for the master plan area i.e. will it be a variety of different maintenance companies and the Council?

*Suitable conditions have been included in the recommendation to address these comments.*

**Amenity Groups**

*The comments raised by the Amenity Societies have been addressed in sections 10 to 48 below in the report.*

7.32 Greenwich Conservation Group (GCG)

*Comments dated 29 April 2015:*

As you will appreciate from responses made by the Group to various Greenwich Peninsula planning applications in recent years, submitted initially by Quintain and more recently by Knight Dragon, GCG welcomes the fact that, at long last, proposals have come forward which review the 2004 Terry Farrell approved Masterplan to reflect changes in planning policy at the national level (NPPF), the London-wide level (The London Plan and its successor documents) and the local level (RBG Core Strategy 2014 and its supporting documents) as well as the changed circumstances relating to land uses on the Greenwich Peninsula and the immediately surrounding areas.

That having been said, GCG are greatly concerned that the responsibility for the preparation of a replacement Masterplan has been given to the developer, Knight Dragon, as opposed to adopting the more independent route of the
Council commissioning consultants to undertake a review of the Masterplan on lines similar to those adopted for the preparation of the Spray Street Masterplan SPD and the Thomas Street Masterplan SPD for development on these two areas of the adopted 2012 Woolwich Town Centre SPD.

It seems to us that the developer-led approach being adopted on one of the most important regeneration sites in the borough, the Greenwich Peninsula, puts the Council at a disadvantage in bringing to bear the necessary dispassionate appraisal of what is currently being proposed.

GCG are also concerned that the Council is being asked to approve the Parameter Plans, Development Specification and Design Guidelines covering issues such as land use, maximum quantum, maximum building heights, access and circulation routes and areas of public realm, while issues such as detailed design, external appearance and means of access are to be matters reserved for future consideration. GCG further note that separate zonal masterplans will also come forward at a later date. However, it seems that the material presented in this submission will, if approved, irrevocably determine the scale and type of development on the Greenwich Peninsula - and its appearance - to such a degree that the Council will find it difficult to question in any reserved matters applications coming forward at a later date.

Comments on the Parameter Plans

Land Use - no objection is raised to the changes of land uses being proposed to those in the 2004 approved Masterplan other than to note that, by considerably reducing the amount of office space in favour of other uses in the Peninsula Central neighbourhood and the Design District, it could be considered that the resulting North Greenwich District Centre is overly-skewed towards the entertainment offer at the O2, the recently-approved specialist retail offer within the O2 and other leisure uses - making this area very atypical of the Council’s Core Strategy understanding of what constitutes the usual district centre.

GCG fully accept that additional space will be required for the enhanced transport facilities at the North Greenwich transport interchange, especially the provision of a dedicated non-residential car parking area for AEG users (2,000 spaces), but regret that this involves the demolition of the Foster & Partners award winning terminal building.

GCG also question whether the proposal to introduce a further 500-room hotel can be justified given the approval to the 452-bed hotel currently in construction alongside the O2.
It is noted that a Primary School is proposed in the Meridian Quays
neighbourhood close to the Peninsula Central neighbourhood but question
whether this high profile publicly-trafficked location is best suited for
educational purposes.

GCG raise no objection to the proposed through school in the Lower
Brickfields neighbourhood but it is noted that the current pre-application
consultation material recently submitted by the St Mary Magdelene Church of
England School - as an extension to its present Woolwich-based facility - sets
the school buildings in an entirely different orientation to those in the
Greenwich Peninsula 2015 Masterplan.

It is noted that the application seeks additional uses aimed at supporting the
existing educational offer at Ravensbourne College and the Council’s nearby
Digital Services facilities through the introduction of a film and media studios
facility located in the south of the Peninsula Central neighbourhood. GCG
raise no objection in this respect but are surprised to note that no further
student housing is being proposed additional to that provided on Plot MO120
in the Peninsula Riverside area (Phase 1).

Maximum Quantum - GCG object to the numbers of residential units, both
new homes and serviced apartments, for which approval is being sought. The
application description refers to up to 12,878 residential dwellings and up to
220 serviced apartments making a total of 13,098 units - representing a 30%
increase on the 10,010 figure in the 2004 Masterplan. This in itself would
represent an excessive increase but to this figure should be added a further
figure of 2,822 units which represents the number of units which have either
been already constructed, are in the course of construction or where
consented developments have yet to commence - primarily on the eastern
side of the Peninsula. The resulting combined total of 15,720 units represents
a 57% increase on the 10,010 figure in the 2004 Masterplan. Such an increase
should be resisted by the Council mainly on the grounds that the increases of
this order will not only lead to excessively high development but they will also
put a strain on the amount of publicly-accessible open space where expansion
is limited by the specifics of the site’s location.

Para. 6.5 of the applicant’s Planning Statement states that up to 15,700 units
[for which read 15,720 units according to the numbers stated in the
application description] could be delivered in total on the Peninsula as a whole.

The inference here is that the applicant considers this to be acceptable but
what has not been taken into account is the fact that, on the Peninsula as a
whole and particularly across the wider Greenwich Peninsula Opportunity Area, developments on other sites, such as the completion phases of the Greenwich Millennium Village (1,746 units) and the former industrial-use sites at Lovells Wharf, Enderby Wharf and the Alcatel/Telegraph Works site (2,093 units) need to be added into the mix. This total of 19,559 units is far in excess of the 13,500 figure for the Greenwich Peninsula Opportunity Area envisaged in the Mayor’s Further Alterations to the London Plan (January 2015/ March 2015) and it is also in excess of the Council’s 2014 Core Strategy figure of around 14,000 new homes on the Greenwich Peninsula.

In the Group’s view it would be negligent of the Council to allow one developer to corner the market to such an extent so early in the 10 year period of the London Plan FALP which is why we recommend that the number of dwellings in the current application be considerably reduced.

While considering the quantum of development it is necessary to comment also on three related aspects pertaining to housing provision - density, affordable housing and housing mix.

**Density** - GCG disagrees with the applicant’s assertion that the proposed densities can be supported because of the aspirations of the 2015 Masterplan, the densities already approved elsewhere on the Peninsula and on the fact that the application site falls in an Opportunity Area.

The 2004 Masterplan was approved on the basis that densities would range between a minimum of 200 units per hectare (u/ha) to a maximum of 350 u/ha depending on location. By comparison, the current application seeks densities ranging between a minimum of 157 u/ha to a maximum of 436 u/ha, again depending on location.

GCG note that the densities are deemed to satisfy the London Plan density matrix which, for a site with a “Central” setting could, depending on the number of habitable rooms per unit, support densities ranging between a minimum of 140 u/ha to a maximum of 405 u/ha where the PTAL rating is in the range of 4 to 6.

The documentation admits that, away from the Peninsula Central neighbourhood, with its high PTAL rating of between 5 to 6a, in the southern parts of the application site the PTAL rating varies between 1b to 3 which means that densities here cannot by any stretch of the imagination be deemed to have a “Central” setting. Rather the setting is “Urban” in nature where the density range should not exceed between a minimum of 120 u/ha and a maximum of 170 u/ha.
It is the GCG view that densities should be reduced particularly in the Meridian Quays neighbourhood where the proposed density of 436 u/ha exceeds the London Plan upper limit of 405 u/ha.

GCG note that Table 6.2 (Planning Statement) suggests there are to be “up to” 1,460 residential units in the Peninsula Central neighbourhood. GCG question how can this be given that - elsewhere in the documentation (Design and Access Statement - Proposed Ground Floor Uses Plan) and Table 4.5 (Planning Statement) - no such residential uses are indicated?

Affordable Housing - The 2004 Masterplan was approved on the basis that, overall, 38% of the residential provision would be for the affordable sector. During the ensuing period we have seen that percentage provision fluctuate not least through the questionable decision by the Council in 2013 to allow the developer to provide no affordable housing in 11 plots on the western side of the Peninsula in an area known at the time as Peninsula Quays. In subsequent approvals on the eastern side of the Peninsula an aggregate 40% provision has been achieved. While this is commendable the figure is significantly lower than the 47% necessary if the 2004 Masterplan requirement of 38% for 10,010 units is to be maintained. Moreover, it should be noted that in the most recently approved residential development for Plots NO205, NO206 and NO207 only 24% of the units are for the affordable sector. GCG object strongly to the applicant’s vague statement that “Knight Dragon commits to deliver affordable housing tenure in each district of the development in a manner consistent with planning policies and so as to make the overall development economically viable”.

GCG urge the Council to impose on the developer a definite affordable housing percentage on lines similar to - although not necessarily the same - as those established in the 2004 Masterplan. In that way, the Council will have more control of the situation and will be less at the mercy of the developer or any successor developers where, depending on market trends prevailing at the time, detailed proposals for plot developments could come forward with reduced levels of affordable housing provision or, perhaps, no such provision at all.

Such a situation would be untenable and would fly in the face of Council policy where one of its strategic objectives is the creation of sustainable and cohesive communities.

Housing mix - GCG note that para.6.54 (Planning Statement) sets out an indicative range of unit types with up to 10% as studio units, between 25-50% as 1 bed units, between 20-40% as 2 bed units and between 5-30% as 3 and
3+ bed units. In para. 6.55 (Planning Statement) the documentation states that there will be a “likely average of 20% family (three bed plus) dwellings”. GCG consider that the Council should seek a much firmer commitment from the developer on the delivery of all unit types with accommodation suitable for families taking priority over that suitable for single person occupancy.

Neighbourhoods such as Upper Brickfields, Lower Riverside and Lower Brickfields - all of which relate to the Central Park - are locations ideally suited for families and GCG would urge the Council to insist on a greater average provision than that being offered by the developer. Experience of family housing ratios in developments permitted on the eastern side of the Peninsula shows that units capable of accommodating families have failed to achieve the target recommended in Council policy that 51.2% of the units should be of 3 and 4 bedrooms.

Maximum Building Heights - GCG fully accept that, in the period since the 2004 Masterplan was approved, the intention that the height of development would, on average, range between 10 and 15 storeys has been overtaken by approvals to development on the eastern side of the Peninsula. GCG also believe that close to the Peninsula Central neighbourhood and in parts of the Meridian Quays neighbourhood there is a justification for some high buildings. However, the proposal to build to heights of 30 storeys plus in the vicinity of the Central Park is unsupportable especially in the Lower Brickfields neighbourhood where much of the family housing provision is likely to be accommodated.

It is considered that development heights in areas immediately adjacent to the Central Park should reflect the heights of buildings in a similar relationship to the park already constructed or in the course of construction in the Peninsula Riverside area (Phase 1).

GCG also consider that the height development on the strip of land adjacent to West Parkside and to the east of the through school provision in the Lower Brickfields neighbourhood should be kept to an absolute minimum so not to overwhelm this educational provision.

Public Realm and Open Space - GCG are far from convinced by the applicant’s view at Para 6.126 (Planning Statement) that “the 2015 Masterplan would provide significantly more public open space than was envisaged in this part of the Peninsula under the 2004 Masterplan”. The 2004 Masterplan deemed that a total of 48 acres of public open space would be required to adequately satisfy the needs of those living in the 10,010 units in the area to the south of the O2. By the same token it would appear that to satisfy the needs of those living in the 15,720 units now proposed at least of 75 acres of public open space would be required on a prorate basis. Other than noting the fact that
the Central Park is to be increased in size and that a new park is proposed in
the Meridian Quays neighbourhood, GCG can find no figures, either in acres
or hectares, to judge to what extent the public open space provision will be
more significant.

The applicant must produce a statement and supporting drawing to support
this claim and this should relate to the Peninsula as a whole, including the
public open spaces already consented in developments on the eastern side of
the Peninsula as well as those proposed in the current Masterplan - in other
words, in the area known as Southern Lands in the 02/2903/O application
description.

Conclusion - GCG believe any recommendation on this application should be
defered until the applicant has submitted further detailed information which
is necessary for ensuring that the Council (and members of its Planning Board)
is better placed to dispassionately reach a decision on this proposal which
GCG see as being one of the most important development opportunities
coming forward for many years - the implications of which will be felt for
generations to come.

The number of units should be drastically reduced in order to allay the
Group’s concerns about density and building heights.

An increase in numbers on the lines proposed by the applicant will mean that
the Greenwich Peninsula Opportunity Area will be contributing in the order
of 19,500 units - some 6,000 units more than required by the London Plan
and representing close to 66% of the 30,000 new homes deemed necessary,
borough-wide, over the period 2015-2025 by the Mayor of London.
There also needs to be much more certainty on the affordable housing offer,
on the housing mix in terms of accommodation for families and on the public
realm and open space provision.

For all these reasons GCG believe that the Council is not, at the present time,
in a position to rule on this application. GCG further believe that, by allowing
the developer to produce this revision to the 2004 Masterplan, the Council, in
not having ownership of the project, will be in a weaker position when, in due
course, detailed reserved matters applications come forward for
consideration.

Finally, GCG believe it is necessary to establish how this application will affect
the standing of the regrettable decision taken by the Council in 2013 in
respect of the 11 plot development in the former Peninsula Quays area. It
could be inferred from the applicant’s statement that he “commits to deliver
affordable housing tenure in each district ……” that the Deed of Variation is capable of being waived. Can this really be the case?

Comments dated 10 August 2015:

GCG are pleased to note that some of the additional material responds to criticisms made by ourselves and other amenity groups, as well as to concerns raised by statutory consultees such as the GLA and others. Despite this, they remain of the view that the revised submission, like its original counterpart, continues to contain questionable facts and figures to which we must continue to object.

Site boundaries – The group appreciate that the applicant has submitted supporting documentation covering the land in his ownership (the red line boundary) yet there are many instances where he brings into play reference to provision of facilities in other areas on the Greenwich Peninsula outside his control which make comparisons between what was approved in the 2004 Masterplan and what is proposed in the 2015 Masterplan difficult to reconcile. These discrepancies could have been resolved if only the Council had taken ownership of the preparation of the revised Masterplan. As things stand, the developer is subjectively dictating matters to his benefit whereas, had the Council commissioned a new Masterplan, a much more objective approach would have been guaranteed with the advantages of a dispassionate appraisal of the supporting material.

Quantum of development – The new documentation states that overall on the Peninsula a total of 15,700 residential units are being proposed. The group continue to maintain that this figure should read 15,720 units - made up of 12,678 residential units and 220 serviced apartments within the red line boundary and a further 2,822 on sites delivered or soon to be delivered through approvals to the 2004 Masterplan application and/or subsequent reserved matters applications.

GCG also continue to maintain that the resultant 57% increase on the 10,010 figure in the approved 2004 Masterplan is excessive for the reasons they originally stated - height of development particularly on the western side of the Peninsula much greater than that on the eastern side and a strain on the amount of publicly-accessible open space where expansion is limited by the specifics of a site surrounded on three sides by water.

In their letter of 29 April 2015 GCG pointed out that other developments in the wider Greenwich Peninsula Opportunity Area (at Greenwich Millennium
Village, Enderby Wharf, Telegraph Works and Lovells Wharf) could account for a further 3,839 new homes on top of the 10,010 new homes in the 2004 Masterplan. Add to that the additional 5,710 new homes in the 2015 Masterplan (and the recently proposed 404 new homes envisaged by AEG on its plot immediately south of the O2) and the wider area has the potential for accommodating 19,963 new homes - broadly 6,000 in excess of the borough’s expectations for the site in the Council’s Core Strategy and some 6,500 in excess of the Mayor’s expectations for this part of the borough in the GLA documents on the London Plan Opportunity Areas.

GCG believe that the applicant’s intensification of development on that part of the Greenwich Peninsula under his control should be severely curtailed by the Council so that one of its 5 Opportunity Areas is not being overdeveloped at the expense of the others - Charlton Riverside/Deptford Creek and Greenwich Riverside/Thamesmead and Abbey Wood/Woolwich - which are considered, by the Mayor, to be capable of contributing some 16,500 new homes towards the borough-wide target of 30,000 new homes.

Density – GCG note that, in order to make the density figures more palatable, the applicant is including, for density calculation purposes, large areas of open space such as the Central Park and other open spaces. The group dispute this approach which, in their understanding it is contrary to the method adopted in reserved matters applications for development plots on the eastern side of the Greenwich Peninsula.

The new documentation states that densities will differ between neighbourhood zones quoting a maximum figure of 425 u/ha in the Meridian Quays zone and a minimum figure of 164 u/ha in the Brickfields South zone. These figures increase, respectively, to 507 u/ha and 218 u/ha if the open space outside the zone is discounted.

For the Meridian Quays zone, which enjoys a high PTAL rating and could be said to be “Central” in its setting, the Mayor’s guidance is that, depending on the type of dwelling (hr/unit) in any proposed development, densities could range from 290 u/ha to 405 u/ha maximum. For the Brickfields South zone, which has a relatively poor PTAL rating and could be said to be “Urban” in its setting, the Mayor’s guidance is that densities could range from 120 u/ha to 170 u/ha maximum.

It is clear that, at 507 u/ha, the density for the Meridian Quays zone exceeds the maximum guidance and, at 218 u/ha, the density for the Brickfields South zone also exceeds the maximum guidance.
Affordable Housing – GCG note that the applicant is prepared to provide 22.5% of the additional units as the affordable housing provision across the board, with this figure rising to 25% if the provision on sites delivered or about to be delivered through the 2004 Masterplan is included.

The applicant even goes so far as to indicate that, subject to numerous caveats including a decision on the application being reached at the September 2015 Planning Board, he would be in a position to offer a 35% provision of affordable housing. This could be said to be compliant with Core Strategy policy in that at least 35% of the residential units will be provided for this sector of the market but GCG regret that the proportion is below the 38% ratio on which approval to the 2004 Masterplan was based.

Housing mix – GCG note that residential accommodation is being provided in the form of studio units, 1-bed flats, 2-bed flats and 3-bed flats (or houses) in varying degrees within each of the neighbourhood zones. The range for the units capable of accommodating families is between 5% and 30% with a stated minimum of 20%. The applicant must be encouraged to make a much more significant contribution in this respect in order to go some way towards satisfying the borough-wide housing need requirement of 51.2% identified at Table 8 of the Core Strategy.

Public Realm and open space – In their letter of 29 April 2015 they stated that the amount of open space in the 2015 Masterplan should be proportionate to that in the 2004 Masterplan where some 19 hectares of open space was deemed necessary to adequately satisfy the needs of the occupants of the 10,010 new homes then being proposed.

On a pro-rata basis, they consider that, for the 15,720 new homes proposed for the Masterplan area, some 30 hectares of open space will be required. However, the newly-submitted material states that only 24 hectares of open space is being provided. GCG continue to maintain that this is an inadequate provision and they do not accept the applicant’s view that additional open space will be provided through the inclusion of private gardens where houses are being provided or through the low level courtyards and higher level roof terraces in the apartment blocks. All these examples of open space are not publicly accessible and therefore should be discounted.

The group also bring to the Council’s attention an anomaly in the submitted material whereby the applicant sets out the open space provision in various parts of the Greenwich Peninsula as a whole which, in total, amounts to barely
14.18 hectares - in sharp contrast to the 24 hectares quoted elsewhere in the documentation.

Financial Viability Report – GCG are pleased to note the applicant has commissioned a financial viability report in support of the application but regret that only an abridged version has been made available for public consumption. The group trust that, well in advance of any Planning Board meeting called to determine this application, the full report will be made available to members along with the Council’s independent assessment of the full report so that the regrettable situation in which members were recently placed when determining the application for the Enderby Wharf Cruise Liner Terminal is avoided.

Conclusion – Despite the provision of the further information, GCG continue to object to the application for the reasons stated in their original letter dated 29 April 2015 believing the intensification of development to be excessive and, in turn, leading to significant concerns on:-

(i) density particularly in those parts of the site which have a poor PTAL rating,
(ii) buildings which, through their height, bulk and massing, raise questions about acceptable living conditions,
(iii) poor levels of affordable housing provision,
(iv) inadequate provision of housing capable of accommodating families, and
(v) insufficient amounts of publicly accessible open space.

7.32 Greenwich Society (GS)

Comments dated 27th April 2015:

Whilst the GS commends many design aspects proposed, they must submit a strong objection to this application – this primarily on the following grounds:

i) An excessive increase in the number of dwellings proposed for the Peninsula area from 10,010 granted consent under the previous 2004 Masterplan to 15,720 dwellings proposed now, an increase of 57%;
ii) No assurance given as to provision of affordable dwellings, and little information regarding provision of family dwellings;
iii) The increase in density proposed leading to proposed very tall buildings of proportions which would radically change the riverscape and the landscape in Greenwich and more widely, and overstrain transport infrastructure.
The application documents refer to a 2015 Greenwich Peninsula Masterplan as part of and governing the application. The Council has adopted a highly unorthodox approach in allowing a developer to present a "merged" Masterplan and planning application. The usual method of appointing independent professionals to prepare a Masterplan for wide consultation, the method the Council has adopted for Woolwich, would have allowed for a proper public debate, which has not been possible in this case where consultation has been inadequate.

Also the application is framed in such loose terms in critical areas that it provides no assurance that key aims of the Council in social and affordable housing and in the creation of sustainable communities will be achieved.

The Society therefore urges that consideration of this application for development by Council members be deferred until such time as the parameters of the Masterplan have been separately and independently assessed in the light of the London Plan the Council's own 2014 Core Strategy, the 2004 Greenwich Peninsula Masterplan and other considerations.

The Society’s objections are set out in detail below.

**Greenwich Peninsula Masterplan** – The boundary of the Masterplan is given as that of the planning application for development, rather than the boundary of the original approved 2004 Greenwich Peninsula Masterplan. It is considered that the boundary of the new Masterplan to replace the old should be the same in all respects and the parameters and figures given is adjusted accordingly.

**Numbers of Units: increased by 57%** - The number of new dwellings proposed in this application together with other residential developments in the 2004 Masterplan area already constructed or in the pipe-line total, 15,720 – 5,710 over and above the 2004 Masterplan figure of 10,010 (57%).

The applicant correctly states in para. 6.2 of the Planning Statement that, Greenwich Peninsula is identified in the London Plan as an Opportunity Area "capable of delivering a minimum of 13,500 homes". However the applicant has failed to appreciate that the London Plan (map 2.4) defines the Greenwich Peninsula Opportunity Area as stretching from Park Row in the west, to the boundary with the Charlton Riverside Opportunity Area in the east and bounded by Trafalgar Road and Woolwich Road to the south. Thus, the Opportunity Area includes, besides the 15,720 new dwellings within the (2004) Greenwich Peninsular Masterplan area, the developments at
Lovells (667 units), Greenwich Millennium Village (1,746), Alcatel / Enderby (say 1,426) which, along with smaller developments such as the Peltons, would mean a total of well over 19,800 units, a figure far in excess of the London Plan 2015 figure of 13,500 and the figure of 14,000 adopted in the RBG Core Strategy 2014. What is being looked for here in terms of numbers is inconsistent with the London Plan and with the Core Strategy.

**Density** – RBG Core Strategy states that the Council will “utilise the London Plan Policy 3.4 to guide rates for housing density...”. The maximum London Plan density guideline, that for Central areas defined as “…located within 800 metres walking distance of an international, Metropolitan or Major town centre”, is 405 units per hectare – the density proposed for the Meridian Quays area is 436 u/ha, vastly in excess of this.

Whilst they accept the need to accept higher densities than were approved at the time of the 2004 Masterplan, the Society consider that the claim for “Central area” status is questionable and that there are no "exceptional circumstances" here as defined by the Housing SPG which justify exceeding the London Plan densities to the extent proposed.

This high density, and great increase in units, will inevitably reduce amenity for residents on the Peninsula itself and across a wider area where residents will see their public transport and road network put under increased pressure. Densities here cannot be seen in isolation from the impact of other residential and retail developments nearby. The Peninsula is not an island.

**Tall Buildings: up to 40-storey’s** – High densities inevitably lead to demand for tall buildings. The move from the 2004 Masterplan range of ten to fifteen storeys is understandable in the light of recent consents for taller buildings, which have rendered the earlier plan obsolete. But there is no adequate justification for heights of up to 30 and 40 storeys across a wide area of the Peninsula, especially where they flank Central Park.

It is noteworthy that the applicant makes a virtue of “stepping down the height of buildings” for Meridian Quay Park where the highest value units are likely to be located, in order “to reduce the impact on the park”, but takes the opposite view to the south and beside Central Park where more family units will be located. GS consider that the same principle of stepping down the height of buildings to Central Park to “reduce the impact on the park” should be adopted there.

Whilst a small number of very tall buildings strategically sited around the 02 might have met the CABE and English Heritage guidance quoted in the Planning Statement, GS do not accept that a case has been made for so many
very tall buildings across the whole site. Tall buildings on either side of the Pilot Public House and adjacent Statutory Listed cottages, Nos 70 to 82 River Way, will inevitably dwarf these heritage assets.

Affordable Dwellings - The planning application gives no indication at all as to the percentage of affordable housing to be provided – merely saying, ”Knight Dragon commits to deliver affordable housing tenure in each district of the development in a manner consistent with planning policies and so as to make the overall development economically viable.” The application as it stands could lead to the applicant, or another developer who acquired a site, building very few affordable units, or none at all.

The Council’s Core Strategy states that such development as proposed, “will be required to provide at least 35% affordable housing” or 38% to properly reflect the percentage commitment established in the 2004 Masterplan. GS applaud the fact that completed and consented schemes on the Peninsula provide 40% affordable units, in line with the Council's policy aim. This application, however, gives no assurance that this level of provision will be maintained. Recent developments have been providing very much smaller percentages of affordable housing, on the grounds of “viability assessment” claims. Should this continue on the scale here, it would stand to make nonsense of Council policy in this respect and its strategic objective to foster sustainable and cohesive communities.

In 2014, and in exceptional circumstances, RBG gave consent for Peninsula Quays to be developed without any affordable housing. The standing of that consent, and any subsequent S106 agreements, is unclear, and needs to be clarified in the light of the applicant's statement that all areas of the scheme will contain affordable housing. The "missing" element was to be provided elsewhere on the Peninsula, and the application fails to establish that it will be provided and where.

Housing for Families - It is highly regrettable that only “a likely average of 20%” is stated as proposed for family dwellings in this development. This is far below the Council’s Core Strategy requirement for 51.2% of 3 and 4-bedroom + accommodation to be provided.

Page 44 of the Planning Statement proposes a mix of types as follows:

- Studios up to 10%
- 1 beds, 25-30%
- 2 beds, 20-40%
- 3 & 3+ beds, 5-30%
Such wide parameters, and such a low percentage of family units, are inadequate to ensure that the residential zones support balanced and sustainable communities.

Public Open Space – The Planning Statement indicates that “the 2015 Masterplan would deliver a scheme which would provide significantly more public open space than was envisaged in this part of the Peninsula under the 2004 Masterplan” but no figures are provided to justify this claim.

While accepting that the 2015 Masterplan includes a widening of the Central Park and the provision of a new Park at Meridian Quays with an extension east via a green bridge to the expanded transport interchange to link into Peninsula Square, as well as improvements to the riverside walkway, the creation of a new riverfront plaza, enhancement of the current open space at the Emirates Air Line Park and reactivating Ordnance Jetty at the river end of the Western Boulevard, GS are far from convinced that the provision in total will be adequate to satisfy the needs of the occupants of the 15,500 new homes and 220 serviced apartments now being proposed.

The 2004 Masterplan (application 02/2903/O) was approved on the basis that 48 acres of public open space would be required to adequately satisfy the needs of the occupants of the 10,010 residential dwellings, student and special needs housing on the Greenwich Peninsula. The Society calculate that an additional 27 acres of public open space will be required to proportionately satisfy the needs of the occupants of the 15,720 new homes and serviced apartments currently proposed.

The applicant must demonstrate that this will be the case.

Road Network – The local road network lacks capacity and resilience and the Traffic Assessment predicts increases in traffic on the A206 corridor of 5% in the morning peak and 9% in the evening. The increase from 10,010 to 15,720 dwellings obviously contributes to that extra load more widely, and overstrain transport infrastructure.

This application cannot be considered in isolation from the many other residential and commercial developments in the area, all of which will add vehicle movements to inadequate local roads and junctions where no improvement plans are scheduled. The impacts of the Silvertown Tunnel project on local roads are yet to quantified and it is not known what mitigation measures TfL may or may not propose.
Concerns are growing in the community over air pollution from increased and slow moving traffic and any moves to add further traffic pressures, which this scheme would, should be resisted.

Public Transport – A source of major concern is the Peninsula’s and surrounding transport infrastructure. In terms of public transport, the situation is bleak. The Jubilee Line has, with its existing signalling, capacity for a maximum of 24 trains an hour in the peak. It is already overloaded in the peak hours and at times of major events at the O2. It also acts as an alternative to the Southeastern service during disruptions and engineering work. The advent of Crossrail services to Canary Wharf will do little to mitigate demand from south of the river as its next stop is Woolwich.

The bus capacity is also heavily constrained by the road network. The plan includes the rebuilding and relocation of North Greenwich Bus station, which already provides services for 8 routes. Some of these routes are for long distance travel which means they are subject to adverse traffic conditions in terms of service reliability. Any relocation of the bus terminal needs to ensure that there is still easy access to the Underground and the retail spaces.

The Emirates Air Line is poorly used and as a cable car is a tourist feature rather than a commuter service. Equally the river buses Thames Clipper service with service frequency of 20 to 30 minutes and on board capacity for 250 people is also hardly a viable mass transit system.

Overall the core and essential issue for the Peninsula needs to address its physical constraints, being surrounded by the river on 3 fronts. These impacts directly on the delivery of transport service in and out of the Peninsula and their relationships to other equally dense housing developments adjacent to the Peninsula. Until these are addressed by the Masterplan, particularly at peak times in the morning and evening the densities proposed are not viable.

Conclusion – The Society really think that submission of a planning application for development with a proposed Masterplan geared to cater for that particular development is wrong. The implications spread far wider than the boundary of the application site. Rather, they consider that the Masterplan setting a framework and parameters for the social, environmental and economic development of the area should be considered first – with this taking into account all the other developments in the wider East Greenwich area, so that an assessment of development proposals can be tested and considered in the best interests of East Greenwich as a whole, before an application for actual development is considered.
Comments dated 10th August 2015:

Joint response by Greenwich Society (GS), Westcombe Society (WS) and East Greenwich Residents Association (EGRA) to additional documents dated 15th July 2015

Quantum of development – No justification is produced for the excessive increase in units to 15,720.

The applicant states, correctly, that the Mayor's plan calls for a minimum of 13,500 new units but ignores the fact that this target refers to the Greenwich Peninsula Opportunity Area which comprises not just the Masterplan zone but the entire area north of Trafalgar Road from Park Row in the west to the boundary of the Charlton OA in the east.

Similarly the RBG Core Strategy seeks 14,000 new units in the Peninsula defined as including Greenwich Millennium Village and the Enderby Wharf area.

15,720 units added to GMV(1746), Lovells(667), Alcatel/Enderby(1350) would provide a total of 19,483 units to which should be added the proposed 404 dwellings at Plot NO201 by the O2. Smaller schemes within the Opportunity Area such as the Peltons and the 200 serviced apartments at the hotel would bring the total number of dwelling to over 20,000, a massive overdevelopment far exceeding the targets set by the Mayor and RBG.

Density - Their objections regarding the density proposed remain unchanged. The use of the PTAL Density matrix table has been unwarrantably stretched to include all zones within the Central Area category (i.e. within 800 metres walking distance of an international, Metropolitan or Major town centre). The Urban category should apply to most, if not all, of the area and would suggest maximum density of 260 u/ha not the 345 u/ha proposed.

Furthermore the applicant has included all public open space in the density calculations which we consider quite wrong. Central Park was provided as an amenity for the general public, visitors to the entertainment zone and local workers and should not be used for density calculations purposes.

The effect of the applicant's approach is to support claims of "reasonable" densities in all zones, e.g. for Meridian Quays a density of 427u/ha whereas with public open space excluded the figure is 509 u/ha which vastly exceeds the GLA matrix maximum of 405 u/ha; and for Brickfields North a density of 144 u/ha whereas with public open space excluded the figure is 300 u/ha, which again greatly exceeds the GLA matrix maximum of 170 u/ha. The
groups consider that the major areas of public open space should not be included in the density calculation figures.

**Tall buildings** - Excessive density leads to the demand for excessively tall buildings. The groups concerns that tall buildings fronting the Central Park will reduce its amenity value and that tall buildings close to the Pilot P.H and Grade II Listed terrace, Nos. 70 to 84 River Way, would dwarf these heritage assets have not been addressed and therefore their objections still stand.

**Financial viability report** - The BNP/Paribas report does no more than claim that a wholly private development would make an inadequate profit. Such a scheme is not proposed nor would it be approved. No attempt is made to model a realistic scheme including affordable housing nor any sensitivity testing based on cost and selling price variables. Sensitivity testing is essential for a scheme with 20 year build period and they would expect RBG's independent assessor to require a more thorough approach.

**Affordable housing** – The Groups consider the applicant's approach to affordable housing inadequate. The Royal Borough must be given much greater assurance as to the quantum and percentage of affordable units to be provided and the timescale for provision. Their "offer" contingent on a September decision attempts to railroad a decision from the planning authority over a scheme of huge scale and major ramifications and in their view should be rejected- the 35%' if thought acceptable, should be subject to firm condition with no strings attached.

**Family dwellings** – A minimum of 20% family dwellings is insufficient to create sustainable communities. The original Planning Statement described studio units as forming up to 10% of the total: the Planning Addendum page 6 states the maximum would be 15% studios. Again such high numbers run counter to claims that sustainable communities will be created.

**Inadequate Public Open Space** – Under the approved 2004 Masterplan 10,010 units were to have access to 19.4 hectares of open space. The applicant proposes that 15,720 homes would only have access to 24ha of open space. On a pro-rata basis, around 30 hectares should be provided.

No justification is produced for this reduction in vital open space which would be exacerbated by 404 extra units at Plot NO201 beside the O2.

**Road Network and Public Transport** – In response to their objections, and those of others, that the increase from 10,010 to 15,720 contributes to extra load (9% more evening peak traffic in Trafalgar Rd) on the local road network
which already lacks capacity and resilience and contributes to illegal levels of air pollution, the applicant states that “Future year and development modeling are in the process of being finalised such that the exact impact can be determined and subsequent mitigation measures provided if required.”

In the light of community concern over air quality, it would be premature to determine the application without this information, especially mitigation.

Public transport is already overstrained and the response from the applicant to their concerns is “All these items require further investigation by means of revised modeling. Once finalised the models can be used to determine the exact impact and subsequent mitigation if required.”

Again it would be premature to determine the application without this information being publicly available.

**Cumulative effect** – Finally, they would draw attention to the cumulative effect that all the various planning consents and applications in the Greenwich area are having and will have on the road network, public transport and infrastructure generally. The impact of each scheme has been considered in isolation to date.

Whatever the final size of the Peninsula scheme it will have a massive impact on all aspects of our community infrastructure and should surely prompt an overall review of the total impact of all the developments, completed, in the pipeline and proposed, so that the full picture can be assessed, understood and mitigation planned so that the community can have confidence that unprecedented levels of regeneration will be sustainable.

### 7.33 East Greenwich Residents’ Association (EGRA)

*Comments dated 28 April 2015*

The EGRA objects to the above application. The Association’s general concern is the scale of the application and the degree of change relative to the approved 2004 master plan; principally a 50% increase in residential units and significant increase in housing density - the height of buildings they believe to be overly aggressive.

EGRA also believe that there has been an inadequate period of consultation and that the consultation has lacked detail. The Association would expect such a significant change to the Masterplan to undergo a more rigorous and transparent process. The impact of visual massing, building density,
occupation density and the resulting increase in traffic flow in and around Greenwich should have been publicly debated with a much broader group of stakeholders and been independently assessed and reviewed to ensure compliance with the council’s 2014 own core strategy.

Specifically, EGRA objects to the submission on the following grounds:

**Residential unit uplift** – The new proposal seeks to increase the residential unit capacity by over 50% from 10,010 units (2004 approval) to 15,720 units. This uplift in residential density is achieved by proposing a large number of tower blocks. These high rise developments, in some cases rising in excess of 40 storeys, are a significant revision to the 10-15 storey blocks consented to in the original plan. Aside from the considerable impact on housing density and population density in East Greenwich and its attendant issues on transport infrastructure, such massing will have a considerable visual impact on Greenwich skyline and will be considerable pressure to bear on the local, mainly residential community.

EGRA would also ask that the council investigate further the assertion that the Greenwich Peninsula can support delivery of 13.5k homes as they believe that that statement relates to an area defined in the London Plan which exceeds the boundary of this application.

**Housing Density** – The resultant increase in housing density appears to be in breach of the London Plan. Elements of the scheme are at a density in excess of 430 units per hectare vs. a recommended density of 405 units per hectare.

**Affordable Housing** – EGRA are concerned that there appears to be no commitment from the developers on the exact percentage of affordable homes. The Association are pleased to note that the level of affordable housing in the completed and approved areas of the peninsula comply with the stated aims of the Councils core strategy (in excess of 35%). The Association do note however, in recent applications for development in the borough, these standards have been allowed to slip and therefore see the potential for similar shortfalls here given the lack of guarantees provided by the developer.

**Sustainable Development** – On a more general level, EGRA would ask the council to investigate the extent to which family housing and the commercial footprint have been adequately provided for in this development. The Association note that a figure of 20% has been provisioned for the former and there is very little detail on the latter. The extent to which Greenwich appears to be rapidly becoming a dormitory town of luxury high rise
accommodation with little social cohesion is a genuine concern of the residents of East Greenwich.

**Transport** – The Association note the developer traffic modelling suggest an increase in traffic flow of between 5 and 9%. EGRA do have general concerns that there is a looming transport crisis for the borough and there seems to be little coordinated thinking with regard to traffic planning. The Silvertown Tunnel, The Cruise Terminal and IKEA to name but three, are all major projects that should be considered together when assessing overall permissions related to traffic impact. The further development of the wharves along the riverside in East Greenwich is of further concern, the potential impact of which seems to have been ignored.

**Open Spaces** – Although they note an increase in size of the central park, the increase in population density far exceeds the uplift in open space provision. EGRA also question the overall impact of this density and the nature of high rise housing on the overall quality of the environment for those who will live, play and work on the peninsula.

**Conclusion** - The EGRA objects to the above application.

Given the scale and scope of this development and the likely impact on both the environment and the community as a whole, they feel strongly that the consultation was perfunctory and opaque. The heights and densities of the proposed residential blocks are excessive and do not comply with recommendations set out in the London Plan.

EGRA have major concerns that the developer’s commitment to affordable and family housing are weak and fall short of the council’s core strategy. The Association believe that the assertions relating to traffic modelling are not credible and, at a minimum, the council should see this proposal within the context of the other major developments in the area that are impacting traffic flow.

The Association also believe that given the uplift in housing density, the commensurate increase in open space is inadequate.

*Comments dated 10th August 2015:*

*See joint response with the Greenwich Society above.*
7.34 The Westcombe Society (WS)

Comments dated 28 April 2015

The WS fully supports and agrees with all the comments in the response to this application from the Greenwich Society and also the response from the ‘No to Silvertown’ group. The Society strongly objects to this application for the reasons they have laid out.

The Society also agrees that the boundary of the new Masterplan to replace the old should be the same in all respects and the parameters and figures given is adjusted accordingly.

WS have major concerns about the traffic implications of this development especially when considered alongside new residential units already under construction and planned, together with the new commercial developments in and around this area. These will all have a significant effect on the Peninsula and perhaps more importantly the surrounding areas, which already suffer congestion and resulting pollution. As the Greenwich Society point out the existing road infrastructure is inadequate and is already under significant pressure. Coupled with an already stretched public transport system further investigation is needed before additional users are added. The Society also support the ‘No to Silvertown’ call for a cycle and pedestrian link from the Peninsula to the Isle of Dogs which would encourage cycling.

WS urge the council to provide an overarching Transport plan to consider the combined impact of all these developments before agreeing any further planning applications. This Transport Plan should also consider the implications of further traffic increase should the Silvertown Tunnel be constructed.

Comments dated 10th August 2015:

See joint response with the Greenwich Society above.

7.35 The Charlton Society (CS)

Comments dated 28 April 2015

Although appreciating some of their features and intentions, in overall terms the CS finds that it has no alternative to objecting to this proposal in the strongest possible terms.
Their main reasons are as follows:

1. A skimpy initial community consultation process
2. A proposal so at variance with the original Royal Borough of Greenwich “vision” for the Peninsula, especially in terms of building heights, mixed use, sustainability and density, that it borders on the shocking
3. No attempt to form visual and other linkages with the existing, traditional hinterland with which even an international destination will have to co-exist to be successful
4. The lack of any commitment to affordable housing or community integration
5. Although understandably schematic at this stage, and while the indicated “neighbourhood” approach is welcome, layout and building forms suggest a paucity of any ground level spaces in residential areas that could conceivably be regarded as at a human scale. Place-making will be difficult to achieve, with many of the proposed spaces anonymous and/or windswept.
6. No attempt to meet the proven need for family accommodation to be at or close to street level where design should follow child-safe, best-practice, Home Zone principles
7. A lack of family accommodation
8. A disturbing confidence in the ability of the Peninsula to cope with traffic movements and commuters during peak hours and the impact on public transport, especially when O2 events are taking place.
9. Absence of direct walkable / cyclable access to the adjacent Canary Wharf business district regretted (Jubilee Line already overcrowded/existing/proposed road tunnels circuitous, polluting and subject to traffic jams).
10. No indication of the impact of vehicle numbers and pollution of the Peninsula proposals on neighbouring areas, not least Charlton, in parts of which bordering the Peninsula pollution from traffic already far exceeds EU limits.

If Knight Dragon’s proposals are ever to amount to anything resembling “London’s Ultimate Village” (which the CS welcomes in principle) they must as a minimum meet the reservations listed above.

7.36 Friends of Greenwich Park

Comments dated 1st May 2015

The Friends of Greenwich Park hereby submit an objection to the above planning application.
They wish to make three points.

Firstly, they are not pleased that they were not sent the details of the planning application directly. The group are on the RBG's list of consultees for projects that have any bearing on the Park and specifically any view from the Park, but they did not receive notification from you, but had to find out about the Knight Dragon proposals by "grapevine". Friends of Greenwich Park are most concerned that the consultation and the timescales set out are woefully inadequate for an undertaking of this size. The group objects to the process, and ask that considerably more time and consultation be undertaken.

Secondly, they are concerned about the likely pressure of people in the Park.

The lack of green space despite the talk in the application of "public realm and open space, hard and soft landscaping" is clearly insufficient for the number of people for which the accommodation will allow. It talks about a "family friendly" development - so for 19,000 units at a conservative estimate of 2 persons per household, there is a potential of some 40,000 new visitors to the Park.

The Group accept that not all will come, and not probably at the same time, but on a lovely summer weekend, the Park could get excessively overcrowded.

The size of the project is excessive, the density of population too great.

The balance between dwellings and green space is tilted far too much towards the former. They object to the overall size of the proposal.

Thirdly, they group are concerned about the skyline. Knight Dragon recognise the importance of Local View 9, the Docklands Panorama from the Wolfe Statue, stating that "the predicted visual effect would be minor to moderate negative during construction and minor positive in operation and not significant". Current buildings and foliage will temper the view. To some extent that is true, but a block of towers, each 40 -42 storeys high will indeed be seen by General Wolfe. The group do not agree that eventually the impact will be "minor positive", they consider it to be "significantly negative".

The impact will be felt much wider from within the Park as part of the World Heritage Site. In particular, the outlook from the ridge which runs from One Tree Hill to Maze Hill gate will alter massively. It has already suffered from the Enderby's Wharf development, but these buildings are modest when
compared to those now proposed. The skyline will change drastically. Friends of Greenwich Park do not wish to halt all development, but lower, less dense tower blocks will fit in more aesthetically with the changing view. They object to the quantity and height of the "taller towers".

The group ask that the Committee reject the application in its current form, and seek a revised proposal from Knight Dragon that takes the objections above into serious consideration.

Comments dated 4 August 2015

It still seems to them that, as there remains so little open space for recreation within the proposal, Greenwich Park will almost certainly be the place of choice for many households to undertake relaxation and outdoor amusement. A population of the size envisaged will therefore have a major impact on the facilities of the Park. A greater amount of open land should be required from Knight Dragon. The Park is also likely to suffer increased cycle traffic presenting a potential danger to Park users.

There has also been no reduction in the height of the towers which again will starkly modify the views from the Park. As the group said before (in the letter of 25 April) "The impact of the new horizon will be felt much wider from within the Park than from Wolfe Statue. The Park is of course part of the World Heritage Site. In particular, the outlook from the ridge which runs from One Tree Hill to Maze Hill gate will alter massively. It has already suffered from the Enderby's Wharf development, but these buildings are modest when compared to those now proposed. The skyline will change drastically. They do not wish to halt all development, but lower, less dense tower blocks will fit in more aesthetically with the changing view. Friends of Greenwich Park object to the quantity and height of the "taller towers".

So, even with the revisions, they ask that the Committee reject the application

7.37 The Blackheath Society (BS)

Comments dated 11 August 2015

The BS wishes to support strongly the objection to this application.

The residents of Blackheath will be affected significantly, albeit indirectly, by this application.
BS are also most concerned at the cumulative effect that this application will have, along with the others for the area, effects which do not seem to have been considered as a whole.

In particular, they highlight the issues of inadequate open public space, and infrastructure, both a consequence of the excessive density of the proposal.

The inadequate provision of public space will have an unacceptable knock on effect on other public spaces in the area, including Blackheath and Greenwich Park. It is unacceptable that developments should be allowed with public space provision so far below that identified in the Master Plan.

Infrastructure – the impact of the proposed development on infrastructure and on air quality, and what might be done to mitigate these, has not been dealt with in the application. Again, failure to properly assess these issues will lead to significant knock on effects for the whole area, well beyond the development itself, including Blackheath. The application should be rejected until and unless these have been assessed.

7.38 No to Silvertown Tunnel

Comments dated 24th April 2015

Introduction: Who ‘No to Silvertown Tunnel’ are and how they got here - No to Silvertown Tunnel is a group set up by residents in southeast London concerned about the impact of Transport for London’s proposed road crossing between the Greenwich Peninsula and Royal Docks. They have measured air pollution on both sides of the Thames, met politicians and planners, held public meetings and campaigned for a more sustainable vision for transport in London.

The group appreciate that many people find it difficult to cross the River Thames between east and Southeast London, but they feel the option promoted by TfL and several local politicians will do little to ease congestion at the Blackwall Tunnel. Indeed, it will merely add to congestion and pollution on the A102, particularly southbound.

Reinforcing this road’s status as a “strategic route” and encouraging more traffic to use the peninsula as a bypass will act as a brake on regeneration and sustainable development on the Greenwich Peninsula. Businesses on both sides of the river including Southern Gas Networks and the ExCel exhibition centre noted the futility of adding more traffic to already congested roads in their response to TfL’s recent consultation into the scheme.
The group believe the Silvertown Tunnel is the wrong scheme in the wrong location. It should be cancelled and replaced with alternative schemes that promote public transport, walking and cycling between the Greenwich Peninsula and communities north of the Thames.

**Why ‘No to Silvertown Tunnel’ are commenting and what they would like to see** – The group pleased to see that Knight Dragon is not depending on the tunnel for its plans to go ahead. Yet whether or not the tunnel is built, they feel the proposed transport plans for the Peninsula are inadequate, and risk leaving residents and businesses with few options for travelling to and from their homes and places of employment.

The group believe the Greater London Authority, Greenwich and Tower Hamlets councils, and relevant landowners should be looking urgently at providing a link for pedestrians and cyclists between the Greenwich Peninsula and Canary Wharf.

Without a pedestrian/cycle connection to Canary Wharf, any further intensification on the Peninsula will simply be unsustainable.

**A word on this planning process** – Firstly, they feel it would be remiss to not comment on the way this application process has been carried out. Treating this enormous planning application in the same manner as an application to build a domestic extension, with minimal publicity and a restricted timeframe to scrutinise 191 documents shows a lack of respect for the people who will have to live with the consequences of whatever decision is made.

Its timing – coinciding with a general election campaign and another large application at nearby Enderby Wharf has been regrettable to say the least.

**Is the traffic modelling reliable?** – Part 8 of Knight Dragon’s transport summary contains predictions for traffic levels on Greenwich Peninsula in 2031 if the Silvertown Tunnel is built. This is the first time traffic predictions for a Silvertown Tunnel in 2031 have been published even TfL’s consultation in late 2014 restricted itself to 2021, just after the tunnel is planned to be built.

The figures, which use TfL’s own modelling, do not take into account induced traffic (the traffic generated by building new roads). They find many predictions are risible, especially considering TfL is openly admitting to a 20% rise in traffic on the Blackwall Tunnel Southern Approach, even with tolling to manage demand.
In particular, they group find the predicted large drops in morning peak traffic at the Blackwall Tunnel baffling when most tunnel traffic is heading to and from destinations reached via the A12, which would be difficult to access from the Silvertown Tunnel’s northern exit at Tidal Basin Roundabout.

The group would remind you that the Hyder Consulting report into a possible Eltham DLR extension, submitted to Greenwich Council in May 2012, predicted the new road, if built without a public transport alternative, “would encourage traffic growth as and when new developments come on stream”, a process which would risk exhausting capacity.

TfL is still not proposing a substantial public transport alternative to the Silvertown Tunnel. Neither study envisages other road crossings being opened; indeed, Knight Dragon is assuming the Woolwich Ferry is still in operation.

So the planning board should consider which version of the future strikes it as most realistic Hyder Consulting’s fears of gridlock, or Knight Dragon’s huge drops in Blackwall Tunnel use.

The TfL modelling used by Knight Dragon is not open to public scrutiny. The group would suggest councillors and planners question the assumptions behind both these figures and the traffic modelling throughout the scheme.

Current proposals show an overreliance on North Greenwich station – Knight Dragon’s new Masterplan contains a significant increase in housing, and is certainly more ambitious in the employment and leisure opportunities it envisages for the Greenwich Peninsula.

But it is over reliant on North Greenwich underground station as a means of accessing the peninsula. The station is the eighth busiest outside zone 1, and is already 4 heavily congested in weekday rush hours and when the O2 hosts major events.

Most London Underground stations are usually expected to serve their immediate locality and adjacent neighbourhoods. But North Greenwich serves an enormous catchment area, stretching out as far as Eltham and Thamesmead, and there are demands for it to serve more areas, notably Kidbrooke Village.
It’s certainly true that the Jubilee Line has transformed travel in Greenwich, Charlton, Blackheath and surrounding areas. But it seems we are asking a lot of North Greenwich station before the Greenwich Peninsula is even halfbuilt.

It is true that Crossrail which regrettably will not directly serve North Greenwich will provide some short term relief. But even London’s transport commissioner believes it will be “full within months”.6

A new bus station is very welcome but it’s not enough – Anyone who has ever used North Greenwich bus station at rush hour will be pleased to hear Knight Dragon plans to rebuild and expand it.

But the feel the current plans offering space for 17 bus stands rather than 15, and 11 bus stops rather than seven aren’t sufficient.

With long term demands for a service to Kidbrooke Village, the possibility of the Greenwich Waterfront Transit being revived, and the need to solve continuing capacity problems on the 108 to Blackheath and Lewisham, we believe more stands and stops will be needed to serve not just residents on the peninsula itself, but those in surrounding areas and further afield.

But most importantly, Greenwich Peninsula residents will need an alternative to the Jubilee Line. This would relieve pressure on the service, provide an option to use in times of disruption, and make it easier for new residents to travel to and from Canary Wharf.

A new pedestrian and cycle connection to Canary Wharf – The group believe that the Greenwich Peninsula can only reach its full potential if it is better linked to its nearest neighbour: the economic, leisure and transport hub of Canary Wharf.

The failure to attract businesses to occupy 6 Mitre Passage is proof of how poorly the area is viewed by companies looking for office space. Indeed, it is notable that Greenwich Council recently placed an Article 4 designation on both Mitre Passage and its neighbouring block in Pier Walk to prevent them from being converted to residential use.

There is nothing in Knight Dragon’s Masterplan that will improve connections between the Greenwich Peninsula and the rest of London. And there is little in the way of action or encouragement from other bodies to fix this.
While a Silvertown road tunnel offers potential for buses to take a circuitous route to Canary Wharf, this benefit is outweighed by the tunnel’s dependence on the congested A102/A2 route to the south, and the A1020/A1261 towards the Canary Wharf and the City, and the likelihood that the tunnel will exacerbate this congestion.

The Emirates Air Line – with no regular Oyster card commuters, and increasingly marketed as a tourist attraction is not a solution as it runs in the wrong direction to Canary Wharf and charges premium fares. While it remains outside normal TfL fare structures, discouraging its use for commuting for all but its nearest neighbours, the cable car cannot be taken seriously as a transport connection.

Any ferry connection between Greenwich Peninsula and Canary Wharf will be little better. As with the cable car, premium fares (as charged by current Thames Clippers services) restrict usage to only the area’s most well off residents.

Instead, Knight Dragon, Greenwich Council, the Greater London Authority and other partners should be investigating the possibility of creating a pedestrian and cycle connection between Canary Wharf and North Greenwich, to aid resilience and boost links between the two.

A pedestrian/cycle connection would be accessible to all, from cleaners to chief executives.

Without it, the sustainability and vitality of what seems set to be largely a dormitory development has to be questioned.

A North Greenwich to Canary Wharf Bridge is a challenge, but possible – A bridge between Drawdock Road and the Isle of Dogs was assessed as part of TfL’s London Cable Car need and business case ahead of planning permission being applied for in 2010. It set the cost at £90m which appears to offer good value compared with the £60m bill for the Emirates Air Line.

While there will be engineering challenges in bridging a river used by large vessels, the assessment says a scheme could be “iconic” and would be “likely to encourage investment” in North Greenwich and Canary Wharf.

In addition, with the key centres of activity growing in both locations, the problem of depositing pedestrians and cyclists in unattractive areas is disappearing.
A bridge would be a landmark for cruise liners heading to the new terminal at east Greenwich. It would also promote walking and especially cycling in the area.

Indeed, a pedestrian and cycle crossing would aid bringing the London Cycle Hire scheme to North Greenwich the new Santander branding even features the O2, despite the scheme not actually serving the area.

There is a proposal for a bridge at Rotherhithe why not for Greenwich? – Sustrans has proposed a bridge for the west side of Canary Wharf, linking it to Rotherhithe, which the government's 2014 National Infrastructure Plan said would be “worth looking at in more detail”, while the Mayor of London has indicated he would back 11 consider backing a scheme.

If the Greenwich Peninsula is to be taken seriously as an integral part of inner London rather than an obscure location out on a limb, fit only for motorway bypasses a similar crossing should be considered.

Just as at Rotherhithe, a crossing to Canary Wharf would also promote walking and cycling in the wider area particularly cycling, where it would form an attractive commuter route from Charlton, Woolwich and other points in the Royal Borough of Greenwich as well as relieving pressure on the existing Greenwich Foot Tunnel.

Conclusion: Doing nothing is not an option this time it’s true – If Greenwich Peninsula is to become a sustainable community that attracts both residents and businesses, then increasing capacity for walking and cycling is a must. It must be easier for people to easily travel short distances without resorting to driving or putting pressure on public transport.

This should apply to trips to employment, shopping and leisure at Canary Wharf as much it should apply to trips to Greenwich town centre, the retail parks in Charlton, East Greenwich’s shops or football matches at The Valley.

The group appreciate that Greenwich’s planning board won’t be able to magic a bridge out of thin air when it meets. But we believe the revision of this Masterplan provides an opportunity for politicians and planners to consider a more sustainable future for Greenwich Peninsula, and how it could be funded.

A favourite mantra of those who are promoting the Silvertown Tunnel is “doing nothing is not an option”. To be frank, they have found this actually
means they’re unwilling to consider the consequences of their actions and would rather avoid answering difficult questions.

But relying on North Greenwich station (and a possible road tunnel) won't ensure a sustainable, successful community. Doing nothing about an alternative link to Canary Wharf really isn’t an option.

Creating a pedestrian and cycle connection across the Thames to one of London’s biggest economic hubs will challenge perceptions that Greenwich Peninsula is inaccessible. It will cement the new district’s success and create additional capacity on existing public transport. Whatever their disagreements over the Silvertown Tunnel, they urge politicians and planners to take this suggestion seriously, for the sake of the future of the Greenwich Peninsula as well as neighbouring communities both within and beyond the borough of Greenwich.

7.6 Local Residents, Neighbouring Properties and Businesses

7.6.1 Following the two public consultation exercises, 42 objections and 2 comments were received from local residents, businesses and neighbours. The following letters of support and objections were received: Most of these comments have been addressed in sections 10 to 48 below in the report.

7.7 Objections from Local Residents

7.7.1 The reasons for objecting can be summarised as follows.

Impact on Public Transport Infrastructure

- Concern is express with regard to the scale of the population increase on the infrastructure, particularly on the road network.

- The extra congestion resulting will cause major inconvenience to residents both new and existing.

- There would be major implications for traffic in our area. Traffic Assessment predicts increases in traffic on the Trafalgar Rd corridor of 5% in the morning peak and 9% in the evening peak hours. All this without taking into account the impact of IKEA, the Charlton retail park expansion, and the other developments in East Greenwich and beyond.
- The Jubilee Line is already one of the busiest tube lines, and has limited scope for capacity improvements.

- The new bus station is welcome but doesn't look adequate for future expansion.

- Politicians and planners must press for a sustainable alternative connection to Canary Wharf for pedestrians and cyclists - TfL costed this at £90m in cable car business case. North Greenwich Jubilee Line risks being overwhelmed without it (even with Crossrail).

- Transport modelling must be subject to tight scrutiny.

- The Council must defer until a proper traffic assessment is done, one that measures/predicts the result of all development in East Greenwich ie IKEA, cruise terminal, Morden, Enderby and Alcatel.

- Traffic increases (up to 9% on Trafalgar Rd for example) cannot be accommodated in addition to already consented developments.

- The road and public transport infrastructure is unable to support such a massive development. North Greenwich underground and buses are already at capacity.

- Should incorporate greater bus capacity than currently offered.

- A cycle and pedestrian connection (tunnel or bridge) to Canary Wharf must be incorporated. This would create a key missing link between the two without relying on the Jubilee Line.

- Transportation: the proposed DLR Extension as identified in the Peninsula West Masterplan SPD is not indicated. This is essential and must connect with Charlton Station.

- The Greenwich Waterfront Transit project must not be resurrected, therefore, no public transport to be routed along Banning Street, Pelton Road, Mauritius Road, Azof Street, Lassell Street or any other nearby streets.

The GWT was cancelled by the Mayor however the Council is looking at a replacement proposal to increase public transport capacity, although this does not form part of this proposal.
There is currently no confirmed proposal for a DLR extension in this area at this time.

**Walking and Cycling**

- Walking and cycling should be made easy and attractive across the entirety of the peninsula site. Cycle routes and parking should be designed according to the TfL London Cycle Design Standards. Current cycle routes on the peninsula are very poor and in dire need of upgrading.

- Object to the proposed development being built without the developers being required to pay for a high quality walking and cycling link between the Greenwich Peninsula and the Isle of Dogs.

- The area around the developments and on the river front should not accommodate any vehicles but rather should be encouraging green modes of travel (cycling/walking)

- Developers in the area routinely take over Thames Path territory

*The feasibility of a pedestrian link between the Peninsula and Canary Wharf has been investigated previously but it is not considered feasible.*

**Parking**

- The development should be car free

*A certain amount of parking is required for people with families, shift workers or people with mobility restrictions.*

**Height**

- The tower blocks will have a negative impact on the local skyline

- The building heights are way in excess of the 2004 Masterplan

- The buildings are too high and will cause overshadowing

- The distribution of the taller elements will create a mixed and unbalanced skyline. Taller elements should be clustered in one or two locations, not spread across the site. This would create a more recognisable site comprising landmarks. It risks otherwise creating overbearing massing. The illustration of Central Park shows this overbearing form of construction. This may mean one or two even taller residential towers in key locations.
- The buildings appear to eclipse and obscure the Dome. They are tightly clustered and the canyon effect will be very claustrophobic for their occupants.

- 40+ floors is too high, overshadowing the O2 and all surroundings - public realm is no good if it is all in the shade with a wind tunnel effect.

**Pollution and Air Quality**

- There will be an increase in pollution, which is already above national requirements

- Concerned about the plans for the new road tunnel which would have an adverse effect on this development. High pollution levels from the extra road traffic and congestion passing through from other unrelated areas will severely detract from quality of life in these new developments.

- Any new transport infrastructure should be futuristic and based entirely on clean/cleaner options. Initially cycling and pedestrian tracks/paths and ideally a cycle/pedestrian bridge across Thames. Public transport, though only electric/hybrid vehicles. A ban on all diesel vehicles on the peninsula, including public service vehicles.

- Objection against the proposals to build a school and health care facilities on the Greenwich Peninsula site on the grounds that they contravene the recent Environmental Audit Committee’s recommendations (refer to their 'Action on Air Quality' report) that no school, care home or hospital should be built in pollution hotspots. A citizen science air quality survey in the area last year shows that NO2 levels are exceptionally high in the area where the school is planned, when the EU legal limits are 40 micrograms per cubic metre, the Millennium Way recorded 80, Millennium Village was 74, West Parkside was 58 and outside the Millennium School it was 51, all showing how heavily polluted the area already is.

- Proposals to build the Silvertown Tunnel on the Peninsular will inevitably bring the expected induced traffic - even Transport for London accept this probability - but they have not yet produced an environmental impact survey and it is the responsibility of our local authority to address these issues. This same House of Commons report says that local authorities are able to include air quality provision in their local planning provision so long as it is consistent with the NPPF, it highlights a need for this regime to move towards air quality
protection. If the Council has not completed its Local Plan yet, then the NPPF itself applies to this case.

**Size and Scale of the development**
- The number of residential units would increase from around 10,000 to 15,000, which would mainly be achieved through building a large number of tower blocks of up to 42 stories high. The original approved planning application (2004) envisaged buildings of 10 to 15 stories. The result would be a much bulkier addition to the Greenwich skyline and the wider landscape.

- Oppose the non-proportional increase in residencies compared to the original plans.

- It was not made clear during the poor consultation, nor in the application, that the numbers of units sought far exceeds the expectations in the Mayor's revised 2014 London Plan and in RBG's Core Strategy.

- The Mayor's Peninsula Opportunity Area includes East Greenwich North of Trafalgar Road and East of the ORNC so the Lovells, Alcatel, Enderbys schemes are within the Area. So Knight Dragon's 15,000 plus units would take the Opportunity Area contribution to more than 19,000, vastly more than the expected contribution in the London Plan of 14,000 plus. This is a huge difference.

- What is the rationale for an uplift of nearly 50% on the previous plans?

**Density**
- The application proposes densities well in excess of the London Plan.

- The high rise density is of a scale to reproduce the problems of previous high rise developments, without any of the real mitigating design factors that can alleviate them, such as community playspace that is equitable, and the ability to be able to work near enough to home to live a sustainable life.

**Affordable Housing**
- There are no commitments given in respect of numbers of affordable housing.

- Object to the decrease in affordable housing compared to the 2004 Masterplan.
There needs to be a clear commitment to providing the appropriate levels of affordable housing in line with the Council’s own commitment to providing affordable housing (ie 35%).

Affordable housing provision is a vitally important element of the Masterplan and makes a substantial contribution to the delivery of mixed sustainable communities. As such it is totally unacceptable for the development to attempt to seek planning permission and seek consultation on the Masterplan with details of affordable housing entirely absent from the application.

The developer refers to the Council’s policy on affordable housing, but also that they refer to the need for any such development to be financially viable. The objector would expect to see the Masterplan area deliver a minimum affordable housing provision of 35% as per the council’s policy and for this to be evenly distributed across the peninsula to ensure mixed sustainable communities.

Given the issues of the lack of openness and transparency on viability that have been exposed for the East Greenwich Peninsula Masterplan area, it is expected that any deviation from the Council’s policy on affordable housing on the West Peninsula should require the viability report submitted by the developer and subsequent independent assessment be made fully available to both the members of the planning committee and wider public. Anything less would be received badly by the community and would no doubt lead to a further protracted and expensive EIR request which should be avoided for the sake of all involved.

The Council must ensure that the developer provides details in the Masterplan of the number, percentage and distribution of affordable housing and that this be made public for consultation;

**Open Space**

The amount of green space being provided is disproportionately small compared to the density.

The increase in the size of Central Park is disproportionately small considering the number of residential units suggested.

There is no commitment to the square metres of public realm
Public Consultation

- Normally an application of this scale - which is in effect a new town on our Peninsula - would be widely consulted on, ahead of it being adopted. Local consultation has been minimal. This application should be refused or deferred for a proper and longer consultation process.

- The consultation simply has not been anywhere near extensive enough, and the rushed process has treated local people with contempt.

- Knight Dragon is in effect building a small new town but with minimal consultation and scant detail. Such a large development should warrant an in depth exploration of the proposal, scale models, architectural plans and technical specifications, none of this has been provided.

- The public consultation letter is not clear

The first round of statutory consultation was extended to allow more time for responses to be sent. The second statutory consultation allowed an additional week for responses.

Social Infrastructure

- Object to the local school being run as a faith school.

- Lack of school places

- Lack of doctors

- Additional infrastructure such as doctors, schools and play areas for children need to be in place for those that already live there.

- The schools and the GP surgeries must be specified as minima, not maxima.
- The play space is not near enough to the homes to allow children to interact socially and become balanced co-operative individuals.

- The area of playspace for over 12s is much lower, and more distant, than for younger children.

- More community facilities are needed – indoors and outdoors
General

- The development not only falls short of that specified in the London Plan, but differs significantly from that specified in the original plans, and is an unacceptable deviation from the original Peninsula Masterplan that the Council was supposedly committed to.

- How will local people benefit if the flats are bought as an investment by foreign owners and either left unoccupied or let out at high commercial rates?

- This huge proposal should be rejected. It turned the area around the Dome into the largest development plot in Europe without thinking through hardly any of the huge life changing implications for the surround areas.

- The previous Farrell Masterplan should be revived.

- Not enough mixed use provided for, more space for small retail facilities, incorporating space for restaurants, retail outlets and other amenities for the local area

- Buildings erected in the local area so far have attracted more and more fast food outlets associated litter

- These plans should be viewed in conjunction with those for Enderby Wharf and the Cruise Terminal, which proposes three very tall towers; also Morden Wharf, which is as yet unplanned and lastly, Lovell's Wharf, which is on the road to completion. the Cruise Liner Terminal and its three adjacent towers will crowd the waterfront and Enderby House severely. We wish to preserve Enderby House, with all its whaling and cable-making history for posterity.

- The Peninsula has a long industrial history. The remaining iconic gasometer, the largest of its kind at the time should be preserved. It would be a shame to lose that, as well as the open feel of what was once marshland.

*It is not considered that the scheme will have an impact on Enderby House.*

*The Council has no control over who buys the units.*

Phasing
- a lack of clarity about phasing which would be key to creating sustainable communities during a long development period.
**Mix of units**

- Vagueness about the proportions of family housing
- A greater number of family homes are needed.

**Impact of the character of the area**

- These proposals show little promise that they will contribute any built heritage worthy of the Royal Borough of Greenwich.

7.8 Councillor Andrew Wood – Tower Hamlets

Objects to not being consulted. The Councillor is a Councillor on the Isle of Dogs and this development will have both major visual and transport implications for the island. The objector is also Secretary of the Isle of Dogs Neighbourhood Planning Forum which is currently in the process of being recognised by Tower Hamlets Council and would like to be added to the list of formal consultees by Greenwich Council. There are two main comments; - 
- Density - will it match London Plan levels or exceed them substantially? - 
- Transport - the GLA is about to launch an OAPF for the island and this has to be factored in given the shared use of the Jubilee line and Blackwall Tunnel. The Forum is are currently tracking 35,000 new housing units under construction, approved, in the planning process, under consultation or being made ready for consultation in the Forum area. This will have a major impact on transport and needs to be considered.

7.9 Mangal Pharmacy

*Comments dated 3rd April 2015*

Mangal Pharmacy believe that the D1 (healthcare facilities) up to 1,462m² should be allocated to a new NHS surgery. Moreover, rather than this 1,462m² allocation being spread out over three locations across the southern parts of the site, as indicated in the plans, it should be concentrated in one location towards the northern end of the site, at Peninsula Central, close to the existing on site NHS Pharmacy there – Mangal Pharmacy at 9 Green Place, Peninsula Central. This new NHS surgery would be away from the existing NHS surgery located just beyond the southern boundary of this application. This would mean a better spread and therefore better access to healthcare over Greenwich Peninsula as a whole.

Locating the future on site healthcare facilities close to each other i.e. close to the existing on site NHS Pharmacy at 8 Green Place (Peninsula Central) will provide an integrated joined up approach to healthcare – the very
‘neighbourhood coherence’ aspired to in the design and access statement of the planning application. Demands on healthcare will inevitably increase as the population of the site increases and ages. It is better to prepare for this now by locating on site NHS healthcare provision together, exactly where it will be needed most in the near future (at Peninsula Central).

Additional, future NHS services should not be placed towards the south of the site as indicated in the planning application, because the southern parts of the site are already well served by the Greenwich Millennium Practice on School bank Road and the associated Newlands Pharmacy in Metcalf Court, West Parkside, Greenwich Millennium Village. If this happened it would result in a duplication of services there and an uneven spread of services over Greenwich Peninsula as a whole. Future demand for a NHS surgery will be at the northern end of the site and this is currently addressed in the planning application which does not take into account that there is already an existing NHS surgery adjacent to the southern boundary of the planning application.

The application has been amended in response to the comments from the Greenwich Clinical Commissioning Group. The three separate sites have since been combined into one building in Peninsula Central.

7.10 The Horniman Museum

Comments dated 10 April 2015:

The Horniman Museum and Gardens own land on the area of the master plan called ‘Lower Brickfields’.

Having looked carefully at the Design and Access Statement it appears that it is proposing to site a public green space right across the entrance to the Horniman’s site, using their land as part of the public space. Page 135 of the design and access statement shows quite clearly a green space right across the site including the entrance.

Whilst it is appreciated that these are not detailed drawings, that the masterplan is an outline document and that detail will follow in the future it would not be acceptable to the Horniman to loose the only access route into their site and they would not be prepared to give up part of their site to provide public green space.

Comments dated 8 May 2015:

The Horniman’s concerns have been addressed.
The applicant confirmed that there is no intention for the green space to cover the entrance to the Horniman building. The application drawing which has been submitted for approval (Drawing (3)) shows the development not to encroach into the land. On this basis a revised ‘Illustrative Masterplan’ was submitted removing the area of green space across the land.

7.11 Greenwich Yacht Club

Greenwich Yacht Club (GYC) have viewed the application (ref.15/0716/O) and as a local community organisation with a long term interest in the quality and opportunities presented by the Thames and its foreshores around the Greenwich Peninsular, can respond as follows:

GYC supports in principle the development of the Peninsula, predominantly as residential and mixed use to support a substantial new community on the Peninsular. While the Yacht Club itself is not directly within or adjacent to the application site the club’s moorings are and the development will impact on GYC in a number of ways, principally:

1) in terms of the sheer increase in numbers of people living, and working on the peninsular and 2) the effect of the development on the Thames itself and the areas the club uses for mooring, sailing and other recreation and training activities. Taking these in turn:

2) The new community: GYC welcomes the potential significant new population on the peninsula and anticipate that the club can offer activities and facilities for any new members that this may bring. GYC has the capacity and appetite for continuing to develop their growing training and activity programme with increased membership. The club already offers events and outreach activity for youth, schools and other organisations and anticipate that this will be a benefit for the new community.

3) The River: GYC are not aware of any reference to the GYC moorings in the application but as these extend all the way up Bugsby’s Reach to the foot of the cable car pylon, they will have an impact on the adjoining foreshore and public access which are part of the application. The moorings are a major aspect of the club and need to be safeguarded from damage or restriction in any development. These are provided from the Port of London of London by agreement contained within a River Works Licence.
The masterplan proposals indicate continued and enhanced access to the Thames Path and to the existing pier (referred to as East Greenwich Jetty). GYC welcome this and would encourage increased lighting and safety measures incorporated in making this important walking route from North Greenwich tube station a safer and more enjoyable place.

The proposed new Clipper stop on the West side of the peninsula is noted. The club has had good relations with the Thames Clippers and would wish to continue to develop this. GYC support the continued use of the river as a transport route, but also point out that leisure boating on the Thames including sailing and rowing require reasonably calm waters. GYC would therefore like to note here that they do think there should be lower speed restrictions placed on these reaches of the river.

Perhaps more importantly, the environment of the foreshore itself is a delicate and quite special ecological aspect of the peninsula. In recent years GYC have witnessed a significant reduction in the mud banks, likely due to the speed of specific river traffic and consequent washing away. GYC would ask that as part of the environmental infrastructure works to the peninsula this delicate matter be addressed. GYC would be happy to share their extensive knowledge of these stretches of the river to assist in this process.

*The applicant has confirmed that the moorings will be protected.*

7.12 **Robert Owen Nursery School**

Raise the following concerns:

- Increasing demand for nursery spaces and children centre spaces – We are concerned that the developers have not considered the increase in residents under 5 years old.
- Facilities at Development – We are particularly concerned that early education and child care provision at proposed developments has plenty of outdoor space.
- Engagement with the community – Robert Owen Nursery School and Children’s Centre would like to be a consultee at an early stage for developments in our reach area.

As part of assessing any major residential development (10 residential units and above) consideration is given to the impact that the proposal could have on local services, which includes education provision. These applications do take into consideration the need to provide for under 5’s and must demonstrate how they will
provide enough outdoor playspace to comply with the requirements of Policy H(e) of the Borough’s Core Strategy (available to view on our website) as well as Policy 3.6 of the Mayor’s London Plan and Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance (available to view on the Mayor of London’s website). The exact details of the play space are usually provided at a later stage in terms of planning conditions.

In respect of applicants confirming the number of children under 5 they anticipate living at a development, the accepted method is the one set out in the Mayor’s London Plan and Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance.

In respect of public consultation, the application undertook extensive public consultation prior to submitting their applications. This is generally the case with all large proposed residential schemes. Such public consultations are usually advertised in the local press beforehand and may also include mail drops to the local area around the proposed application site.

7.13 Wharf Operators

Comments dated 13 April 2015

Hanson is the operator of the safeguarded wharf, Victoria Deep Water Terminal (VDWT) which is adjacent to the proposed development boundary. They object to the application based on technical noise matters but we wish to liaise with the developer, council and Port of London Authority in an effort to seek resolution.

Opening Statement – This Technical Note provides comments on the potential noise implications for existing and future operations at the VDWT as a result of the outline planning application and associated 2015 Masterplan for development of land at Greenwich Peninsula.

An Environmental Statement for the Greenwich Peninsula 2015 Masterplan has been prepared on behalf of Knight Dragon Developments Ltd. The Royal Borough of Greenwich has assigned the application reference 15/0716/O.

The Royal Borough of Greenwich sent a letter dated 24 March 2015 to Hanson Heidelberg Cement Group with a deadline of 21 days to comment on the application i.e. by 14 April 2015.

Hanson is concerned that the proposed development could compromise the existing and future operations at VDWT, both in terms of the type of
activities that could occur on the site and restrictions for night-time activities that are an integral and vital part of this safeguarded wharf.

Joel Morris at Hanson has prepared a list of operations that currently take place within the VDWT safeguarded wharf area and those which could recommence or occur in the future subject to planning permission, for both daytime and night-time periods.

The main concern is that the Masterplan fundamentally fails to incorporate protection for the safeguarded wharf operators and the occupants of residential buildings. Planning conditions on noise and the exact specifications for acoustic mitigation should not be left until each plot of land comes forward for development.

Comments on ES Chapter Noise Assessment for VDWT – Despite the exchange of emails between RPS and Greenwich in December 2014 (Appendix 7.1) neither wharf source noise level data nor prediction of future wharf noise levels are included in the ES chapter or appendices.

The ES chapter appears to rely on noise measurements at Location L2 (paragraph 7.4.16) but with no knowledge of whether any activities were being carried out in the night-time (paragraph 7.6.4).

It is acknowledged by Hanson that currently there is minimal night-time ship unloading but proper allowance should be made for the recommencement in future of delivery of aggregate by dredger and deliveries of hard stone via self-discharge ship.

It is therefore appropriate that the ES chapter should have included noise source data and noise predictions for VDWT, as envisaged in the exchange of emails in December 2014, so that noise sources not taking place during the period of monitoring at Location L2 could also be assessed, particularly for the night-time period.

The approach in the ES chapter for VDWT is to use “typical” values for daytime and night-time from the measurements at Location L2 and to determine the “Minimum Facade Reduction Required to Achieve Guideline Internal Noise Level” (Table 7.8 “BS 8233 Noise Assessment for Residential Areas and Hotels”).

In BS8233: 2014 paragraph 6.5.2 states “Where industrial noise affects residential or mixed residential areas, the methods for rating the noise in BS 4142 should be applied.”
In BS8233: 2014 paragraph 7.7.1 “Dwelling houses, flats and rooms in residential use (when occupied)” states “This sub clause applies to external noise as it affects the internal acoustic environment from sources without a specific character, previously termed “anonymous noise”. Occupants are usually more tolerant of noise without a specific character than, for example, that from neighbours which can trigger complex emotional reactions. For simplicity, only noise without character is considered in Table 4.” A Note associated with the sub clause states “Noise has a specific character if it contains features such as a distinguishable, discrete and continuous tone, is irregular enough to attract attention, or has strong low-frequency content, in which case lower noise limits might be appropriate.”

Accordingly, whilst BS8233: 2014 can be used as a guide for internal noise levels, there should be considerably more emphasis on the BS4142: 2014 “Methods for rating and assessing industrial and commercial sound” for noise arising from VDWT.

The ES chapter refers to BS 4142: 2014 (on page 7.10) and specifically for “Mechanical Plant and Commercial Delivery Vehicles” (paragraph 7.4.36). There is no reason provided why BS4142: 2014 should not be applied to noise arising from VDWT with the same approach namely “Any potentially adverse impacts from industrial and commercial activities will be controlled by design.”

The ES chapter at paragraph 7.4.38 states “An initial estimate of the impact of the specific sound is obtained by subtracting the measured background sound level from the rating level of the specific sound. Section 11 of BS 4142:2014 states the following in relation to the assessment of impact:

‘Typically, the greater this difference, the greater is the magnitude of the impact.

A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context.

A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context.

The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.’

Paragraph 7.4.39 states “In the context of the Standard, adverse impacts include, but are not limited to, annoyance and sleep disturbance.”
It is apparent from examination of the measured noise levels at Location L2 that using BS4142: 2014 “Methods for rating and assessing industrial and commercial sound”, for noise arising from VDWT, would result in “an indication of a significant adverse impact, depending on the context”.

Whilst the NTS states “in order to provide protection from high levels of road traffic noise and noise from activities on the neighbouring Victoria Deep Water Terminal Wharf (VDWT)” and the ES chapter acknowledges the need for “more robust mitigation” for night-time activity at VDWT (paragraph 7.7.59), there has been no attempt to quantify the night-time noise levels and the development parcel and plot numbers for which the “more robust mitigation” would be required.

Comments on GMV and Noise Mitigation Measures – The author of this Technical Note has been advising safeguarded wharf operators and the Port of London Authority since 2008 in connection with the potential noise implications relating to the Greenwich Millennium Village (GMV) development adjacent to the safeguarded Angerstein and Murphys Wharves on the Greenwich Peninsula.

Officers at the Royal Borough of Greenwich have obviously been closely involved with the GMV development and safeguarded Angerstein and Murphys Wharves and are aware of the noise mitigation measures that are integral to allowing those adjacent developments.

Detailed site noise calculations, using wharf noise source data and noise prediction software, have been undertaken over the GMV development area to determine the attenuation effects of separation distances and barrier attenuation afforded by the GMV development itself as it is built.

One fundamental mitigation measure for GMV is a “barrier block” along the closest edge of the development to the safeguarded wharves so that other dwellings can be shielded from noise arising from the safeguarded wharves.

Another fundamental mitigation measure for GMV is sealed windows for the facades of building facing directly onto the safeguarded wharves and other measures such as “winter gardens” for less exposed facades.

Clearly, the order of building within the overall development is critical, with the need for the “barrier block” to be complete before other “shielded” parts of the development are occupied.
It is recommended that similar conditions on noise, as included in the permission for GMV, are included for the current outline application for land at Greenwich Peninsula.

The noise conditions relate to internal and external noise limits, along with requirements for noise testing and demonstration of compliance with the noise limits.

One particularly important noise limit is the one related to low frequency noise associated with ship unloading, which can take place anytime day or night.

**Suggested Next Steps** - On 1st April 2015, Hanson requested additional time for consultation and as of 13 April 2015 no response had been received from the London Borough of Greenwich. It is important that more time is allowed for the suggested next steps:

Hanson to provide details of VDWT activity to developer and their noise consultants, during the monitoring period of 20 January 2015 to 03 February 2015 and for those which could recommence or occur in the future subject to planning permission, for both daytime and night-time periods.

Hanson and WBM would welcome a meeting with the PLA and Council to discuss the observations and concerns of Hanson and the PLA relating to the noise assessment.

The developer and their noise consultants should be asked to provide site noise calculations and a BS4142: 2014 assessment for noise arising from VDWT for land at Greenwich Peninsula.

Based on experience of the GMV development adjacent to the safeguarded Angerstein and Murphys Wharves, the London Borough of Greenwich should provide guidance on what is required for noise mitigation measures to protect the safeguarded wharf operations at VDWT.

The developer and their noise consultant should be asked to consider the noise conditions and associated external and internal noise limits, including for low frequency noise, that were included as part of the GMV development permission.

**Closing Statement** - This Technical Note provides comments on the potential noise implications for existing and future operations at the Victoria Deep Water Terminal (VDWT) as a result of the outline planning application and associated 2015 Masterplan for development of land at Greenwich Peninsula.
Hanson is concerned that the proposed development could compromise the existing and future operations at VDWT, both in terms of the type of activities that could occur on the site and restrictions for night-time activities that are an integral and vital part of this safeguarded wharf.

The main concern is that the Masterplan fundamentally fails to incorporate protection for the safeguarded wharf operators and the occupants of residential buildings. Planning conditions on noise and the exact specifications for acoustic mitigation should not be left until each plot of land comes forward for development.

The developer and their noise consultants should be asked to provide site noise calculations and a BS4142: 2014 assessment for noise arising from VDWT for land at Greenwich Peninsula.

The developer and their noise consultant should be asked to consider the noise conditions and associated external and internal noise limits, including for low frequency noise, that were included as part of the GMV development permission.

On the above basis, Hanson objects to the outline planning application.

Comments dated 1 May 2015

Hanson concurs with the PLA’s comments in their email dated 24th April 2015 sub-heading Air Quality. Given the very close proximity of the proposed development blocks to Victoria Deep Water Terminal it needs to be ascertained what levels of dust would be experienced at the application site as a result of operations at VDWT, Bay Wharf and Tunnel Wharf. Mitigations then need to be identified, secured, implemented and maintained.

Comments dated 3 August 2015

Development Specification Document – The Development Specification document now includes for the provision of an “Initial Noise Assessment to inform design mitigation strategy (In relation to the Zonal Masterplans adjacent to the VDWT (Zonal Masterplan A and E)).”

Response to the PLA – It is stated on pages 6 and 7 under the heading “4. Noise” that “RPS has reviewed the sound monitoring data at the time when the vessel was at berth. The data provides no indication of elevated sound levels during the period when the vessel was at berth in comparison to typical levels over this
period on other days, with the only exception being on period of elevated sound levels at the time of the vessel’s arrival. The monitoring therefore indicates that the vessel unloading was not a significant source of sound at the monitoring location.” The text of the WSP response refers to information received from Hanson and specifically for the Arco Axe which indicated the vessel arriving at 20:25, commencing discharging at 20:45 and departing at 02:30.

At a meeting on 04 June 2015, Dr Cockcroft requested the ‘raw’ survey data in 1-minute intervals for the LT2 measurement location and that data was sent from Susan Hirst at RPS Planning & Development to WBM on 11 June 2015. Dr Cockcroft has analysed the RPS data for Location LT2 and two graphs are included as Appendix 1 to this Technical Note; one for a 12 hour period starting 19:00 on Friday 30 January 2015 and another for a 12 hour period starting 19:00 on Friday 23 January 2015 for comparison.

The difference between the two graphs is so clear, for both the arrival and unloading periods, that there is no doubt about the significance of that source at the monitoring Location LT2. It is not correct to state “The data provides no indication of elevated sound levels during the period when the vessel was at berth in comparison to typical levels over this period on other days, with the only exception being on period of elevated sound levels at the time of the vessel’s arrival.”

On page 9, the final bullet point with the Applicants comments in response to the WBM Technical Note dated 13 April 2015 states “The applicant is prepared to accept the principle of sealed windows and winter gardens as part of the detailed design for the plots closest to the wharves if further assessments at the ZMP stage to inform the mitigation strategy for the detailed design, demonstrate that openable windows cannot achieve the required attenuation when closed. The final mitigation strategy for the development will be informed by the initial noise assessment at the ZMP stage. The principle of the need for appropriate mitigation is not disputed.”

The relevance and importance of this principle of the need for appropriate mitigation must follow through to conditions to be required by the Royal Borough of Greenwich for the Masterplan.

Planning Conditions –
It is recommended that similar conditions on noise, as included in the permission for GMV, are included for the current outline application for land at Greenwich Peninsula.

The noise conditions relate to internal and external noise limits, along with requirements for noise testing and demonstration of compliance with the noise limits.
One particularly important noise limit is the one related to low frequency noise associated with ship unloading, which can take place anytime day or night.

The acoustic criteria from the GMV Environmental Statement, which were referred to in planning conditions issued by the Royal Borough of Greenwich Council, are included as Appendix 2 to their Technical Note and as shown below:

Internal noise level criteria for residences - The 6 criteria from the Environmental Statement referenced in the planning condition are reproduced below:

- **Criterion 1** is the maximum external façade noise level from all wharf and dredger sources operating at a cumulative maximum, for habitable rooms with opening windows i.e. $L_{A_{eq}}$ 44 dB.
  - Where façade level exceeds $L_{A_{eq}}$ 44 dB, habitable room windows will be fixed shut.
  - Non-habitable room windows would only open if it can be demonstrated that noise levels in the nearest habitable rooms are ≤ $L_{A_{eq}}$ 30 dB with internal doors open.

- **Criterion 2** is the maximum dredgers-only noise level at 63Hz octave-band, inside any habitable room i.e. $L_{A_{63Hz}}$ 24 dB (that is $L_{A_{63Hz}}$ 50 dB, or NR 19).*
  - This will ensure a level of extra protection to residents from low-frequency noise in particular where façade levels exceed 39dB(A) at 63 Hz i.e. habitable room windows are recommended to be fixed shut.
  - Wall / ceiling affected by excess low-frequency noise should have enhanced construction or insulation.

- **Criterion 3** is the maximum noise level in habitable rooms at night i.e., $L_{A_{eq}}$ 30 dB [WHO, BS 8233 ‘good’]
  - Includes all external noise sources (i.e. Criterion 1 plus night-time traffic / environmental sources).
  - To include mechanical services noise.

- **Criterion 4** is the maximum noise level in bedrooms during the day i.e., $L_{A_{eq}}$ 35 dB [BS 8233 ‘reasonable’]. The maximum noise level in other habitable rooms during the day is $L_{A_{eq}}$ 40 dB [BS 8233 ‘reasonable’].
  - Includes all external noise sources (i.e. Criterion 1 plus daytime traffic / environmental sources).
  - To include mechanical services noise.
• **Criterion 5** is the maximum target noise level in public / private outdoor areas (i.e., balconies, gardens) i.e. $L_{Aeq}$ 55 dB [BS 8233 ‘upper limit’].
  - Includes all external noise sources (i.e. Criterion 1 plus traffic / environmental sources)
• **Criterion 6** is that individual noise events shall not normally exceed 45dB $L_{A_{Fmax}}$ in bedrooms at night [BS8233]

It is understood that the applicant and the wharf operators have reached agreement on suitable conditions. These have been included in the recommendation.

7.14 DZT on behalf of National Grid Property (NGP) and Southern Gas Networks (SGN)

7.14.1 DTZ are appointed jointly by National Grid Property (‘NGP’) and Southern Gas Networks (‘SGN’) to advise them on their combined landholdings at Greenwich Peninsula.

DTZ are aware that there are currently a number of discussions ongoing with various stakeholders including the Royal Borough of Greenwich, Greater London Authority and Transport for London. As part of DTZ’s instruction, they are aware of the planning application by Knight Dragon Developments Ltd (‘Knight Dragon’) on land at Greenwich Peninsula and have reviewed this on behalf of their joint clients.

This letter is written formally on behalf of NGP to object to the planning application by Knight Dragon as it does not appear to impact on the SGN operational estate. The major outline planning application seeks permission for comprehensive mixed-use development across a large part of Greenwich Peninsula to the south of the O2 Arena, including land in NGP’s ownership.

**National Grid Property Land Ownership** – NGP occupy land between Millennium Way and The New Blackwall Tunnel Road (A102). The land lies partly within the planning application boundary and partly outside it. A plan showing the ownership of NGP (in blue) and SGN (in red) which directly affected by the Knight Dragon application has been provided.

The land in NGP’s ownership that lies within the planning application boundary is shown on the Illustrative Masterplan that accompanies the planning application as partly for the approach road to the new Silvertown Tunnel and partly for a coach park.
Representations – Whilst NGP support the principle of development in this area and the significant regeneration benefits that this will bring to part of London, they are very concerned that the Knight Dragon scheme:

1. Has failed to have regard to the proposed Silvertown Tunnel and associated safeguarding area as defined by Transport for London;
2. Has failed to have regard to the Health & Safety Executive (HSE) Zones and associated PADHI guidance which restricts development around gas holders;
3. Has failed to be assessed against the planning guidance in the Greenwich Peninsula Opportunity Area Planning Framework (2012);
4. Has failed to consult with NGP in relation to their landholdings and future development aspirations; and
5. Does not make best use of land around the Silvertown Tunnel approach road.

DTZ’s clients’ concerns on these key points are outlined in more detail below:

Proposed Silvertown Tunnel – NGP are aware of the importance placed on the new Silvertown Tunnel and the significant regeneration benefits it would bring to the area. They are aware that further consultation on the proposed tunnel is due to take place in September 2015 and that it is anticipated that the tunnel could be delivered by 2021/22.

NGP are aware that land on both sides of the proposed tunnel has been safeguarded from development to ensure that the Tunnel can be delivered. The Knight Dragon application has not had regard to these safeguarded areas and indeed proposes significant development in these areas.

Health & Safety Executive Zones – NGP are also concerned that the planning application has no regard to the Hazardous Substances Consents that exists on both the Brenntag Chemicals and the SGN holder sites. These 2 safety zones which restrict development are shown in the plan in the Greenwich Peninsula Opportunity Area Planning Framework.

Planning Policy Context – NGP are aware of the planning policy framework against which the planning application will be determined, in particular the identification of the site as an Opportunity Area and Regeneration Area in the Further Alterations to the London Plan (2015) (FALP). Of note, the Planning Statement and Design & Access Statement that accompanies the planning application both make reference to the London Plan (2012) whereas this document has now been superseded by the FALP. These documents should
be updated to reflect this although we are aware that the identification of the site as an Opportunity Area and Regeneration Area remains unchanged.

Of particular significance is the guidance provided on page 347 of the FALP which outlines the Mayor’s aspirations for the Greenwich Peninsula Opportunity Area including 13,500 new homes and 7,000 jobs. The FALP refers to the Greenwich Peninsula Opportunity Area Planning Framework for the area being adopted. NGP are concerned that the planning application for major development at Greenwich Peninsula has failed to have regard to the Greenwich Peninsula Opportunity Area Planning Framework (2012) which should be regarded as a key planning policy document which has regard to the wider Opportunity Area – including land within NGPs ownership.

Consultation and Engagement – NGP are particularly concerned that they have had no pre-application discussion with Knight Dragon in relation to the proposed development. Given the scale of the proposed development and as the application includes land within (and adjacent) to NGP’s landownership, then Knight Dragon and their advisers should have consulted NGP on the draft application in advance of submission to the Royal Borough of Greenwich.

Potential Future Development of Land around the Silvertown Tunnel Approach Road – NGP would like to emphasis their willingness to work with the Royal Borough of Greenwich and other key stakeholders in facilitating the regeneration of this part of London. In order to do this, it is essential that land which may be surplus to the future requirements of NGP is identified for future development as part of the wider regeneration of the Opportunity Area.

NGP and SGN would therefore like to work closely with the Royal Borough of Greenwich to designate their site for future residential (or residential-led mixed use) development as part of a wider strategy that may see part of the land in their ownership being utilised for the future tunnel approach road.

NGP particularly object to the inclusion of a coach park on land partly in their ownership. This is not considered to provide the best use of land in this area within close proximity to public transport and indeed this area of land is subject to ongoing negotiations with TFL for the relocation to this site of the proposed vent stack and buildings associated with the tunnel.

In summary, NGP formally object to the planning application by Knight Dragon on land at Greenwich Peninsula as it fails to have regard to the safeguarding areas for the proposed Silvertown Tunnel; fails to have regard to the HSE zones and PADHI guidance on development around gas holders; fails
to have regard to the Greenwich Peninsula Opportunity Area Planning Framework; has not been the subject of consultation with NGP; and fails to make best use of land for future development in this area. Unless these matters are addressed to the satisfaction of the Council, TFL, GLA, HSE and other statutory consultees, then the planning application should be refused.

Prior to determining the planning application, it is strongly requested that engagement takes place between all key stakeholders.

Silvertown Tunnel
The development proposals and the Silvertown Tunnel proposals are consistent and are able physically to co-exist. See paragraph 4.40 of the Planning Statement, page 22 of the Design and Access Statement, and the Transport Assessment paras 6.3.25–26. The applicant is in ongoing dialogue with TfL regarding the Silvertown Tunnel, and they have not objected to the proposed development.

HSE Zones
The constraints on the 2015 Masterplan due to the remaining gas holder and the Brenntag site are considered on p.24 of the Design and Access Statement, and elsewhere within the application documents.

HSE have no objection to the application (see their comments above).

Planning Policy
In relation to London Plan policy, the letter refers to no specific deficiency in the analysis provided in the application documents. It is the Council's decision which must be made against the policy as it stands at the date of determination. The London Plan's treatment of this Opportunity Area is addressed in several places in the Planning Statement and elsewhere.

The draft version of the 2015 FALP as existed at the time of the application submission is addressed and recognised as a material consideration at pp.31–32 of the Planning Statement. The adoption of the FALP (following the submission of the application) does not change the conclusions drawn in the Planning Statement. The Council's determination will of course be made against the adopted FALP.

As discussed with RBG and the GLA the "Greenwich Peninsula Opportunity Area Planning Framework" does not exist. Through discussions with the GLA, the Framework referred to in 2015 FALP, relates to the 2004 Masterplan and the Greenwich Peninsula West Masterplan SPD (2012). However, the latter only covers the western part of the Peninsula and only a small part of the land within the 2015 Masterplan area falls within the area covered by it. This SPD is therefore not considered to be a "key planning policy document". These documents do not change the conclusions drawn in the Planning Statement.
Consultation with NGP
In terms of engagement with SGN and NGP, the applicant has had ongoing confidential dialogue with them both over the last three years concerning their landholdings, and their interrelationship with the 2004 Masterplan (which could currently be built out in its entirety), and indeed the 2015 Masterplan.

The application was consulted upon publically at pre-application stage (11–13 December 2014, 22–24 January 2015). Both NGP and SGN were notified in writing of the application, and will be aware of the application both through that, site notices, and publication.

Best Use of Land around Silvertown Tunnel
The proposals in this area of the Masterplan site are entirely consistent with the approach taken in the 2004 Masterplan (where the land designation was for highways / parking purposes). The 2004 Masterplan could be built out in its entirety now. Whilst NGP/SGN’s proposals are a material consideration in the determination of this application, given the stage they have reached they can only be of limited weight.

The proposed layout for the coach parking spaces is only illustrative at this stage and is shown on the Illustrative Masterplan Drawing only, which is not for approval. As the 2015 Masterplan is illustrative, it merely shows an indicative layout of what could be achieved. The layout and location for the coach parking spaces will be reviewed further at the Zonal Masterplan and Reserved Matters stage which can be accommodated without necessarily being on NG land.

Finally, it is worth reiterating the applicant’s commitment to engagement throughout the consenting process for the regeneration, which will be a multi-faceted process. They will continue to engage and consult as required and necessary at each of those stages.

7.15 Montagu Evans (ME) on behalf of AEG Ltd

Comments dated 14 May 2015

ME write on behalf of their client, AEG Europe Limited, regarding the above application which is currently being considered by the Royal Borough of Greenwich (RBG). Their client has significant land interests in the Peninsula, most notably The O2, and a number of other land holdings, including Plots NO201 and NO301 of the current Peninsula Masterplan.
The O2 is recognised as one of the most popular indoor entertainment venues in the world. Given its continued importance to London and the Royal Borough, together with its position as a major cultural attraction of international appeal, we have reviewed the proposals to ensure that the new Peninsula Masterplan does not detract from The O2’s unique offer or impact upon its operation, with consequential impacts on the local and regional economy.

ME’s client generally supports the aspiration for an up-to-date Masterplan, which responds more appropriately to the current context. However, they have a number of concerns regarding specific elements of the application and, in particular, the lack of certainty provided by the outline application.

Whilst their client understands that the Masterplan proposed through this outline planning application must contain flexibility in order to allow reserved matters to properly respond to the future context, they are concerned that the parameter plans submitted provide little certainty about how the development will come forward and what impact the currently unknown built form will have on The O2. Such certainty is essential to landowners such as AEG when compiling long term investment strategies. In determining such strategies, investors look to rely on the planning system to deliver a level of certainty over future development opportunities and asset management. For the following reasons they believe the current proposals fall short; albeit such shortcomings can be easily addressed. The main concerns are set out below:

1) The proposed ‘Design District’ allows for a mixture of class A, B and D uses. Whilst their client understands that a degree of flexibility is required, the application does not provide sufficient information in order for them to consider the potential impacts on The O2. Therefore, they request that RBG seeks further information regarding the nature of the proposed development and the timescales in which the applicant intends to deliver the ‘Design District’. ME would also request that RBG require further information regarding the timescales of delivery for this and other parts of the development.

2) The Masterplan proposes to relocate and re-provide 2,000 of the existing 2,200 car parking spaces. The parameters submitted indicate that seven storeys of car parking would be provided with residential uses above in a building located to the south of the proposed bus station. The parking would be wrapped in business and retail uses. Further detail regarding the access in and out of the car park does not appear to be provided in the application supporting material. Given the importance of the car parking to The O2, they consider that this level of information should be provided as
a minimum in order to have some certainty regarding access to the car park, direct connectivity to The O2 and the suitability of this.

3) The Design Guidelines Document states that a route from the Station Interchange Hall, towards The O2 parking facility, will be provided by way of a pedestrian bridge that crosses over the new bus station. ME’s client supports the principle of the pedestrian bridge to the car park. However, the design of the route and its quality is not provided within the application. Given the importance of the parking to the successful functioning of The O2, and the Peninsula as a whole, we request that RBG seek additional details and certainty of the proposed routing and design of this access to the car park and take steps to ensure that this is delivered in an appropriate timescale to minimise the disruption to users of The O2.

4) The proposed Masterplan includes the demolition of the existing underground station and bus stand and the re-provision of these facilities in a new building (Plot 7). The Station would be located in a similar location as the existing whilst the new larger bus stand would be located to the south of the station. They note that the proposed Masterplan would also re-provide a taxi rank with an increased capacity.

As you will be aware, the North Greenwich Transport Interchange is of vital importance to the safe operation of The O2 and therefore even a short term closure or reduction in capacity of the interchange would have a significant impact on The O2. They therefore request that RBG secure further detailed information regarding the proposed phased re-provision of the facilities and seek certainty that full existing operational capacity of the Transport Interchange will remain throughout works associated with the proposed redevelopment.

5) The application includes the provision of almost 20,000 sq. m of leisure/entertainment floorspace (D2 use). However, it does not provide any indication of the nature of the proposed leisure attraction. The O2 contains a significant amount of leisure floorspace and a variety of entertainment uses, which contribute to the overall success of the venue and accordingly the health and vitality of the District Centre. Given the potential for a significant increase of new leisure and entertainment floorspace within the centre, they request that RBG seek further certainty regarding the nature of the proposed D2 use to enable a robust assessment of the impact of this upon the district centre.

6) The proposed indicative layout and perimeter plans indicate that the route to and from the Underground Station to The O2, Plot NO201 and the
public square in front of The O2 would remain largely unchanged. However, they note that the perimeter plans do not place parameters on the width of the routes, the public space or the depths/locations of the buildings. Their client is therefore concerned that the parameter plans do not provide sufficient control over this access route given its fundamental importance in providing safe public access between The O2 and the transport interchange.

They request that RBG, at the very least, secure a minimum width for this access route between the station and Peninsula Square area. Given the importance of this route to the safe operation of The O2, they consider that the Council should require that the access elements and streetscape between The O2 and the new transport interchange be provided in detail in order to allow a full assessment of the impact on the functioning of The O2 and retain sufficient control over this fundamental access route, and hence its impact on the vitality and viability of the district centre.

7) Their client also requests that confirmation from the application that access to The O2, Plot NO201 and Plot NO301 will not be restricted during the construction process and that any plans to alter access to the Peninsula will be predicated on a requirement to sustain or enhance such access before any remodelling work can be implemented.

The application supporting material indicates that the proposal will have a negative impact on quality of daylight and sunlight received by Plot NO201. The 2015 Masterplan daylight and sunlight study tested the consented office scheme for NO201. Recently the Council have provided positive pre-application advice in relation to a residential use on Plot NO201 and an application is currently being prepared for submission. This will be much more sensitive to the impact of the Masterplan proposals. As such, they take this opportunity to remind the Council of our Client’s development aspirations for Plot NO201 and ask that these aspirations are taken into account when assessing this application. To ensure that the proposed Masterplan does not prejudice the future redevelopment of Plot NO201.

As noted, through the submission of further information, we believe all these concerns can be readily resolved prior to approval of the outline application. Given the importance of this to their client being able to properly assess the impact of the proposals, they are not matters to be deferred to the reserved matters stage. Consequently, their client reserves the right to formally object to the application should these matters not be properly resolved through submission of further information. ME would be
grateful for confirmation of when any additional material is received by Greenwich Council.

_The level of detail in the application is considered to sufficient for an outline proposal._

8. **Planning Context**

8.1 **National Planning Policy Framework (NPPF):**

8.1.1 This document came into force on 27th March 2012. The NPPF provides Central Government’s overarching planning policy. The principles and policies contained in the Framework which includes a presumption in favour of sustainable development should guide the preparation of local plans that reflect the vision and aspirations of local communities. Three dimensions to sustainable development: an economic role contributing to building a strong, responsive and competitive economy; a social role supporting strong, vibrant and healthy communities and an environmental role contributing to protecting and enhancing our natural, built and historic environment. The Framework identifies 12 core land-use principles that should underpin decision making and plan preparation. These aim at building a strong competitive economy, vital town centres, prosperous rural economy, sustainable transport, advanced communications infrastructure, range of quality homes, good design, healthy communities, protect green belt, meet the challenge of climate change, conserve and enhance the natural and historic environment. Encourage all those in the planning process to engage all stakeholders at an early stage. Ensure effective enforcement.

8.2 **The London Plan (March 2015 – consolidated with alterations since 2011) – including MALP**

8.2.1 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20 – 25 years. The documents bring together the geographic and locational (although not site specific) aspects of the Mayor’s other strategies – including those dealing with:

- Transport
- Economic Development
- Housing
- Culture
• A range of social issues such as children and young people, health inequalities and food
• A range of environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste.

8.2.2 In March 2015, the Mayor published the London Plan with all consolidated alterations to the London Plan since 2011. It is the policies in these documents (and any subsequent Alterations to it) that form part of the development plan for Greater London, and which should be taken into account in taking relevant planning decisions, such as determining planning applications.

8.2.3 On the 11th May 2015, the Mayor of London published for six weeks public consultation two sets of Minor Alterations to the London Plan (MALP) – on housing Standards and on Parking Standards. These minor alterations have been prepared to bring the London Plan in line with new national housing standards and car parking policy.

The primary policy objectives of the London Plan to ensure that London is:

• A city that meets the challenges of economic and population growth;
• An internationally competitive and successful city;
• A city of diverse, strong, secure and accessible neighbourhoods;
• A city that becomes a world leader in improving the environment; and
• A city that is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

8.2.4 The following London Plan policies relevant to this application are:

London’s Places

2.9 Inner London
2.13 Opportunity Areas and Intensification Areas
2.14 Areas for Regeneration
2.16 Strategic Outer London Development Centres

London’s People

3.1 Ensuring Equal Life Chances for all
3.2 Improving Health and Addressing Health Inequalities
3.3 Increasing Housing Supply
3.4 Optimising Housing Potential
3.5 Quality and Design of Housing Developments
3.6 Children and Young Play and Informal Recreation Facilities
3.7 Large residential developments
3.8 Housing Choice
3.9 Mixed and Balanced Communities
3.10 Definition of affordable housing
3.11 Affordable Housing Targets
3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes.
3.13 Affordable Housing Thresholds
3.16 Protection and Enhancement of Social Infrastructure
3.17 Health and social care facilities
3.18 Education facilities
3.19 Sports facilities

London’s Economy

4.1 Developing London’s Economy
4.2 Offices
4.3 Mixed use development and offices
4.5 London’s Visitor Infrastructure
4.6 Support for an enhancement of arts, culture, sport and entertainment
4.7 Retail and Town Centre Development
4.12 Improving opportunities for all

London’s Response to Climate Change

5.1 Climate Change Mitigation
5.2 Minimising Carbon Dioxide Emissions
5.3 Sustainable Design and Construction
5.5 Decentralised Energy Networks
5.6 Decentralised Energy in Development Proposals
5.7 Renewable Energy
5.9 Overheating and Cooling
5.10 Urban Greening
5.11 Green Roofs and Development Site Environs
5.12 Flood Risk Management
5.13 Sustainable Drainage
5.14 Water Quality and Wastewater Infrastructure
5.15 Water Use and Supplies
5.17 Waste Capacity
5.18 Construction, Excavation and Demolition Waste
5.21 Contaminated Land
5.22 Hazardous Substances and Installations

London’s Transport

6.3 Assessing Effects of Development on Transport Capacity
6.9 Cycling
6.10 Walking
6.12 Road Network Capacity
6.13 Parking

London’s Living Places Spaces

7.1 Building London’s Neighbourhoods and Communities
7.2 An Inclusive Environment
7.3 Designing out Crime
7.4 Local Character
7.5 Public Realm
7.6 Architecture
7.7 Location and Design of Tall and Large Buildings
7.8 Heritage Assets and Archaeology
7.13 Safety, Security and Resilience
7.14 Improving Air Quality
7.15 Reducing Noise and Enhancing Soundscapes
7.26 Increasing the use of the Blue Ribbon for freight transport
7.27 Blue Ribbon Network: Supporting Infrastructure and Recreational Use
7.29 The River Thames

Implementation, Monitoring and Review

8.2 Planning Obligations
8.3 Community Infrastructure Levy

8.3 The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy”)

8.3.1 The Core Strategy was adopted on 30 July 2014. It is the key strategic and statutory planning document for Royal Greenwich and will guide decisions about the developments that will take place over the next 15 years. It also contains detailed policies that will be used to assess planning applications. Therefore, the Core Strategy is an integral part of Royal Greenwich’s Development Plan, which is currently formed of the Mayor’s London Plan, the Core Strategy, and the remaining parts of the Royal Borough’s Unitary Development Plan.
Development Plan (2006) (UDP) that have not been superseded, amended or deleted by the adoption of the Core Strategy. All planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

8.3.2 The Core Strategy replaces the UDP and incorporates the Site Proposal Schedules and Proposals Map including mapping changes. Remaining UDP site proposals that have not been superseded or amended as a specific result of the Core Strategy remain part of the Royal Greenwich Local Plan, until superseded, amended or deleted through the Royal Greenwich Local Plan: Site Allocations document, which is expected to be consulted on by the end of 2015, on the issues and options.

8.3.3 The main Core Strategy policies relevant to this application are:

Housing

H1 New Housing
H2 Housing mix
H3 Affordable Housing
H5 Housing Design
H(e) Children’s Play Areas

Economic Activity and Employment

EA1 Economic Development
EA5 Tourism
EA(c) Skills and Training

Town Centres

TC5 North Greenwich District Centre
TC(a) Primary, Secondary and Local Shopping Frontages
TC(c) Hot Food Take-aways

Design and Heritage

DH1 Design
DH2 Tall Buildings
DH3 Heritage Assets
DH(b) Protection of Amenity for Adjacent Occupiers
DH(g) Local Views
DH(i) Statutory Listed Buildings
DH(j)  Locally Listed Buildings
DH(k)  Thames Policy Area
DH(m)  Archaeology

Open Space
OS1   Open Space
OS4   Biodiversity
OS(c)  Public Open Space Deficiency Areas
OS(f)  Ecological Factors
OS(g)  Green and River Corridors

Environment and Climate Change
E1    Carbon Emissions
E2    Flood Risk
E3    Residual Flood Risk
E(a)  Pollution
E(c)  Air Pollution
E(e)  Contaminated Land
E(f)  Living Roofs and Walls

Cohesive and Healthy Communities
CH1   Cohesive Communities
CH2   Healthy Communities

Infrastructure and Movement
IM1   Infrastructure
IM3   Critical Physical Infrastructure
IM4   Sustainable Travel
IM5   Freight
IM(a) Impact on the Road Network
IM(b) Walking and Cycling
IM(c) Parking Standards
IM(d) London City Airport

8.4  Supplementary Planning Guidance / Documents

8.4.1 Mayor of London Housing SPG (November 2012) - The purpose of this document is to supplement the housing policies in the 2011 London Plan (LP).
Part 2 of the SPG sets out the housing standards which reflect LP policy 3.4 and 3.5 and Chapter 7 of the LP. As most of the plans housing standards are already LP policy, this SPG brings them together in an easy to use format.

8.4.2 Sustainable Design and Construction – The London Plan Supplementary Planning Guidance (April 2014) - This guidance document sets out various standards that should be applied to all new developments, along with a second tier of the Mayor’s ‘preferred’ standards. The essential standards are based on current Building Regulations, the targets set out in the Mayor’s strategies and current good industry practice. The Mayor’s preferred standards indicate approaches that can be followed but which are not policy requirements.

8.4.3 Mayor of London Economic Development Strategy (May 2010) - The Economic Development Strategy sets out the Mayor’s ambitions for London. It includes a number of objectives of particular relevance are (1) to promote London as the world capital of business, the world’s top international visitor destination, and the world’s leading international centre of learning and creativity; and, (2) to ensure that London has the most competitive business environment in the world.

8.4.4 Mayor of London – Shaping Neighbourhoods: Character and Context SPG (June 2014) - This guidance sets out an approach and process to help understand the character and context of a place so that its results can inform the planning and design process, and guide change in way which is responsive to individual places and locations. The SPG aims to provide guidance for developers and their consultants in preparing planning applications, so that an understanding of character can help achieve the right development in the right place.

8.4.5 Mayor of London – Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012) - The guidance supports the implementation of the London Plan Policy 3.6 on ‘Children and Young People’s Play and Informal Recreation Facilities,’ and other policies on shaping neighbourhoods (Chapter 7 of the London Plan), in particular Policy 7.1 on Lifetime Neighbourhoods. Of particular relevance, it provides benchmark standards on play requirements that can be used as a reference to guide boroughs in the development of their own local standards and to secure places to play in existing and new housing developments; and provides updated child yield figures for boroughs and developers to assess child occupancy and play space requirements.

8.4.6 Accessible London: Achieving an Inclusive Environment SPG (October 2014) - This SPG provides guidance on the implementation of London Plan Policies
7.1 and 7.2, implementing inclusive design principles effectively, and on creating an accessible environment in London, with particular emphasis on the access needs of disabled and older people.

8.4.7 London View Management Framework SPG (March 2012) - The London View Management Framework is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.

8.4.8 Guidance on Tall Buildings (CABE and English Heritage) – 2007 - This acknowledges that cities and their skylines evolve. In the right place, tall buildings can make positive contributions to city life. They can be excellent works of architecture in their own right; some of the best post-war examples are now listed buildings. Individually, or in groups, they affect the image and identity of a city as a whole. In the right place they can serve as beacons of regeneration, and stimulate further investment. A draft of a revised version of this guidance was issued in October 2014. This is similar to the above and adds that Outline applications are only likely to be justified in exceptional cases where the principle of a tall building is to be established as an important element within a robust and credible masterplan to be developed over a long period of time. If an outline application is sought in these circumstances it is important to ensure that the parameters for development are derived from a thorough urban design analysis to demonstrate impact.

8.4.9 Royal Borough of Greenwich Planning Obligations SPG (February 2008) - The SPD provides guidance about how the delivery of infrastructure, facilities, amenities and other benefits to support and serve new developments and offset any planning loss to the area that would be caused by new development, while ensuring that new development meets the objectives of sustainable development and mitigate the impact of development on the wider environment or by securing additional and appropriate forms of provision. It covers direct provision of facilities and other obligations to be met by the application and, where appropriate, the financial contributions that will be sought.

9. Considerations

9.1 The application is considered in relation to the national and local planning policies referred to in the preceding section of the report, and in relation to the representations received as a result of the consultation process.
9.2 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the application.

9.3 The planning application has been accompanied by an Environmental Statement (ES). The ES assesses the environmental effects that are likely to arise from the development and mitigation measures in accordance with the Environmental Impact Assessment Regulations 2011. A non-technical summary of the ES also accompanies the application.

9.4 The ES provides a full account of the development proposed in the planning application and the likely significant effects on the environment including measures to mitigate any environmental effects.

9.5 The ES has been assessed and consulted upon. It is considered to contain sufficient environmental information to enable determination of the planning application.

9.6 As the application is submitted in outline form, all detailed matters relating to layout, scale, appearance, access and landscaping are reserved for future consideration. The application proposes that development on the site will be controlled by the Development Specification, which builds upon the detail provided on the Parameter Plans, and by the Design Guidelines that seek to establish the key principles to ensure design quality. The Parameter Plans, Development Specification and Design Guidelines are for formal approval and will fix the land use, maximum quantum, maximum building heights, access and circulation routes, and areas of public realm for the 2015 Masterplan.

9.7 To assist in with the assessment of the likely environment impacts, an Illustrative Scheme has been developed. This is a worked example of how a development that complies with the maximum quantum of floorspace being applied for may emerge from the Parameter Plans, Design Guidelines and the Development Specification. The considerations set out below are based on the parameters set within these documents, taking into account how the Illustrative Scheme demonstrates that a development can be delivered in compliance with policy.

10. Principle of the Development /Land Use

10.1 The application proposes a mixed use development of up to 12,678 residential dwellings, up to 220 serviced apartments, up to 23,475sqm of retail and food and drink uses, up to 59,744sqm of business uses, up to 500 hotel rooms; up to 37,900sqm of education floorspace, up to 1,462sqm for health care facilities
; up to 19,526sqm for a visitor attraction, up to 38,693sqm for film and media studios; residential and non-residential car parking, as well as a minimum of 2000 AEG parking spaces proposed for the 2015 Greenwich Peninsula Masterplan.

10.2 The site is part of the area that has outline consent for the 2004 Greenwich Peninsula Masterplan. The 2004 Masterplan provides for a mixed use development, including 10,010 dwellings, 343,600sqm of offices, research and development and light industry, 60,000sqm of hotel, 33,750 retail and food and drink, 3,650sqm of student accommodation and up to 29,900sqm of special needs accommodation, in addition to a site for a new secondary school and open space provision.

10.3 Since the approval of the 2004 Masterplan, there has been greater policy support to increase the supply of housing both nationally and, significantly, in London. The latest version of the London Plan, adopted in 2015 incorporates alterations to primarily address key housing and employment issues emerging from an analysis of census data released since July 2012, which indicate a substantial increase in the capital’s population and an acute housing shortage. In order to address this shortage, without a comprehensive review of the Greenbelt around London, the Mayor is seeking to ensure that the housing output of opportunity and intensification areas is optimised (Policy 2.13 and Paragraphs 2.60 to 2.62). In addition, as explained in section 18.2 below, there has been very low uptake of the permitted office space at the Peninsula. As a consequence it is considered appropriate that the 2004 Masterplan is reviewed.

10.4 The proposals seek to revisit the 2004 Masterplan consent and come forward with a new outline Masterplan application that would significantly increase the total number of residential units to be delivered as part of the mixed-use regeneration of the peninsula to approximately 15,720 units. This is in addition to an overall increase in public open space provision, the introduction of a film studio, a new visitor attraction, office use, community use and a new transport hub.

10.5 The NPPF seeks to ensure that the Green Belt is protected and urban sprawl is prevented. Therefore National Planning Policy advocates the redevelopment and reuse of brownfield sites and seeks to ensure that the potential of sites to accommodate new development is optimised.

10.6 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 11, Greenwich Peninsula, and identifies this area as an internationally significant
leisure attraction capable of delivering a minimum of 13,500 new homes and 7,000 jobs. Annex 2, table A2.2 also identifies North Greenwich as having potential for District Town Centre status subject to capacity analysis, impact assessments, land use and accessibility, planning approvals, town centre health checks and full implementation.

10.7 The London Plan confirms that in these areas, growth will be proactively encouraged. Development proposals in Opportunity Areas should optimise residential and non-residential output and densities and provide necessary social and other infrastructure to sustain growth and, where appropriate, contain a mix of uses’. Greenwich Peninsula is also identified on Map 2.5 as a Regeneration Area.

10.8 The Site is subject to the following designations and saved Site Proposal Schedules on the proposals map in terms of the Council’s Core Strategy:

- The site is located within the Greenwich Peninsula Strategic Development Location which is identified to deliver around 14,000 new homes. The site is affected by several saved Site Proposal Schedules on the proposals map.

- Proposed Plots 1, 2, 3, 4 and 5 are located within Site Proposals Schedule Mu21 which is allocated for residential-led mixed use development with ancillary local services.

- Proposed Plots 6, 7, 8, 9, 10, 11, 12, 13 and 14 are located within Site Proposals Schedule Mu20. This Site Proposal Schedule is allocated for business / commercial uses and a balanced and appropriately scaled mix of retail, leisure and other uses.

- Proposed Plots 15, 16, 17 and 18 are located within Site Proposals Schedule Mu22. This Site Proposal Schedule is allocated for residential-led mixed use development including a school and ancillary local services.

- Proposed Plots 19 and 20 are located within Site Proposals Schedule Mu23 and M12. Site Proposals Schedules Mu20 and M12 are allocated for predominantly residential on the eastern waterfront and the riverside walk and Thames cycle route.

10.9 The above Site Proposals Schedules were based on the land uses established for these areas in terms of the 2004 Masterplan outline consent. Parts of the
outline consent were revised in terms of the CCAM and the PQ Masterplan (please refer to section 4 for more detail).

10.10 The disposition and quantum of land uses across the site has been somewhat altered for the 2015 Masterplan when compared to the 2004 Masterplan and the Site Schedules listed above, including the introduction of new film studio and visitor attraction uses.

10.11 Given that the existing 2004 Masterplan consent has established the principle of the proposed mix of land uses (with the exception of the film studio and visitor attraction) and the Peninsula’s Opportunity Area status within the London Plan, it is considered that the principle of the large scale mixed-use redevelopment of Greenwich Peninsula that would deliver a significant number of homes and jobs is supported.

11. **Housing**

11.1 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 11, Greenwich Peninsula, and identifies this area as an internationally significant leisure attraction capable of delivering a minimum of 13,500 new homes.

11.2 London Plan Policy 3.7 encourages proposals for large residential developments in areas with good public transport accessibility. Those on sites of over five hectares or capable of accommodating more than 500 dwellings should be progressed through an appropriately plan-led process to encourage higher densities and coordinate where necessary provision of social, environmental and other infrastructure and create neighbourhoods with a distinctive character, sense of local pride and civic identity in line with the Design policies in Chapter 7 of the London Plan. The planning of these areas should take place with the engagement of local communities and other stakeholders. They should make a significant contribution towards addressing local housing needs and help to bring forward a critical mass of development that is required to support social, economic and environmental infrastructure. The aim is to create successful communities where people will choose to live and work in the future.

11.3 The Council’s Core Strategy (July 2014) seeks to ensure that development and growth is concentrated within the designated Strategic Development Locations, one of which is Greenwich Peninsula. Paragraph 3.3.18 states that this area will provide a significant proportion of Royal Greenwich’s new housing.
11.4 The proposed development will deliver up to 12,678 residential units and up to 200 serviced apartments. The residential units on the Peninsula currently built, being constructed or are to be implemented in the 2004 Masterplan area equates to 2,822. Therefore the 2015 Masterplan proposes that up to 15,700 units could be delivered in total on the Peninsula as a whole. This represents an increase of 5,890 residential units.

11.5 Paragraph 3.43 of the London Plan states that large residential developments should take account of:

- the relationships between the pattern and scale of development and movement within the site, with adjacent areas and connections with the wider transport network;
- other linkages with neighbouring areas so that the new development is designed to be firmly embedded within the wider community;
- social infrastructure provision;
- opportunities for decentralised energy generation and provision, sustainable design and construction and coordinated neighbourhood management, especially in securing and maintaining a high quality public realm, safety measures, planting and open space and play provision.

11.6 It is considered that the Design and Access Statement that accompanies the application, as well as the proposed Design Guidelines which will inform the Zonal Masterplan and Reserved Matters applications demonstrate that the 2015 Masterplan will take account of the context of adjacent areas. In addition, the Masterplan includes the creation of a major transport interchange, including reconfiguration and enlargement of the existing bus station and streamlining of the bus routes, as well as the creation of an enhanced pedestrian and cycling network.

11.7 The 2015 Masterplan makes provision for the following social infrastructure to support the development contributing to the social infrastructure required for the additional units on the Peninsula:

- A new through school
- An extension to Higher Education (Ravensbourne College)
- A new primary school including nursery facilities
- Healthcare facilities
- New children’s play spaces to take account of the requirements generated by the increase in residential units
- A 5km running track
- Community Space including prayer space
• A range of D1/D2 class uses, which would enable smaller, more local facilities to be provided within the development such as crèches, community space and cultural uses.

11.8 An Energy Strategy and Sustainability Assessment has been submitted in support of the planning application. An important component of the energy strategy is the proposed Greenwich Peninsula Low Carbon Energy Centre (LCEC) which is located on the ‘Gateway Site’, just outside of the 2015 Masterplan area. The Sustainability Strategy demonstrates how the proposed development will achieve various sustainability objectives. It is proposed to include various conditions and S106 obligations regarding management of the communal areas in the development and links to the wider community.

11.9 Given the minimum housing target of 13,500 set out within the Opportunity Area guidance in the London Plan and the recognition of the Peninsula’s strategic role as a major contributor towards meeting London’s and the Royal Borough’s need for additional housing, it is considered that the proposed increase in residential development would greatly assist to deliver this objective.

12 Affordable Housing

12.1 Policy 3.11 and Policy 3.12 in the London Plan state that the maximum reasonable amount of affordable housing provision should be sought when negotiating on individual private residential and mixed use-schemes. It also states that targets should be applied flexibly, taking into account site costs, the availability of public subsidy and other scheme requirements.

12.2 Policy 3.12 states that negotiations on sites should take account of viability of schemes prior to implementation and other scheme requirements. It also states that affordable housing should normally be provided on site, unless exceptional circumstances can be demonstrated.

12.3 Policy H3 (Affordable Housing) of the Core Strategy states that ‘Developments of 10 or more homes or residential sites of 0.5 hectare or more will be required to provide at least 35% affordable housing. The precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and of the development, including financial viability’. The affordable housing that is provided should be provided as 70% social/affordable rented and 30% intermediate housing.
12.4 The application proposes that within the 2015 Masterplan area, a minimum of 2,928 affordable housing units will be provided. This would represent 22.7% of the maximum 12,898 residential units (i.e. 12,678 residential units plus 220 serviced apartments) to be delivered on the site.

12.5 This will be in addition to a total of 2,822 homes that have been or are currently being delivered on the wider Peninsula Masterplan site as represented in the 2004 consent. Of these 1,002 will be affordable homes. Therefore, across the wider site a total of 15,720 homes will be built of which of which 3,930 (i.e. 2,928 + 1,002) or 25% will be affordable.

12.6 The applicant has agreed to a review mechanism to allow for additional affordable housing to be delivered. In terms of the Review Mechanism, a maximum of 1,586 additional affordable units could be provided resulting in a total of 4,514 (35%) in the 2015 Masterplan site area which would meet the current policy requirement.

12.7 The affordable housing units will be provided as 70% social rented units – at target rents and 30% as intermediate units. Recent experience of the delivery of shared ownership units (which is a type of intermediate housing) in the Borough has shown that these are becoming less and less affordable due to ongoing increases in house prices, particularly in respect of 3 bedroom units. Therefore it is proposed that the intermediate tenure units could be brought forward in an alternative form(s) to shared ownership such as intermediate rent. If shared ownership is pursued there will not be any three bedroomed units. In order to address concerns regarding the level of service charges for affordable housing a S106 obligation will be secured requiring collaboration between the developer, Registered Providers and the Council to ensure that these are kept to a minimum. The proposed 70:30 tenure mix is considered to be acceptable and in accordance with the relevant policies.

12.8 As the application is in outline form, the exact disposition of the affordable housing across the site has not been determined yet. However, the applicant has confirmed that there will be affordable housing in each residential neighbourhood with the caveat that no affordable housing will be provided on Plots 1.01, 1.02, 1.03, 2.01, 2.02 and 2.03 in the Meridian Quays Neighbourhood. This reflects the arrangement previously consented in 2013 for the 11 Plot Peninsula Quays 2013 Masterplan and 11 Plot Agreement.

12.9 The 11 Plot Agreement allowed for no affordable housing to be required on this part of the site on the basis that the delivery of 646 affordable homes to be provided across 7 of those 11 plots, (MO101, MO103, MO104, MO114, MO115, MO116, MO117) would be accelerated. The schemes delivering this
affordable housing have since been granted consent by the Council and are currently being delivered. Therefore, as the agreed amount of affordable housing is being delivered, it is considered, on balance, that the proposal to retain the principle that no affordable housing will be provided on Plots 1.01, 1.02, 1.03, 2.01, 2.02 and 2.03 in the Meridian Gardens neighbourhood is acceptable.

12.10 It must be stressed that this is an exceptional circumstance and this on balance conclusion should not be taken as an indication that future proposals for large quarters of the other neighbourhoods in the Masterplan or elsewhere in the Borough to contain no affordable housing will be acceptable. The Council is committed to securing the delivery of affordable housing in the Borough within mixed and balanced communities.

12.11 To ensure that the affordable housing is delivered at a steady rate as the development progresses, the applicant is proposing to set minimum percentages of affordable housing to be delivered in each residential neighbourhood. The S106 Agreement will secure an obligation that a table will be issued listing the total number of residential units to be provided in each neighbourhood, the envisaged total affordable units to be provided in each neighbourhood and the minimum number of affordable units to be provided in each neighbourhood. This table will set out the guaranteed minimum affordable housing for each neighbourhood as well as current indicative totals for each neighbourhood. The table will be reviewed and updated as the development progresses with any changes being subject to Council approval so that the Council is aware of the running tally of units provided. The Council will have the ability secured through the S106 agreement to prevent future occupation of residential units should it not be content with any revisions proposed to the table. The current proposed table showing guaranteed minimums of affordable housing in each neighbourhood is as follows:

<table>
<thead>
<tr>
<th>Neighbourhood</th>
<th>Total Homes</th>
<th>Min Affordable</th>
<th>Min % Affordable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brickfields North</td>
<td>1,152</td>
<td>230</td>
<td>20%</td>
</tr>
<tr>
<td>Brickfields South</td>
<td>1,608</td>
<td>400</td>
<td>25%</td>
</tr>
<tr>
<td>Lower Riverside</td>
<td>2,607</td>
<td>520</td>
<td>20%</td>
</tr>
<tr>
<td>Meridian Quays</td>
<td>5,851</td>
<td>850</td>
<td>15%</td>
</tr>
<tr>
<td>Peninsula Central</td>
<td>1,680</td>
<td>335</td>
<td>20%</td>
</tr>
<tr>
<td><strong>Sub Total</strong></td>
<td><strong>12,898</strong></td>
<td><strong>2,335</strong></td>
<td><strong>18.1%</strong></td>
</tr>
<tr>
<td><strong>Balance to be distributed</strong></td>
<td><strong>-</strong></td>
<td><strong>593</strong></td>
<td><strong>4.6%</strong></td>
</tr>
</tbody>
</table>
12.12 There is an expectation that the balance of affordable homes to be distributed will be distributed across the scheme. The applicant has reflected this aspiration in the following indicative table;

<table>
<thead>
<tr>
<th>Neighbourhood</th>
<th>Total Homes</th>
<th>Affordable</th>
<th>% Affordable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brickfields North</td>
<td>1,152</td>
<td>270</td>
<td>23%</td>
</tr>
<tr>
<td>Brickfields South</td>
<td>1,608</td>
<td>447</td>
<td>28%</td>
</tr>
<tr>
<td>Lower Riverside</td>
<td>2,607</td>
<td>607</td>
<td>23%</td>
</tr>
<tr>
<td>Meridian Quays</td>
<td>5,851</td>
<td>1,203</td>
<td>21%</td>
</tr>
<tr>
<td>Peninsula Central</td>
<td>1,680</td>
<td>401</td>
<td>24%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>12,898</strong></td>
<td><strong>2,928</strong></td>
<td><strong>22.7%</strong></td>
</tr>
</tbody>
</table>

12.13 The 2004 Masterplan proposed that 38% of the 10,010 residential units would be affordable which equated to 3,803 units. This was dependent on the availability of affordable housing grant. If there is no affordable housing grant available the level of affordable housing would fall to approximately 20%.

12.14 Affordable Housing grant has been significantly reduced since 2012 and is no longer available for individual developments schemes. Rather it is paid direct to Registered Providers of affordable housing to use across their respective programmes. On this basis it has to be assumed that there will be no affordable housing grant going into the proposed development. Therefore the current guaranteed offer of affordable housing is based on no affordable housing grant.

12.15 A viability assessment in support of this offer has been produced by BNP Paribas on behalf of the applicant, which has been examined in detail by an independent assessor who has advised that “The key base values and costs in this case are all justifiable and not contentious. They have been thoroughly researched and are supported, at least at today’s values and costs. He goes on to acknowledge, however, that the issues are all about Future Net Capital Growth, rather than today’s situation.”

12.16 In assessing the applicant’s affordable housing offer the Assessor has identified and discussed the influential factors as follows:

Historic Agreements
12.17 “The simple fact remains that this proposal has been and always was driven by its legacy. Its history via various agencies including English Partnerships, the HCA, the Treasury, TFL and ultimately the GLA, has inevitably meant that some agency, or several, will receive significant sums via the original land agreement, and currently, none, it would appear, are prepared to re-cycle any share of those receipts back into affordable housing in Greenwich. That is a key driver in this case. Before February 2014, when Government largely abandoned grant aid to affordable housing, we would have expected most schemes to have exceeded 30% affordable housing. Without grant, that expectation has now been reduced by about one third.”

Infrastructure Costs

12.18 “A second key driver in this case is infrastructure costs. Historically, there was considerable expenditure on clearing and decontaminating the area but much of this was superficial. The revised proposals involve substantive costs and these are complicated by the need for existing parking areas for example, to be replaced in order to release those areas, together with a new public transport interchange and other requirements, all of which are pre-requisites to development phases, and thus a major factor in determining cash flow. Put simply, the financial effect of heavy up-front infrastructure investment, is to defer a positive return for some years, and thus increase the risk associated with the scheme.”

Value versus Cost inflation - Current Deficit

12.19 “We have examined in great detail the evidence submitted by the applicants and their advisors and accept the broad premise, namely that the proposals, even on the much expanded basis, remain in the medium term, in deficit, and that that deficit is in excess of £1bn. The key therefore is the ability of the proposals to not only ‘make a market’, that is deliver a ‘place’ in North Greenwich which generates a ‘new’ market more akin to Canary Wharf in value terms, but to do so taking account of build cost inflation over what is a very protracted build period. This is clearly a very high risk strategy.”

Affordable Housing

12.20 “Nevertheless, despite the risk involved, the applicants have committed to deliver a guaranteed 25% affordable housing element in the overall scheme, albeit this element contains 22.7%. Despite earlier contributions, the current revised Masterplan assumes a no grant regime and as noted above, there is no doubt in our view that this approach exacerbates developer risk.”

Conclusion
12.21 “The result therefore and what has been the subject of intense discussion between Council officers, ourselves and the applicants, focusses on risk, and in particular, what is the likelihood of the scheme being delivered as presented, and further, what expectation is there that the guaranteed overall 25% affordable housing element (22.7% in the current application) can be increased via Review mechanisms in the Planning Agreement, which the applicants are committed to?”

12.22 “In response, it has to be emphasised that both the applicants and ourselves are inevitably speculating, not only regarding the extended length of the project but also the potential for a wide range of possible changes in the future to delivering major projects and affordable housing. As such, in line with standard development appraisal conventions, all parties have accepted that we can only model future potential based on current costs and values as a benchmark and then extrapolate accordingly. Council officers and we have required the applicants and BNP Paribas to consider those possibilities which they have done. Their [BNP Paribas] summary of potential is attached to this letter and concludes as follows:

“Our analysis indicates that should sales prices increase with those achieved at Woolwich Arsenal, the proposed development at the Greenwich Peninsula may be in an economically viable position to provide additional affordable housing half way through the proposed development period of 20 years. This is as a result of our analysis showing that should 5% net growth be achieved the current deficit existing within the proposed scheme will be cleared and an IRR of 19.77% may be achieved by year 10. Should a net increase exceed the Woolwich Arsenal development, additional affordable housing could potentially be provided within the first 10 years of the development period.” (Independent Assessor’s own emphasis in bold)

12.23 “As officers are aware, we have debated this assessment at length with the applicants and it is our professional opinion, that there is a strong likelihood that the BNParibas conclusion will be achieved, in which case, the Peninsula proposals, without further grant or GLA financial support, will exceed the applicants guarantee of 25% affordable housing. Since apart from Registered Provider sites, that would be unusual in London, we are obliged to support the submission.”

12.24 It has been verified by the Independent Assessor that the scheme is currently unviable, even without any affordable housing at all. The applicant has agreed to a review mechanism to allow for additional affordable housing to be delivered should there be a minimum acceptable uplift in the value of the scheme. The requirement for ongoing updated tables to be submitted will
allow the Council to ensure it is content with the ongoing disposition of affordablen housing across the Masterplan. Therefore in the light of prevailing policy considerations and guidance, it is considered that the proposed affordable housing offer is acceptable.

13  **Residential Mix**

13.1 London Plan Policy 3.8 states that new development should ensure a range of housing choice in terms of the mix of housing sizes and types.

13.2 Policy H2 (Housing Mix) of the Core Strategy states that ‘A mix of housing types and sizes will be required in all developments and should contain a proportion of 3, 4 and 4+ bedroom units. The exact mix on each site will vary according to the location of the development and the character of the surrounding area and will be affected by factors such as; the need to protect small and medium sized family dwellings from sub-division and conversion, the level of accessibility to public transport, schemes for special needs groups, or where there is a poor external environment’. Table 8 of the Core Strategy shows that the housing need in Royal Greenwich is for 51.2% three or more bedroome units.

13.3 The proposed mix of units in the 2015 Masterplan will include studios, 1, 2, 3 + bedroom units within the following ranges:

- Studio – range 0-20% (maximum of 15% overall)
- 1-bed – range 25-50%
- 2-bed – range 20-40%
- 3bed+ - range 5-30% (minimum of 20% overall)

13.4 Ranges are proposed due the size of the site and scale of development that will mean that the mix within different parts of the site will vary in accordance with the neighbourhood characteristics. For example, in the area closer to the O2 and the transport hub, there would be higher density development which would be more appropriate for 1 and 2 bedroom units. However, in the area to the south west, close to the Park and the proposed school, there would be lower density development which would be suitable as a more ‘family zone’.

13.5 The 2004 Masterplan S106 Agreement set out the required mix of units for the affordable housing for the Peninsula. Details of the mix for the market units were submitted for approval in terms of Condition 67 of the 2004
outline consent. Overall the proportion of three or more bedroom units to be provided on the 2004 Masterplan site equates to between 15 – 21.4% and 15.5% or more for the affordable units.

13.6 The range proposed for three or more bedroom units in the 2015 Masterplan is much wider than the range approved for the 2004 Masterplan. As stated above, this is to take account of the different characteristics of the site. The 2004 Masterplan did not include residential uses as close to the transport interchange and the O2 as what is being proposed now and therefore the range is considered to be appropriate.

13.7 Given that the upper end of the range is now 30% the proposed overall minimum amount of 20% three or more bedroom units across the 2015 Masterplan is considered to remain in accordance with the 2004 Masterplan. The amount proposed is also considered to meet the requirements of the London Plan and Core Strategy policies, given the overall characteristics of the site. It will contribute to the creation of a mixed, balanced and sustainable community on the Peninsula.

14 Residential Density

14.1 Paragraph 4.1.39 of the Core Strategy states that ‘when considering proposals for housing developments the Council will give priority to securing a high quality environment for residents and making the best sustainable use of land, having regard to the location of the site, to the individual characteristics of the site and the character of the surrounding area. The Council will utilise the London Plan Policy 3.4 to guide rates for housing density in applying local context to the settings defined in the London Plan’.

14.2 Policy 3.4 in the London Plan seeks to ensure that the housing potential of sites is optimised and states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Density ranges. Table 3.2 takes into account location, existing building form, massing and Public Transport Accessibility (PTAL). The PTAL rating is used as a means of quantifying and comparing the accessibility of public transport for a site.

14.3 Based on the character of the development approved in terms of the 2004 Masterplan and location of the site, using the descriptions that accompany Table 3.2 of the London Plan, it is considered that the sites of both the 2015 Masterplan and the wider 2004 Masterplan would best fall into the ‘central’ setting. These are described as “areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six
storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre."

14.4 The site’s PTAL currently varies from 1 to 3 in the south to between 5 and 6 in the north (on a scale where 1 is poor and 6 is excellent). The PTAL measure reflects:

• Walking time from the point-of-interest to the public transport access points;
• The reliability of the service modes available;
• The number of services available within the catchment; and
• The level of service at the public transport access points - i.e. average waiting time.

14.5 As a result of the proposed footbridge linking the north western end of the site to the new Transport Hub and improvements to the permeability of the walking environment across the site generally that would result from the new Masterplan, it is considered that there would be improvements to the accessibility of the public transport network and therefore to the PTAL levels for the site.

14.6 The net density for the development has been calculated using an area which excludes open spaces and the parts of the site being developed with non-residential uses only. Using this method, the overall density of the development on the 2015 Masterplan site would be 424 dwelling units per hectare (u/ha) for 12,898 residential units and serviced apartments on a net site area of 303,527 sq.m.

14.7 The density for the extant permission on the 2004 Masterplan using this same method of calculating the net site area would be 258 u/ha for 10,010 residential units on a net site area of 387,439 sq.m. With the additional 5,690 units being proposed in the 2015 Masterplan, this density would increase to 406 u/ha for 15,720 units in the 2004 Masterplan site area.

14.8 In terms of Table 3.2 of the London Plan, the appropriate density ranges for the different PTAL levels for this site would be:
- 50 - 110 u/ha for a PTAL of 1
- 100 - 240 u/ha for a PTAL of 2 to 3
- 215 – 405 u/ha for a PTAL of 4 to 6

14.9 It is acknowledged that the density on the site will exceed the density guideline in the London Plan, however PTAL alone is not an appropriate measurement to inform residential density. The London Plan and Housing
SPG also recognise that there is scope to exceed these density guidelines in exceptional circumstances having regard to other factors such as local context, design, transport capacity, social infrastructure and amenities such as open space and play space. It is considered that the applicant has demonstrated this, as summarised in the following

- The site is located in an Opportunity Area in the London Plan and a Strategic Development Location in the Core Strategy which seek to optimise residential and non-residential output and densities.
- The 2015 Masterplan will deliver key new infrastructure including an enhanced transport interchange including a new bus station, with increased capacity and improved operation and a new station concourse building with significantly increased circulation space; the realignment of West Parkside, to provide a more direct connection with the new bus interchange; a new pedestrian bridge over the Blackwall Tunnel Approach Road, providing increased public transport accessibility to the west side of the Site.
- The scheme provides a sustainable mix of dwelling types with a satisfactory presence of family units for this location. It includes a range of studio, 1 bed, 2 bed, and 3 bed units. A minimum of 20% of 3 bed and larger units is proposed.
- The Design and Access Statement has demonstrated how the development would meet the good practice standards set out in the Mayor’s Housing SPG. It is considered that the proposed Design Guidelines will secure a high quality of design and a high quality living environment for future residents.
- The development will have access to a hierarchy of open space including a new public open space, on-site play facilities for young children and access to private amenity space for residents as well as good access to supporting local facilities including new retail and community facilities and improved pedestrian and cycle connectivity.
- The 2015 Masterplan proposes the following social infrastructure to support the development: a new All Through school; an extension to Higher Education (Ravensbourne College); a new primary school including nursery facilities; new healthcare facilities; ancillary local community facilities.

14.10 In this context, it is also relevant to note that the Peninsula is within an Opportunity Area where residential output and density should be optimised. The approach in the Further Alterations to the London Plan is that: “...the scope for larger areas to determine their own character should be fully realised in terms of housing densities, including those towards the top of the relevant
density scale where appropriate. The Housing SPG provides guidance where these ranges may be exceeded in justified, exceptional circumstances.” (paragraph 2.62).

14.11 It is considered that given that the Peninsula has very good transport links, extensive riverside frontages, significant areas of public realm, and the scope to provide the social infrastructure to meet fully the needs of the new community, there is scope to establish its own character and hence resultant density without giving rise to any undue impact on the wider local area.

14.12 In recognition of the varying PTAL levels across the site and the predicted improvements to the PTAL levels as a result of the proposed development, the applicant’s proposed dispersal of the residential units across the site has been formulated to concentrate the higher density areas in the neighbourhoods with higher PTAL ratings. It is considered that these densities are appropriate for the individual characteristics of these neighbourhoods. The following net densities are proposed for the five residential neighbourhoods:

- Meridian Quays: A density 507 u/ha is proposed. This part of the site has a good PTAL rating. The density also recognises the extensive river frontage, the relationship to Canary Wharf and the proposed provision of new parks and pedestrian links to the east.

- Peninsula Central: A density of 299 u/ha is proposed. This part of the site has an excellent PTAL rating and will deliver the new transport interchange.

- Lower Riverside: A density of 320 u/ha is proposed. This part of the site has a very good to good PTAL rating. It also has frontage onto the River Thames to the east as well as Central Park to the west.

- Brickfields North: A density of 300 u/ha is proposed. It also has extensive frontage to Central Park and good links to the transport interchange.

- Brickfields South: A density of 218 u/ha is proposed. This part of the site has a good to moderate PTAL rating. This lower density reflects the aspiration for a more family oriented neighbourhood and the inclusion of the all-through school.

14.13 It is considered that the overall density and approach to density for the different neighbourhoods is acceptable and complies with the London Plan and Core Strategy density policies which aim to optimise housing output.
15 Residential Design Standards, Lifetime Homes and Wheelchair Units

15.1 Core Strategy policy H5 seeks a high quality of housing design that is, among other things, consistent with the Mayor of London’s Housing SPG, provides appropriate private amenity space, has regard to safety and security, allows for direct access to private gardens for families, adheres to Lifetime Homes standards and provides an appropriate amount of wheelchair dwellings. London Plan policy 3.5 considers that housing development should be of the highest standard internally and externally and in relation to their context and to the wider environment.

15.2 To ensure that policy H5 (ix) is complied with a condition requiring at least 10% of the Social Rented units to be built to full wheelchair standards in accordance with Greenwich Wheelchair Site Brief (Updated October 2012) and 10% of all other units to be capable of adaption to wheelchair units in accordance with the requirements of the London Plan will be imposed on any grant of Planning Permission.

15.3 The 2015 Masterplan is submitted as an outline planning application with detailed matters to be reserved. However, the Design and Access Statement includes typical building ‘typologies’ for each neighbourhood demonstrating how, at the detailed design stage, the proposed 2015 Masterplan would meet the good practice standards set out in the Housing SPG.

15.4 In addition, the Design Guidelines have been submitted for approval which are to inform the Zonal Masterplans and Reserved Matters applications. These provide details on a number of overarching urban design principles including neighbourhoods, open space and landscape, movement and street grain, building form (including sunlight and daylight and wind) and local and long views. The Design Guidelines have recently been amended to include that the design of residential development will take into consideration the relevant residential quality guidance as set out in Royal Borough of Greenwich and London Housing Design Guidance.

16 Residential Amenity Space

16.1 Policy H5 of the Core Strategy states that ‘in new residential schemes and conversions, developers will be expected to provide sufficient amenity spaces to meet the needs of residents. Family housing should normally have direct access to a private garden. In flats a terrace, good sized balcony or enclosed communal garden (not accessible to the general public) should be provided.’ Policy H5 of the Core
Strategy states that dwellings intended for families should have direct access to a private garden.

16.2 In the London Plan Housing SPD, Standard 4.10. (baseline requirement) states that a minimum of private 5sqm of private outdoor space should be provided for 1-2 person dwellings.

16.3 It is proposed that the majority of the units would have access to private amenity space in the form of either a private garden at ground floor level or a balcony at upper levels. In addition, all residents within the development would have access to shared amenity space in addition to other nearby public open spaces in the form of Central Park, Meridian Quays, Peninsula Square and the River Thames.

17. Retail Floorspace

17.1 National policy in relation to retail developments is set out in paragraphs 23 to 27 of the NPPF.

Paragraph 24 notes inter alia that local planning authorities:
“should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.”

17.2 Annex 2, table A2.2 of the London Plan identifies North Greenwich as having potential for District Town Centre status subject to capacity analysis, impact assessments, land use and accessibility, planning approvals, town centre health checks and full implementation. Paragraph A2.1 of the London Plan defines District Centres as:
“…providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000-50,000 sq.m of retail, leisure and service floorspace.”

17.3 Core Strategy Policy TC5 provides specific policy for North Greenwich District Centre. Policy TC5 indicates the new leisure-led District Centre will complement The O2 and will perform a specialist role by catering for the entertainment and leisure needs of national and international visitors, as well as providing for workers and residents. In addition to The O2, the District Centre will comprise sports, leisure and retail outlets in the vicinity of The O2.
17.4 The supporting text to Policy TC5 provides further guidance on the scale of retail development that is expected within the proposed North Greenwich District Centre. Paragraph 4.3.35 states: “Retail development in North Greenwich should be of an appropriate size for a District Centre. Total retail floorspace within the Centre should not exceed the typical upper floorspace figure for a District Centre of 50,000 sq.m as set out in the London Plan. The Centre will be focused on leisure based uses to ensure that it does not have a negative impact on the retail function of other town centres in the Borough, particularly Woolwich and Greenwich.”

17.5 The application proposes a total of 23,500 sq.m of retail floorspace of which, 21,600 sq.m is proposed to be provided within the proposed District Centre.

17.6 There is currently 37,275 sq.m of retail floorspace (A1-A5) with outline consent in the O2. Of this, 12,711 sq.m has been built within the O2 Entertainment District and a further 19,677 sq.m could be delivered if the current reserved matters applications, including the designer retail outlet village within the O2, are implemented. This would leave a further 4,887 sq.m of retail that is permitted under the outline consent to come forward. However, it is accepted that this maximum quantum of 37,275 sq.m is unlikely to be delivered due to the flexibility afforded by the permitted ranges in use classes secured by the planning permission for the O2 Entertainment District.

17.7 Existing built and consented A Class floorspace in the area of the proposed District Centre including the above O2 figures and other developments comprises the following:

- The O2 Entertainment District – Built: 12,711 sq.m
- The O2 Entertainment District – Consented: 19,677 sq.m
- Ravensbourne College – Built: 818 sq.m
- Pier Walk and Mitre Passage – Built: 1,045 sq.m
- Peninsula Central East – Consented: 2,194 sq.m
- Total: 36,445 sq.m

17.8 When the above total of 36,445 sq.m is added to the 21,600 sq.m proposed in the District Centre it would result in a total of 58,045 sq.m being provided in the District Centre. This therefore exceeds the typical upper level of 50,000 sq.m floorspace for District Centres identified in the London Plan and Core Strategy. However it is noted that this is a typical upper threshold rather than an absolute figure.

17.9 The application proposals provide a retail and transport hub within the area of the District Centre. The proposed retail uses within this new hub would
complement existing and proposed facilities within the O2 Entertainment District, and will cater primarily for the needs of local residents and workers. The international success of the O2 as a leisure destination remains the focus of this area and is the reason why it has been identified as a potential District Centre. Therefore, although the proposals would result in 8,000 sq.m of floorspace beyond the identified typical threshold it is considered that the focus of this District Centre will remain leisure based, which is in accordance with the Core Strategy aspiration for the area.

17.10 The precise retail mix of units has yet to be decided; however an indicative mix is set out in table 1.1 of the retail statement and is copied below. The mix of units described in this table and the percentage of A1 units to be provided is considered appropriate in that it will complement the existing leisure and entertainment facilities within the O2 rather than compete with them. It is recommended that details of the mix of retail units are to be submitted under a condition once the mix is known for each reserved matters application.

<table>
<thead>
<tr>
<th>Use class</th>
<th>Category</th>
<th>% of total floorspace</th>
<th>Floorspace (sq.m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class A1</td>
<td>Comparison goods</td>
<td>45</td>
<td>10,600</td>
</tr>
<tr>
<td>Class A1</td>
<td>Convenience goods</td>
<td>10</td>
<td>2,350</td>
</tr>
<tr>
<td>Class A1</td>
<td>Non-retail services</td>
<td>10</td>
<td>2,350</td>
</tr>
<tr>
<td>Class A2</td>
<td>Financial/professional services</td>
<td>10</td>
<td>2,350</td>
</tr>
<tr>
<td>Class A3-5</td>
<td>Restaurants/cafes/drinking establishments/hot food takeaways</td>
<td>25</td>
<td>5,850</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>100</td>
<td>23,500</td>
</tr>
<tr>
<td>Class A1</td>
<td>Comparison goods</td>
<td>45</td>
<td>10,600</td>
</tr>
</tbody>
</table>

17.11 A Retail Statement has been submitted with the application to respond and this concludes the following:

- There is significant potential for new comparison goods and food/beverage floorspace within Greenwich Peninsula and the wider catchment area.
- The proposed 2015 Masterplan will make a significant contribution towards accommodating projected expenditure growth that is likely to be generated by development on Greenwich Peninsula and within RBG.
• The impact assessment indicates that the retail (Class A1 to A5) floorspace proposed within the 2015 Masterplan, taken cumulatively with retail commitments, will not have a significant adverse impact on designated town centres or existing/planned investment.

18. Business Use

18.1 In terms of the London Plan Policy 2.13 and Table A1.A of Annexure 1, there is a strategic aspiration for the Peninsula to provide 7,000 jobs within the opportunity area. The Core Strategy identifies that 21,000 jobs are needed for Greenwich as a whole.

18.2 The 2004 Masterplan proposed 343,600 of business floorspace. This is being reduced to 59,744 sq.m in the 2015 Masterplan. The key driver for this has been the low demand for large floorplate office space that is currently consented under the extant Masterplan. Given the significant loss of employment floorspace this represents, the applicant has provided an independent strategic office market report that assesses the impact that the proposed reduction in floorspace would have on current and future demand for office space in London and the future trends in the market. The findings of the review demonstrate that the supply of office floorspace in the capital currently exceeds demand by 84%, but this falls to 42% when the latest employment projections contained in the London Office Floorspace Projections 2014 (LOFP) are considered and therefore in this respect the current market seems well balanced.

18.3 However, the report goes on to highlight that there is currently a potentially large over supply in Greenwich, Newham and Tower Hamlets. The report concludes that in light of this current over-supply in London, the reduction in B1 floorspace as part of the revised masterplan would not have a detrimental impact on supply and demand balances.

18.4 The Council employed independent consultants to review the submitted report who agreed that the office provision in terms of the 2004 Masterplan is indeed too high to be viable. However there was not absolute agreement that the amount currently proposed for the 2015 Masterplan is sufficient. Therefore a S106 obligation is to be secured which will require reviews of the Masterplan as it is being developed to determine if it may be appropriate to increase the overall provision of office space above that currently proposed.

18.5 The success of the Digital Greenwich Hub based in Mitre Passage on Greenwich Peninsula is establishing a new economy based on attracting a
cluster of digital SME’s working in the creative, digital and design fields. Backed by Greenwich’s Digital Accelerator Programme, the peninsula already contains a large number of start-ups and tech businesses and attracts large numbers each year to the growing programme of events and exhibitions.

18.6 Businesses within these sectors - including software publishing, film and TV post-production, media, information, fashion, advertising, graphic design and IT-based operations - are currently experiencing enormously rapid growth rates within the capital. The ongoing regeneration of the peninsula is generating mixed-use district that contains the essential components that are attractive to start up and fast-growth digital businesses. The presence of Ravensbourne College and proximity of Greenwich University provide an academic and research backdrop to business development as well as producing graduates and post-graduates in a wide range of creative and tech-based subject areas.

18.7 As an alternative to the previous large floorplate office space, the strategy of the 2015 Masterplan is to maximise the new opportunities on the Peninsula described above by providing highly flexible floor space suitable for SME’s focussed at the heart of the Masterplan, specifically in the area referred to as the “Design District” in Peninsula Central at the north end of Central Park. It is proposed that the flexibility of the space will suit the needs of established and emerging businesses and promote the organic growth of an established digital and tech business cluster in Greenwich.

18.8 Overall, whilst the need for the reduction in B1 office floorspace is regrettable, the principle of the proposed reduction in office floorspace is considered acceptable as this will not have a detrimental impact on current forecasts for the demand of office floor space in East London or the capital as a whole. In addition the proposals for the office provision in the 2015 Masterplan will complement the Borough’s aspiration and efforts to establish a digital hub on the Peninsula.

19. Film Studios

19.1 A key change in land use compared to the existing masterplan is the provision of a large film studio at the heart of the site. It is envisaged that the proposed new studio spaces will bring major productions to Greenwich, augmenting the borough’s already strong reputation as a location for film and TV. Consequential economic benefits would include significant opportunities for new service companies and pre- and post-production businesses.
19.2 The strategic aspirations of London Plan 4.6 policy support the enhancement of arts, culture, sport and entertainment provision in the capital. It is considered that the film studios will complement the emerging character of Greenwich Peninsula as a leisure and entertainment destination. This use will also contribute to the overall quantum of employment opportunities which is welcomed. The presence of the film studio also provides a significant opportunity to support the growth of digital enterprises on the peninsula through the generation of related TV and film post-production work.

19.3 Whilst the proposed facility is welcomed, it is a relatively unique employment generating use. This uniqueness does create certain concerns around its deliverability. Therefore a clause will be included in the S106 Agreement that if it is not implemented within a reasonable timescale, then the use of the land will be converted to another employment generating use.

20. Job Creation

20.1 In terms of the London Plan Policy 2.13 and Table A1.A of Annexure 1, there is a strategic aspiration for the Peninsula to provide 7,000 jobs within the opportunity area. The Core Strategy identifies that 21,000 jobs are needed for Greenwich as a whole.

20.2 The 2015 development is expected to provide 7,434 new direct job opportunities, based on the floorspace of the Development Specification. These are expected to generate 5,854 indirect employment opportunities. When these are added to the existing 4,738 employees in the broader Greenwich Peninsula area, the result is a total of 18,026 jobs. In addition, the new development is expected to create 4,696 construction jobs.

20.3 Whilst these figures represent a drop from the 23,681 jobs anticipated to be created by the 2004 Masterplan, they still represent a significant contribution to increasing employment in the Borough, in line with London Plan and Core Strategy aspirations.

21. Social Infrastructure

21.1 Policy 3.16 (Protection and Enhancement of Social Infrastructure) of the London Plan requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. Boroughs should ensure that adequate social infrastructure provision is made to support new developments. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration.
21.2 As stated in the London Plan ‘social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural play, recreation and sports facilities, places of worship, fire stations, policing and activities which contribute to making an area more than just a place to live’.

21.3 Core Strategy Policy CH1 (Cohesive Communities) requires all development to include measures to create and maintain cohesive communities. Developments are expected to support new and improved community facilities as they play an important role in developing stronger and more cohesive communities.

21.4 The overall requirements arising from the proposed new development for education, health and open space have been assessed in the ES. As a consequence, the proposed 2015 Masterplan would provide the following social infrastructure to support the development:

- A new through school (Zone C)
- An extension to Higher Education (Ravensbourne College) (Zone D)
- A new primary school including nursery facilities (Zone A)
- Healthcare facilities (Zone A, C and D)
- New Children Play spaces
- Ancillary gyms to the residential use
- A 5km running route
- Ancillary D1 and D2 uses in the residential neighbourhoods
- Local retail uses within the residential areas.

21.5 In this context, there are already a number of existing key pieces of social infrastructure on the Peninsula delivered pursuant to the 2004 Masterplan which include:

- Ravensbourne College
- Crèche facilities (Plot 119)
- Pharmacy (Plot N0204)
- Prayer Space (Plot M0119 - to be constructed))
- Gym (Plot M0119 – to be constructed)
- Cultural Space (Jetty)

21.6 Overall, it is concluded that the proposed 2015 Masterplan will provide the social infrastructure necessary to meet the needs of the future population and hence to develop a stronger and more cohesive community.

22. Education
22.1 Two schools are proposed in the development. One is an all through school which is intended to be an extension of the existing St Mary Magdalene School. This will be located in Lower Brickfields, opposite Greenwich Millennium Village, in what is intended to be a more family oriented neighbourhood. The site made available for this school is larger than the site offered for the school under the 2004 Masterplan which is welcomed.

22.2 Another primary school is proposed in the Meridian Gardens neighbourhood. Given that this will be the most dense and therefore highly populated part of the development, it is a suitable location.

22.3 Overall, it is considered that the two schools will help mitigate the residential intensification on the site, in accordance with London plan policy 3.16.

23. Health

23.1 The Council encourages decisions that make the healthy choice a convenient attractive option for residents, helping them to lead healthier lives more easily. Greenwich’s emerging Healthy Urban Planning Framework (HUPF) recognises that appropriate planning and designing of the built environment can promote better health outcomes in the Borough.

23.2 Core Strategy Policy CH2 sets out requirements for development to enable residents to lead more healthy and active lifestyles and to build healthier communities. These include (but are not limited to): major developments should take account of the impact of development on health inequalities, which should include a Health Impact Assessment and ensure that new development of health facilities is appropriate to local needs.

23.3 Policy 3.17 of the London Plan requires that development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking.

23.4 The application proposes 1,462 sq.m of floorspace for Health Care facilities. Initially this was to be provided on three separate sites within the residential neighbourhoods. However, the Greenwich Clinical Commissioning Group in their comments on the application stated that their preference would be for “a single new facility of 1,300 to 1,500sqm close to the North Greenwich Transport Interchange, but all options will need to be examined.” The proposed amount of floorspace falls within this identified range.
23.5 In response to the comments from the Greenwich Clinical Commissioning Group, the three separate sites have since been combined into one building in Peninsula Central.

23.6 A Health Impact Assessment was submitted with the application which assesses the likely health impacts of the proposals. It is considered that the proposed development provides a sufficient new health facility to support the increase in residents that would result from the development. In addition the development includes measures to encourage a healthier community.

24. Visitor Attraction

24.1 Greenwich Peninsula is identified as an Opportunity Area within the London Plan. The London Plan states that ‘the Peninsula plays two key strategic roles, as an internationally significant leisure attraction and as a major contributor to meeting London’s Need for additional housing’.

24.2 London Plan Policy 4.6 supports the enhancement of arts, culture, sport and entertainment provision in London. The visitor attraction would be located in the Peninsula Central District. The exact nature of the attraction is unknown at this stage but examples of the type of use that could be would be a theme park, hands-on science centre or a media attraction. Policy TC5 of the Core Strategy supports sports and leisure uses in the vicinity of the O2. It is considered that this use will complement the emerging character of Greenwich Peninsula as a leisure and entertainment destination.

25. Hotel and Serviced Apartments

25.1 The Core Strategy recognises that Greenwich currently has a limited success in attracting overnight visitors and there is a need to improve the range of accommodation and the evening hospitality and leisure offer. The 2015 Masterplan includes up to 35,999sqm of Hotel use and up to 20,366sqm of serviced apartments which would be located within North Greenwich District Centre. The location of the hotel use within the District Centre which is identified in the Core Strategy as a leisure-led district centre is in accordance with planning policy. It is also in accordance with Core Strategy policy EA5 which supports the provision of hotels in the waterfront area and Policy 4.5 of the London Plan which is to support London’s visitor economy.

26. River Use

26.1 The application site includes part of the River Thames. Works that would take place in the river proposed by the outline application would be limited to
the existing jetties and the provision of the new jetty at Meridian Quays as defined in the description of development and shown on parameter plan 07-071.

26.2 Any development in the river or affecting the river would have to be the subject of further design and application and therefore consultation to ensure it meets all required legislative and planning standards. In addition, a condition is proposed requiring that any detailed proposals relating to structures in the river demonstrate that they include river related uses.

26.3 The existing and proposed jetties are located within the River Thames, which forms part of the ‘Blue Ribbon Network’ as identified in the London Plan 2015. London Plan policies 7.24, 7.25, 7.27 and 7.28 are therefore relevant. These policies seek to ensure the protection of the Blue Ribbon Network from unsuitable or harmful development and prioritising uses of the water space and land alongside it safely for water related purposes, including new facilities for passenger and tourist traffic. Policy 7.27 sets out that proposals should enhance the use of and access to this network, and should protect waterway support infrastructure such as jetties whilst Policy 7.28 requires development proposals to restore and enhance the Blue Ribbon Network and seeks to prevent development and structures into the water space, unless it serves a water related purpose.

26.4 In addition Core Strategy policy DH(k) - Thames Policy Area is relevant. The Council will seek a high quality of design respecting the special character of the River Thames within the Thames Policy Area defined on the Proposals Map. Proposals within the Area will be expected to: incorporate sustainable modes of passenger, freight and tourist transport, including river transport, as appropriate; Consider strategic and local views; protect and enhance the river and its foreshore for wildlife and nature conservation, avoid encroachment other than for river dependent uses and contribute positively to the improvement of the local environment; and protect the integrity of existing flood defences to minimise flood risk.

26.5 The above London Plan and Core Strategy Policies are geared towards ensuring that new uses proposed in the River Thames are river related and do not detract from the character of the Blue Ribbon Network or the Greenwich Waterfront. It is considered that the proposals in relation to the existing and proposed jetties would be in accordance with these policies.

27. Design and Townscape
27.1 High quality design is central to the objectives of the NPPF, the London Plan and the Royal Borough’s Core Strategy.

27.2 The aim of the NPPF is to proactively deliver sustainable development to support the Government’s housing and economic growth objectives and meet the needs of the country. To achieve this, the NPPF seeks to encourage the effective use of resources, including the reuse of brownfield land and through actively managing patterns of growth (Paragraph 17).

27.3 The NPPF states that ‘good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.’ The key principles with regards to achieving good design in the NPPF (paragraph 58) include:

1. to function well and add to the overall quality of the area over the lifetime of the development;
2. to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
3. to optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
4. to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
5. to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
6. to be visually attractive as a result of good architecture and appropriate landscaping.

27.4 Good design is specifically promoted by the policies contained within Chapter 7 of the London Plan which address both general design principles and specific design issues. Paragraph 7.2 states that the quality and function of neighbourhoods and places, access, heritage, local character, landscapes, inclusive design, safety, security and resilience, green infrastructure, biodiversity, air quality, soundscapes and the Blue Ribbon Network all contribute towards making London a special place and improve quality of life (paragraph 7.2). The relevant design policies are: 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.10 and 7.11. These policies and policies elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views and the public realm amongst other matters. New
development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood.

27.5 Paragraph 4.4.1 in the Core Strategy states that higher standards of environmental quality and design are important in assisting the regeneration of Royal Greenwich and contributing to the quality of life. Policy DH1 of the Core Strategy requires that all developments are of a high quality of design and demonstrate that they positively contribute to the improvement of both the built and natural environments. It goes on to list the characteristics that development proposals should meet to achieve a high quality of design. Other relevant design policies are DH2, DH3, DH4, DH(g), DH(i) and DH(k).

28. **Layout**

28.1 The 2004 Masterplan was based around a radial structure emanating out from The Dome with a large park at the heart of the site. The revised plan has moved away from this radial structure towards a more regular grid that when viewed on plan reflects the grid structure on the adjacent riverbank at Canary Wharf. This helps create a legible and visually permeable layout that will allow views in, out and through the site from both sides of the river.

28.2 The other key move is the extension of the Central Park by widening the northern end and the introduction of a new riverside park to the west of the site in the Meridian Quays district. The new park will form part of a new east-west green link from the west bank, through Mitre Square and towards the consented Peninsula Central East development on the east bank of the peninsula in the Upper Riverside district. This is made possible by a proposed raised green walkway over the Blackwall Tunnel Approach Road. The new park in addition to the extended Central Park are part of an ordered crucifix structure to the open space that forms a key part of the masterplan and will further help reinforce the overall legibility and enable open views towards the river.

29. **Height, Massing and Tall Buildings**

29.1 Policy 7.7 of the London Plan states inter alia that tall buildings should be limited to sites in the areas (which include Greenwich Peninsula), relate well to its surroundings, enhance the skyline of London, incorporate highest architectural design and make a significant contribution to local generation. Policy DH2 of the Core Strategy states that Tall Buildings may be appropriate in Greenwich Peninsula. The Guidance on Tall Buildings (CABE and English Heritage) 2007 acknowledges that in the right place, tall buildings can make
positive contributions to city life and can serve as beacons of regeneration, and stimulate further investment.

29.2 The development Parameter Plans and Design Guidelines set out how these policy objectives will be achieved. In the majority of cases, the parameter plan proposes buildings that could achieve heights taller than those assumed in the 2004 Masterplan due mainly in response to the emerging and changing character of the area (the newly allocated leisure-led District Centre close to North Greenwich station and the O2 and permitted development on the Peninsula). The principle of the increased heights is considered to be acceptable for this site, given its unique character and the context of surrounding development, particularly at Canary Wharf.

29.3 The 2015 Masterplan establishes and reinforces a pattern of streets, roads, open space and public realm areas, to ensure clear east/west connections between the new North Greenwich Station transport interchange and the River Thames and also north/south connections to and from the O2 and the wider Greenwich area. Added to this, there is a very clear and robust rationale for the location of the proposed taller buildings on the Peninsula.

29.4 As this is a planning application for outline permission, only building envelopes are set within the submitted parameter plans to be approved as part of the permission. These set out the maximum parameters for building heights. They also define the areas of public open space/public realm as well as key vehicular and pedestrian routes. However, the rationale for building heights across the Peninsula is set out and explained further in the Design Guidelines. The Design Guidelines will be an approved document and the Zonal Masterplans and reserved matters applications will be expected to demonstrate conformity with the Guidelines.

29.5 Overall, the intention is that:

North-South Height gradient: The development will be generally taller in the north of the Peninsula closer to the O2 and lower towards the south of the Peninsula closer to Millennium Village.

Central Park and Eastern Riverfront: Development will concentrate taller buildings along the eastern riverfront and Central Park, while retaining lower building heights in-between. The Film Studios will be significantly lower than the park edge residential development adjacent to it.
Meridian Quays Park: The development will decrease in height as it approaches the park edge to open up views towards the park and retain high environmental qualities and daylight/sunlight penetration.

Design District: the height will be a maximum of five storeys to retain views of the O2 from the Central Park.

Meridian Quays Riverfront: The development height along the river frontage will vary to ensure views towards to the river.

29.6 The exact detail of the design, materials, layout and heights of the proposed buildings will be subject to further detailed consideration at the zonal masterplan and reserved matters stages. The submitted Design Guidelines provide design principles for the development to come forward. It is considered that the Illustrative Scheme described in the Design and Access Statement demonstrates that a high quality, cohesive development will be delivered on the 2015 Masterplan site. It is further considered that the Design Guidelines include sufficient detail to ensure a scheme of the quality envisaged in the Design and Access Statement will come forward on the site.

30. **Townscape, Visual and Built Heritage**

30.1 The London View Management Framework explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views. The Site is located at the eastern extremity (right hand pane) of LVMF London Panorama 5: Greenwich Park – the General Wolfe Statue. There are essentially two parts to the protected vista: A) the narrow linear view looking north west towards the City with St Paul’s Cathedral as its centre; and B) the broad sweeping panorama looking north across the Isle of Dogs described above taking in the City on the left, the Isle of Dogs and Canary Wharf in the centre and Greenwich Peninsular on the right. The LVMF describes the panorama and identifies a number of landmarks in the view including the Millennium Dome (O2 Arena).

30.2 The ES confirms that the likely visual effect of the 2015 Masterplan on this view would be minor to moderate negative during construction and minor positive in operation and not significant.

30.3 Core Strategy Policy DH(g) states that planning permission will only be given for development which would not have a materially adverse effect on the overall perspective and essential quality of the Local Views which include:
1. Shooters Hill to Central London;
7. Thames side panorama from the Thames Barrier open space;
8. St. Mary’s Churchyard towards Mast Pond Wharf and beyond
9. Dockland’s Panorama from the Wolfe Monument
11. Millennium Dome from Central Park
13. Others set out in the Conservation Appraisal

30.4 The ES confirms that in relation to the views identified above the 2015 Masterplan would be visible in Local View Nos 1, 8, 9, 11 and 13. In terms of the views the following can be concluded:

Local View 9: The 2015 Masterplan would be located in the background of the view on the right hand side of the panorama. Taking into account various factors including the distance of 1.9km, the contemporary urban context and intervening built and vegetated features in the view, and the retained, picturesque glimpse of Millennium Dome / O2 Arena, the predicted visual effect would be minor to moderate negative during construction and minor positive in operation and not significant.

Local View 11: would be significantly affected in a negative way during construction and in a positive way during operation as set out in the Assessment of Verified Views.

Local View 7 and 8: The development proposal would be visible at long range in Local View 7 and Local View 8 and would cause minor positive visual effects during operation.

Local View 13: The masterplan proposal would also be visible in the eastern (downstream) part of the panorama from the Cutty Sark Public House / Ballast Quay which is from the riverfront of East Greenwich Conservation Area. Overall the 2015 Masterplan would have a minor to moderate positive effect on this view during operation.

30.5 During construction, overall, the ES concludes that the 2015 Masterplan would cause significant negative effects on the townscape and visual environment of the Site and immediate surrounding area. However, this would be temporary in nature, lasting only for the duration of the works. Similar levels of significant negative effects would arise on the setting of onsite built heritage during construction. There would be no effects on the physical fabric of heritage assets. Lower levels of negative effect would occur in the wider surrounding area which would not be significant. No other significance negative effects would arise during construction including in relation to London views protected in the LVMF, in particular London Panorama 5, local
views designated in the Core Strategy, the setting of Maritime Greenwich WHS and Greenwich Park, and the character and setting of East Greenwich and Coldharbour Conservation Areas.

30.6 The 2015 Masterplan would cause no direct impacts on built heritage as there are no plans to demolish or physically alter any built heritage features as part of the development. However, impacts on the setting of heritage assets on the Site and within the surrounding area have been assessed in the ES.

30.7 There is one group of listed buildings (70-84 River Way, a row of eight two storey cottages) and one locally listed building (The Pilot Public House on River Way) located within the application site. There are also two further listed buildings on the Peninsula (The Entrance to Blackwall Tunnel and the southern ventilation shaft to the Blackwall Tunnel Southbound) but outside the application boundary.

30.8 The assessment concludes that with regard to the Listed Buildings and locally listed properties on the Site, there would be a significant enhancement of the townscape and visual environment of the setting of the Blackwall Tunnel Entrance Building, No.s 70-84 River Way and the Pilot Inn which would, on balance, have a positive effect on their setting. The setting of the Southbound Ventilation Shaft would be preserved and the significance of this asset unaffected. Listed Buildings in the surrounding area would be subject to lower levels of change to their surroundings such that the effect on their settings would be negligible in the long term and not significant.

30.9 On completion, the 2015 Masterplan would generate significant positive effects on the townscape and visual environment of the Site and immediate surrounding area which would be permanent in nature. There would be no negative effects on the physical fabric of onsite heritage assets and their settings would be preserved and in some cases enhanced. Lower levels of not significant positive effects would occur in the wider surrounding area. No other significant effects (positive or negative) would arise during operation including in respect of designated London views in the LVMF including London Panorama 5 and local views protected in the Core Strategy, and the character and settings of Maritime Greenwich WHS, Greenwich Park RPG, and East Greenwich and Coldharbour Conservation Areas would be preserved and unharmed.

31. Impact of the 2015 Masterplan on Listed Buildings

31.1 There is one group of listed buildings (70-84 River Way, a row of eight two storey cottages) and one locally listed building (The Pilot Public House on
River Way) located within the application site. There are also two further listed buildings on the Peninsula (The Entrance to Blackwall Tunnel and the southern ventilation shaft to the Blackwall Tunnel Southbound) but outside the application boundary.

31.2 When considering the effect of the 2015 Masterplan on listed buildings and conservation areas within the Site and in the vicinity, the decision maker must have special regard to the desirability of preserving the listed building or its setting; or preserving or enhancing the character or appearance of the conservation area (ss.66 and 72 of the Listed Building Act). The NPPF reiterates this advice (paragraphs 132-134).

31.3 London Plan policy 7.8 states that developments affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Core Strategy policy DH(i) states that there will be a presumption in favour of listed buildings and goes on to state that proposals for development which would detract from the setting and proportions of a Listed Building or group would be resisted.

31.4 The setting of the Listed Buildings within the red line application boundary have already been significantly influenced by the grant and evolution of the 2004 Masterplan, and in particular the delivery of the Central Park to the north and south of the buildings; and indeed by the development (via detailed drop applications) of the buildings currently under construction to the east.

31.5 The Townscape, Visual and Built Heritage (TVIA) Volume of the ES has assessed in detail the effect of the 2015 Masterplan on listed buildings and conservation areas on and in the vicinity of the Site and, in particular, how the current proposals both preserve and – in some cases – enhance the setting of these assets. There are no plans to demolish or physically alter any built heritage feature as part of the 2015 Masterplan.

31.6 The TVIA confirms that, although the 2015 Masterplan will considerably alter the physical surroundings of certain heritage assets, the ability to appreciate the assets from the immediate and extended setting will be preserved in every case. In addition, the proposals serve to enhance the setting of a number of the Listed Buildings.

31.7 Central Park is to be widened across its entire length; routes along the park edge strengthened; permeability to and from the park reinforced throughout the new scheme; and views of the Listed Buildings to and from the O2 similarly enhanced and strengthened.
31.8 Overall, it is considered that the development complies with the NPPF, London Plan and Core Strategy in relation to protection and enhancement of heritage assets.

32. **Open Space, Public Realm, Landscaping**

32.1 The NPPF (paragraph 58), requires development to include green and other public spaces.

32.2 London Plan policy 2.18 states that development should make the public realm comprehensive with gateways and focal points and that architecture should contribute to a coherent public realm, streetscape and wider cityscape.

32.3 The Council’s Core Strategy seeks a high standard of landscaping in all development, taking into account ecological factors.

32.4 The Public Realm Parameter Plan (07-076) demonstrates how the 2015 Masterplan would deliver a scheme which would provide significant areas of public open space. The proposed development will provide extensive areas of landscaped public open space, communal amenity space and public realm.

32.5 The 2015 Masterplan site is within 8 km radius of a variety of District Parks, Metropolitan Parks and Regional Parks including Greenwich Park, Blackheath and Bostall Woods. Within the wider open space context identified in the London Green Grid the Greenwich area is linked to the South East London Green Chain which forms an extensive connected network of parks and open spaces which have a varied character including ancient and semi ancient natural woodland, historic parkland, heath, horse paddocks, playing fields and allotment gardens. The Cable Car connections provide a link between the masterplan and the Lea Valley Regional Park to the north. The siting of the Olympic Park within the Lea Valley provides state of the art sport facilities and a major new park.

32.6 Dedicated playing fields could be provided on the Peninsula, at the proposed school (to the south) and/or within Central Park. Central Park could also incorporate small multipurpose sport pitches (court games) such as tennis courts and basketball. The central lawn has the dimension and provision to allow for ball games such as football, rugby and cricket. South Park, which is associated with Millennium Village and in close vicinity of the application site includes a grass area large enough to hold a cricket match.

32.7 It is considered that the development will deliver sufficient high quality areas of public open space and public realm within the 2015 Masterplan. Details of
these areas and the landscaping will come forward in terms of the Zonal Masterplans and Reserved Matters applications.

33. **Children’s Play Space**

33.1 London Plan Policy 3.6 states that development proposals that include housing should make provision for play and informal recreation based on the expected child population generated by the Scheme. The Mayor’s Supplementary Planning Guidance ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation’ (September 2012) sets out further guidance on this matter.

33.2 The Mayor’s SPG provides benchmark standards for assisting in the development of local standards and to be flexible enough to meet the varying needs of children and young people.

33.3 Policy H(e) of the Core Strategy states that residential developments that include over 50 units of family housing, suitably designed children’s play areas are required for different age groups.

33.4 The anticipated child yield for the 2015 Masterplan is 3463 children. Based on the GLA’s recommended allowance of 10sqm per child, 34,629.6sqm of play space would be required for the development which can be broken down into:

- Under 5’s: 18,353.7sqm
- 5-11 year olds: 10,388.9sqm
- Over 12’s: 5,887.0sqm

33.5 It is proposed that the 2015 Masterplan will deliver a network of open spaces that provide a variety of dedicated play areas for different age groups equivalent of a District Park. Based on the area requirement calculations and acceptable walking distance from the residential areas, the play strategy is based on an equal distribution across the Masterplan area.

33.6 Doorstep play space for children under five would be provided within the communal amenity spaces incorporated within the overall design of the residential blocks. The detail design, size and layout of these areas will come forward through the Reserved Matters Application.

33.7 Children aged 5 to 11 and over 12’s are provided for in the playable space in the overall network of public realm and also provided in dedicated play spaces in the various parks within 400 metre walking distance. Dedicated play spaces
for children aged 5 to 11 are situated in the local parks such as Central Park which is within the 800 hundred metre walking distance of all residential areas. This park provides ample open grassed areas suitable for informal and organised play.

33.8 The GLA’s online tool will be used to calculate the amount of play space that would be required within each Zone, as part of the Zonal Masterplans, and when reserved matters applications are taken forward, when these can be based on the housing mix proposed for each zone and plot. The provision of playspace in accordance with the Mayor’s Standards is to secured by a condition.

33.9 It is considered that the illustrative scheme demonstrates that the amount of child play space which is required from the 2015 Masterplan to meet the policy requirements.

34. Residential Amenity

34.1 The NPPF makes a general stipulation that ‘planning policies and decisions should always seek to ensure a good standard of amenity for existing and future occupants of land and buildings’.

34.2 Policy DH(b) of the Core Strategy states that ‘When determining applications for new developments, extension or renovations of buildings, the Council will oppose development that causes an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight or privacy they enjoy or result in an un-neighbourly sense of enclosure.

34.3 London Plan policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

34.4 The nearest existing or consented residential properties in the surrounding areas are the developments on Plots M0121, M0104, M0103 and M0114 in the 2004 Masterplan area to the south east of the site, the consented residential scheme to the south east of the O2, known as Peninsula Central East, the properties in Greenwich Millennium Village on the opposite side of John Harrison Way to the south and the residential cottages in River Way.

34.5 In terms of the sunlight the ES concludes that there is likely to be a direct, permanent and long term effect of moderate negative significance on the sunlight levels of neighbouring receptors surrounding the site. However, the
residual effects following mitigation (reducing south facing windows through design, building form and massing) are likely to be a direct, permanent and long term effect of minor to moderate negative significance on the sunlight of existing receptors.

34.6 The ES concludes In terms of the sunlight assessment considering the sunlight impact assessment of the 2015 Masterplan overall, there is likely to be a direct, permanent and long term effect of moderate negative significance on the sunlight levels of neighbouring receptors surrounding the site. However, the residual effects following mitigation (reducing south facing windows through design, building form and massing) are likely to be a direct, permanent and long term effect of minor to moderate negative significance on the sunlight of existing receptors.

34.7 The maximum heights proposed on the plots in the 2015 Masterplan are of a similar scale to the existing or consented buildings listed in the paragraph above. This together with the design principles in the Design Guidelines and the distances between the existing and proposed development will ensure that the 2015 Masterplan detailed scheme will not result in a significant impact on surrounding developments in terms of overshadowing, loss of outlook or result in a loss of privacy.

34.8 It is considered that the proposal would be in line with relevant amenity policies as set out in the Core Strategy and London Plan.

35. Daylight, Sunlight and Overshadowing

35.1 There is no national planning policy directly related to sunlight and daylight. However, most Local Authorities recognise the guidelines set out in the BRE Guide Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice as the most appropriate method for daylight, sunlight and overshadowing assessments.

35.2 The London Plan Policy 5.3 states that development should meet a number of sustainable design principles including ‘…ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions’. Policy 7.6 goes on to state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings in relation to privacy, overshadowing, wind and microclimate. Policy 7.7 goes on to state that tall buildings should not affect adversely their surroundings in terms of microclimate, wind turbulence, overshadowing.’
35.3 In terms of the sunlight assessment considering the sunlight impact assessment of the 2015 Masterplan overall, there is likely to be a direct, permanent and long term effect of moderate negative significance on the sunlight levels of neighbouring receptors surrounding the site. However, the residual effects following mitigation (reducing south facing windows through design, building form and massing) are likely to be a direct, permanent and long term effect of minor to moderate negative significance on the sunlight of existing receptors.

35.4 In terms of daylight impact assessment of the 2015 Masterplan the residual effects following mitigation are likely to be a direct, permanent and long term effect or minor to moderate negative significance on the daylight of neighbouring receptors surrounding the site.

35.5 The results of the Overshadowing assessment indicated that overall there is likely to be direct, permanent and long term effect of moderate negative significance on the overshadowing levels of neighbouring open spaces surround the site.

35.6 These results are inevitable in a proposed new urban development and these matters will be assessed and considered further when the final massing is known at the reserved matters stage.

36. Wind Microclimate

36.1 The NPPF in paragraph 110 states that pollution should be minimised as well as other adverse effects on the local and natural environment. London Plan policy 5.3 states that development should ensure developments are comfortable and secure for users including avoiding the creation of adverse local climatic conditions. Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings which includes, inter alia, wind turbulence.

36.2 The likely significant effects of the 2015 Masterplan on the local wind environment have been assessed against best practice criteria for pedestrian comfort and safety.

36.3 During construction the effects on the wind microclimate on the Site are a function of the massing of the 2015 Masterplan which would progressively vary during the construction phase.

36.4 In terms of the 2015 Masterplan proposals, leisure walking and business walking indicate that all areas within the site and it surroundings remain within
the comfort criteria suitable for pedestrian walking. In terms of pedestrian safety the results identify areas of increased windiness under strong winds which would benefit from mitigation. Tree planting and landscape features would help mitigate wind acceleration particularly along areas such as Peninsula Waterfront, the south side of Ravensbourne College and the Western Link Park.

36.5 It is intended that the overall general effect of the 2015 Masterplan is to reduce wind speeds which would be beneficial to the wind environment of the Site compared to the baseline condition.

37. Noise and Vibration

37.1 The NPPF Paragraph 123 states that “Planning policies and decisions should aim to: (1) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; (2) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions; (3) recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and (4) identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”

37.2 London Plan policies 5.3 and 7.15 seek to, inter alia, ensure that development proposals manage noise by avoiding significant adverse noise impacts on health and quality of life. Core Strategy policy H5 states that new housing development should have an acceptable level of noise insulation through design, layout and in development vulnerable to transportation noise and vibration. Policy E(a) goes on to state that “Planning permission will not normally be granted where a proposed development or change of use would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit. Housing or other sensitive uses will not normally be permitted on sites adjacent to existing problem uses, unless ameliorating measures can reasonably be taken and which can be sought through the imposition of conditions.”

37.3 The ES provides an assessment of the likely noise and vibration effects of the 2015 Masterplan and identifies any that are likely to be significant in the context of the Site and surrounding area. In particular, it considers the
potential effects on the surrounding environment of noise and vibration arising during the construction and operational phases of the 2015 Masterplan. This includes noise from changes in traffic flow on the surrounding road network and from fixed mechanical plant on existing and proposed noise sensitive receptors (NSRs).

37.4 The ES concludes that residual construction noise and vibration effects at existing receptors would be of minor adverse significance with the mitigation specified in the assessment. Residual operational noise and vibration effects at existing receptors would be of negligible significance with the mitigation specified.

37.5 The assessment of the suitability of the site for noise sensitive uses indicates that mitigation measures will need to be applied to residential buildings and hotels in order to provide protection from high levels of road traffic noise and noise from activities on the neighbouring Wharf. An open window ventilation strategy will not be appropriate for the school. More detailed studies will be employed for particularly sensitive areas of the site to determine the exact specifications for mitigation as each plot of land comes forward for development. These are to be secured by suitable conditions.

37.6 On the basis of the above, it is considered that the development will be in accordance with the national, regional and local planning policy requirements.

38. Air Quality

38.1 The NPPF states that ‘planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

38.2 The London Plan seeks to ensure that adverse impacts on air quality from development is avoided. Policy E(c) of the Core Strategy states that development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to minimise the impact of air pollutants are included.

38.3 The ES reports the likely significant effects of the 2015 Masterplan on the site and surrounding area in terms of air quality. In particular it considers the likely potential effects of the construction and operational phases of the 2015 Masterplan on local air quality at identified public exposure locations.

38.4 The assessment confirms that the 2015 Masterplan is considered to represent a medium to low risk overall for demolition earthworks, general construction
activities. However, through good site practice and the implementation of suitable mitigation measures, the impact of dust and PM10 releases will be reduced and excessive releases prevented. The residual impact of the construction phase on air quality is therefore considered to be temporary, medium to long term, local and of negligible significance according to the relevant significance criteria.

38.5 In terms of the operational stage of the development, through mitigation measures (for example suitable mechanical ventilation system) suitable air quality levels can be provided. Conditions regarding air quality are included in the recommendation. Obligations requiring measures for air quality neutral offsetting as well as continuance of the Low Emission Zone are to be secured via the S106.

38.6 Overall it is considered that with mitigation measures the 2015 Masterplan would comply with the European and national air quality and national, regional and local planning policy.

39. Safeguarded Wharves

39.1 The application site is located adjacent to the safeguarded wharves Victoria Deep Water Terminal (VDWT) and Tunnel Glucose (Wharf) and to the boatyard facility at Bay Wharf.

39.2 Policy 7.26 of the London Plan seeks to protect safeguarded wharves for waterborne freight handling use. The policy states that development proposals “adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance.”

39.3 Paragraph 7.79 expands on this point explaining that “the challenge is to minimise conflict between the new and old land uses. This must be met through modifications and safeguards built into new and established development…New development next to or opposite wharves should utilise the layout, use and environmental credential of buildings to design away these potential conflicts.”

39.4 The residential development at Meridian Quays would be closest to the VDWT and the other safeguarded wharves. The Wharf operators and the Port of London Authority have objected to the application as they have concerns about the juxtaposition of this development with the safeguarded wharves. The activities at the wharves produce noise and dust that could be a nuisance to adjacent occupiers.
39.5 As the application has not been designed in detail, the exact impact of the wharves cannot be determined at this stage. However, the applicant has acknowledged the potential impact and proposed strategies in the Design Guidelines for the design of the Meridian Gardens neighbourhood so as not to prejudice the operation of the wharves. These relate to:
- orientating the sensitive parts of the development away from the wharves;
- employing acoustic mitigation measures;
- design measures to locate residential development further from the wharves;
- consider the effects of light impact from the wharves
- introduce a landscape buffer facing the wharves

39.6 In addition, in response to the concerns raised, the applicant has agreed that the relevant parts of the development should be subject to conditions requiring further noise and dust assessments at the detailed stage of design. These conditions have been included in the recommendation.

39.7 There are examples elsewhere on the River Thames where residential development has been proposed in close proximity to safeguarded wharves such as Greenwich Millennium Village and Comleys, Swedish and Albert Wharves. Planning conditions have been critical to the success of these schemes.

39.8 It is therefore considered that suitably worded conditions together with the proposed design guidelines can be applied to address the potential need for mitigation measures.

40. Hazardous Substances and Installations

40.1 Policy 5.22 of the London Plan states that “When assessing developments near hazardous installations:
  a site specific circumstances and proposed mitigation measures should be taken into account when applying the Health and Safety Executive’s Planning Advice Developments near Hazardous Installations (PADHI) methodology
  b the risks should be balanced with the benefits of development and should take account of existing patterns of development.”

40.2 There are two nearby sites with Planning (Hazardous Substances) Consent; Brenntag UK, Tunnel Avenue and the East Greenwich Gasholder Station. Both of these installations are subject to radial Consultation Zones (CZ) established by the Health and Safety Executive (HSE) in which certain sensitive
development is restricted for safety reasons. The HSE is a statutory consultee for certain development proposals within notified areas (ie HSE Consultation Zones (CZ)) around major accident hazard sites and pipelines.

40.3 The operator of the East Greenwich gasholder station, Southern Gas Networks (SGN) has written to the HSE advising of the current non-operational status of the gasholder. Thereby dis-applyng, for the time being, the regulatory requirements of the Control of Major Accident Hazards (COMAH) regulations. However, even though this means that the gasholder has been decommissioned, SGN still holds a hazardous substances consent for the installation. Therefore the Consultation Zones from the gasholder remain a consideration in the development of this site.

40.4 In reaching a decision on the planning application the planning authority needs to be aware of the residual risk of a major accident on the proposed developments from the storage of hazardous substances that is permitted under planning legislation. The planning authority may take into account the current operational status of the major hazard site as a material consideration at the time the decision is made. However, HSE’s public safety advice is based on the permitted presence of hazardous substances.

40.5 HSE’s detailed advice includes a number of conditions and explanations to support the council in considering most carefully the specific circumstances of the risks from the two sites with hazardous substances consent and for the council to act in full understanding of that advice and the consequences that could follow.

40.6 HSE would usually advise that there are sufficient public safety grounds for refusal of a proposal of this type and intensity near major accident hazard sites or pipelines. However, in view of the large area of land involved (much of which falls beyond the HSE CZs), the zoning of the proposed redevelopment and the sub-division of the zones into Development Parcel and Plot Numbers, HSE is able to provide bespoke detailed advice on the application. The HSE’s land use planning advice is based on the named area, zone and/or Parcel and Plot Number, as appropriate.

Central Park

40.7 In view of the pre-existence of open park land at this location, HSE’s advice is that there are insufficient public safety grounds for permission to be refused for this element of the redevelopment. However, whilst the hazardous substances consent for the East Greenwich Gasholder Station remains in force, HSE would not encourage the provision of dedicated playgrounds, where children might congregate in significant numbers, on the gasholder side.
of the park. An informative has been included in the recommendation advising that the HSE have advised that they would not encourage the introduction of new dedicated playgrounds on the gasholder station side of Central Park until the hazardous substances consent for the East Greenwich Gasholder Station has been revoked.

**Zone A (excluding Central Park), Zone D and Zone E**

40.8 In view of the predominant uses proposed in these areas and the associated levels of residual risk, HSE's advice is that there are insufficient public safety grounds for permission to be refused for these elements of the redevelopment.

**Zone B**

40.9 In view of the proposed film studio use of Parcel 15 and the predominant residential uses of Parcel 16 Plots 01 - 04, and the location of these areas within the HSE higher residual risk Inner and Middle CZs around the gasholder station, HSE's advice is that there are sufficient public safety grounds for permission to be refused for these elements of the redevelopment. However, the HSE would withdraw this advice if any planning permission included a Grampian-style condition which prevented occupation of all development within this zone until the hazardous substances consent(s) for the East Greenwich Gasholder Station had been revoked in accordance with the provision of the Planning (Hazardous Substances) Act 1990, as amended, and written confirmation of revocation had been issued by the Hazardous substances Authority.

40.10 In response to the above comment, a condition has been included in the recommendation restricting the occupation of these parcels until such time as the gasholder consent is revoked.

**Zone C (excluding Central Park)**

40.11 In view of the predominant uses of Parcel 22 Plots 02 & 03 and of Parcel 18 Plots 02 & 03 and their locations either within or beyond the lower residual risk Outer CZ, HSE's advice is that there are insufficient public safety grounds for permission to be refused for these elements of the redevelopment.

40.12 In view of the predominant residential uses of Parcel 17 Plots 01 & 02 and Parcel 22 Plot 01, and the predominant D1 use (eg school or day nursery) of Parcel 21, and their locations within the higher residual risk Middle CZ, HSE's advice is that there are sufficient public safety grounds for permission to be refused for these elements of the redevelopment. However, the HSE would withdraw this advice if any planning permission included a Grampian condition which prevented occupation of all development within these Parcels/Plots.
40.13 In view of the proposed D1 use of Parcel 18, even though it is mostly located within the lower residual risk Outer CZ, HSE's advice is that there are sufficient public safety grounds for permission to be refused. However, it should be noted that the level of residual risk over part of this area (ie that beyond the CZs) is insufficient to require consultation with HSE, and that all people inside buildings anywhere on the Parcel would be protected against the effects of foreseeable major accidents at the gasholder station.

40.14 Furthermore, a full planning application has already been made for a school on Parcel 18 (Application 15/1910/F) and that, based on HSE pre-application advice, the layout has incorporated risk reduction so that those children out-of-doors would be located either in the outer region of the lower residual risk Outer Consultation Zone or beyond the CZ altogether. Therefore, whilst the level of residual risk at Parcel 18 is sufficient, generally, for HSE to advise refusal of D1 uses there, Application 15/1910/F demonstrates that significant risk reduction is possible whereby the residual risk to children inside the buildings would be insignificant and to those out-of-doors would be very low provided they were excluded for the open area nearest the gasholder until the hazardous substances consent(s) has been revoked.

40.15 In summary with respect to the school site, whilst the HSE has concluded that it can be developed in such a way whereby the residual risk to children inside the buildings would be insignificant and to those out-of-doors would be very low (provided they were excluded for the open area nearest the gasholder until the hazardous substances consent(s) has been revoked), their advice remains that there are sufficient public safety grounds for permission to be refused for the location of a school on Parcel 18. Therefore the Council, as the Local Planning Authority must decide whether or not to go against the HSE advice.

40.16 Bearing in mind the direction in Policy 5.22 of the London Plan to take into account any mitigation measures and to balance the risks with the benefits of the development, the officers’ recommendation is that the D1 use for a school should be approved on Parcel 18 subject to a Grampian condition. Such a condition would restrict development on Parcel 18 (Plot 01) which would be likely to result in children congregating in numbers (supervised or unsupervised) in open areas (i.e. not inside buildings), for example on sport pitches, in playgrounds or at school bus waiting points, and which is located
within 375m of the centre of the gasholder at East Greenwich Gasholder Station from being occupied until such time as the hazardous substances consent(s) for the East Greenwich Gasholder Station has been revoked in accordance with the provision of the Planning (Hazardous Substances) Act 1990, as amended, and written confirmation of revocation had been issued by the Hazardous Substances Authority.

40.17 In addition the HSE has concluded that “the residual risk to children inside the buildings would be insignificant”. It is considered that the benefits that the new school would bring to area, which includes communal play facilities, would outweigh the insignificant risk.

40.18 The HSE draws attention to paragraph 072 of the Hazardous Substances section of the Communities and Local Government's Planning Practice Guidance web-based resource which guides that a local planning authority minded to grant permission against HSE's advice should give advance notice of that intention and allow 21 days from that notice for the HSE to give further consideration to the matter. Therefore, should Members resolve to approve this application, it will need to be referred to the HSE before a decision is issued.

41. Transport, Access, Servicing and Parking

41.1 The NPPF promotes the integration of planning and transport and it aims are to promote more sustainable travel choices, promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling and to reduce the need to travel, particularly by car. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion, (Paragraphs 29 and 30). It goes on to state that those developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

41.2 The London Plan encourages patterns and forms of development that reduce the need to travel by car. The Mayor recognises that transport plays a fundamental role in addressing the whole range of his spatial planning, environmental, economic and social policy priorities. It is critical to the efficient functioning and quality of life of London and its inhabitants. It also has major effects – positive and negative – on places, especially around interchanges and in town centres and on the environment, both within the city itself and more widely, (Paragraph 6.2). The key London Plan policies include: 6.1, 6.3, 6.7 and 6.13.
41.3 Policies IM4, IM(a), IM(b) and IM(c) of the Core Strategy highlight that proposals for large developments should be designed for the needs of pedestrians, people with disabilities, cyclists and public transport users first and that major activities should be located around public transport, cycling and pedestrian nodes in new developments. However, other Core Strategy policies highlight the need to provide adequate car parking facilities that are both accessible and safe. A balance must be reached to ensure that visitors are not encouraged to use the car rather than public transport.

41.4 The key transport infrastructure proposed by the 2015 Masterplan includes:

- a new bus station, with increased capacity and improved operation;
- a new station concourse building with significantly increased circulation space;
- a relocated taxi facility adjacent to the improved station building;
- the realignment of West Parkside, to provide a more direct connection with the new bus interchange;
- a new pedestrian bridge over the Blackwall Tunnel Approach Road, providing increased public transport accessibility to the west side of the Site; and
- residential access roads that will be ‘Home Zone’ environments where pedestrian and cyclists will have priority over cars.

41.5 The site incorporates the North Greenwich Underground station and bus terminus which is served by 8 bus routes, 3 of which are 24 hour. Access is also available from the River via the nearby QE2 Pier. The nearest mainline station is Charlton which is approximately 3km south east of the North Greenwich Underground station. The site generally has very good access to public transport but which varies across the site. Around the North Greenwich Transport Interchange the area has a PTAL of 6 while to the south this reduces to 1 in some parts on a scale of 1 to 6 where 6 is considered excellent. The PTAL rating is used as a means of quantifying and comparing the accessibility of public transport for a site.

41.6 In addition to the existing facilities, there are several key public transport initiatives planned in coming years including increased bus frequency and the introduction of Crossrail that will increase access to public transport. The area has benefitted from upgrades to the Jubilee Line in recent years to increase capacity and the introduction of the Emirates Air Line which should remain largely unaffected. There is also the introduction of the proposed Silvertown Tunnel link which is currently undergoing consultation. There is also a 50 space taxi rank and a private hire area at the existing North Greenwich station.
41.7 With regard to vehicular access, the A102 runs through the Peninsula and connects to the Blackwall Tunnel. The A102 and Tunnel form part of the Transport for London Route Network (TLRN) being Priority (Red) Routes. TfL are the Highway Authority for such Strategic roads. The main access to the site is along Millennium Way with an additional access via Edmund Halley Way and Blackwall Lane. Waiting restrictions apply to the main roads in the area.

41.8 In support of the application, a Transport Assessment (TA) has been provided and highlights the expected trip movements and impact on the transport network. The TA considers the accessibility of the Site within the surrounding transport infrastructure for trips made by all transport modes; examines the predicted generation of trips by all modes; assesses the effect of the 2015 Masterplan on the surrounding transport infrastructure and highlights the overall sustainability strategy adopted for the scheme. The figures have been derived from generally acceptable principles and Trip Rates used are also based on survey information from a recognised database. The modelling has been undertaken in line with TfL’s Strategic Modelling Specification.

41.9 The impact on public transport has been investigated and it is acknowledged that there would be an increase on the Jubilee Line and bus routes to North Greenwich station. This latest Masterplan is seen to have a limited impact on the national rail and London Underground networks compared to the existing base although it is recognised there would be some additional crowding between Canary Wharf and North Greenwich in the AM peak on the Jubilee Line and between Westcombe Park and Maze Hill in the PM peak on the Mainline Rail, due to the reduction in the amount of employment floor space. A more noticeable impact is expected on the operation of buses between those periods.

41.10 Overall, the Transport Assessment indicates that the London Underground and National Rail networks will be largely unaffected by the proposed 2015 Masterplan when compared with the previously consented Masterplan and the proposed improvements in services between now and 2021. The largest effects are likely to be on the bus network, where although the 2004 Masterplan also predicted large increases in bus travel it provided significant contributions to mitigate this effect. The new bus station, with improved stops, stands and circulation, will allow for a greater increase in the number of bus services that can be accommodated.

41.11 Given the encouragement to use public transport through higher density and lower parking ratio, it is recommended that a contribution is sought towards
improvements of bus routes and frequencies. In addition, a contribution is sought towards bus route improvements along Bugsby’s Way in line with the proposal in the Charlton Masterplan. Discussion with TfL is therefore required.

41.12 Whilst the Silvertown Tunnel is not yet an approved scheme, it has been declared as strategically nationally significant by the Government and is progressing to Development Consent order in 2016; the area required for this scheme has been safeguarded. Although the crossing would alleviate congestion through the Blackwall Tunnel, the Masterplan proposal is not reliant on the tunnel being provided.

Traffic and Highways

41.13 The Transport Assessment provides full details on the traffic generation associated with the different uses of the development.

41.14 The Proposed Development results in higher traffic flows on the Greenwich Peninsula highway network, where roads such as Millennium Way experience a significant increase in peak hour traffic, but will still operate within capacity. It is forecast that there would be increases in peak hour flow on key access routes to or from the area, such as Blackwall Lane northbound and southbound ramps to and from the A102; Bugsby’s Way and Peartree Way. Beyond the development boundary increased traffic levels are forecast on the A206 east (towards the Woolwich Ferry) and west (to Greenwich town centre) of the A102.

41.15 Overall, the road layout is essentially the same as previously consented in the 2014 Masterplan. As the application is in outline, details of the traffic calming, road markings, signs, drainage and street lighting etc. are to be provided under a separate condition. The layout should be designed to encourage a low speed environment of 20 mph, in line with Council’s policy for residential roads in the Borough, but its details will need to be covered by separate condition. To reduce the possible impact between a vehicular access to a car park and pedestrians it is recommended that entry treatments are provided at entrances. Given the phased development of the various plots, highway works will be provided as plots are progressed.

41.16 The existing taxi/ coach drop off and pick up areas are proposed to be relocated. The principle of a taxi rank and provision for set down and pick up for private hire vehicles at the interchange is supported; however, the detail design should ensure a better alignment to Peninsula Square.
Bus Station

41.17 The existing North Greenwich Bus Station layout has 4 pick-up stops accommodating 7 buses with another alighting stop accommodating 3 alighting buses, plus 15 bus stands. The current bus station is approaching capacity and to incorporate the sites future growth, capacity improvements are required. The 2015 Masterplan proposes that the bus station be extended as part of the proposed development. This is not possible in its current location without further increasing the segregation the bus station causes to pedestrian movement east-west through the Site. A revised bus station design has therefore been proposed that relocates the facility to the south of the underground station building. The bus station incorporates an additional four pick up stops, an additional alighting stop and two further stands, which creates an increase in capacity.

41.18 In connection with this relocation of the bus station, West Parkside would also be realigned to form a direct junction with the access to the bus station across Edmund Halley Way. This results in a more direct link between the segregated bus lanes along West Parkside and the bus station itself. The realignment of the busway will provide an improved junction between the busway and the bus station in the final design. The high level pedestrian crossing of the busway is supported as this will provide segregation between pedestrians and buses but will need to be sufficiently wide enough to cater for the potentially large crowds at peak times. The future maintenance and legal status of any revised busway design will need to be secured through the s106 process.

Impact on Public Transport

41.19 It is anticipated that most people will travel by rail with the majority using North Greenwich station although other stations, such as Charlton may also be used. There is adequate capacity at the underground station to accommodate 20,000 people and should therefore be sufficient to cater for additional demand.

Parking

41.20 This council does not have a car park standard for some of the types of use, but acknowledges the number of spaces should be broadly in line with London Plan policy. The level of car parking is similar to the overall provision in the extant scheme.
41.21 The 2004 Masterplan allows for an average parking provision across the site of 0.7 residential parking spaces per dwelling unit. To achieve this average, different development parcels would have different levels of provision. Recent consents have allowed proposals to provide 0.32 parking spaces per residential unit, which will allow for higher provision on other parcels within the Masterplan. The proposed development will reduce the car parking to 0.25 spaces per dwelling compared to the current consent. In addition, up to 200 visitor spaces will be provided within the residential streets. This represents a decrease in the amount of visitor parking to be provided in terms of the 2004 Masterplan which was 500 spaces. This reduction is considered to be in line with the current Core Strategy and London Plan parking standards which do not set a specific provision for visitor spaces.

41.22 A further 100 spaces would be provided for the Film Studio facility. No other land use will have any dedicated parking other than car club spaces. The existing commuter car park operated by TfL is to be phased out by 2021.

41.23 The proposed development will also re-locate the circa 2,000 spaces currently provided for the O2 in four surface car parks, in a multi storey car park within 500 yards of The O2. The application description states that a minimum of 2,000 spaces would be provided. Given the uncertainty that this poses and to ensure there is some control over the maximum number of car parking spaces provided for the O2 the applicant is willing to accept a condition which states a maximum of 2,150 O2 Car Parking spaces to be provided. The submitted documents for the development have tested the transport implications including surveying the existing level of car parking which is 2179 spaces. Given that the 2004 masterplan allowed up to 2,200 spaces for the O2, 2,150 spaces is considered to be acceptable.

41.24 The principal access and egress for the revised car parking arrangements is envisaged to and from Millennium Way, either directly or via Edmund Halley Way. This will keep general vehicular traffic away from the buses entering / exiting the Transport Hub during event times.

41.25 Coach parking associated with the O2 is also re-provided with a 37 space coach park located west of the proposed multi-storey car park. This facility is located within a 10 minute walk of the O2 and is therefore considered suitable for passengers to access directly on foot without requiring a coach drop-off facility outside the O2 itself and consistent with the 2004 Masterplan.

41.26 In addition to the re-provision of the car and coach parking, the existing taxi rank, private hire pick-up facility and blue badge car park would be relocated north of North Greenwich LUL Station. The relocation of the facility has been
discussed with TfL was relocated from its previously proposed location east of the bus station to its current proposed location north of North Greenwich LUL station, to ensure a direct interface with the LUL station itself.

41.27 It is considered that the amount of car parking is appropriate for the site’s location and conforms with the relevant Core Strategy and London Plan policies.

Pedestrian and Cycling Provision

41.28 At this stage the location and amount of cycle parking is not provided. However it will be delivered in accordance with Planning Policy at the Zonal Masterplan and Reserved Matters stage.

41.29 The Masterplan will also include the provision of a Cycle Super Hub within the Development. This will be brought forward as part of the detailed design and will include measures such as cycle parking, maintenance facilities, cafes all of which will seek to form a cycle culture on the Peninsula.

41.30 Further to the Super Hub and in addition to the linkages being put forward across the 2015 Masterplan area it is intended to link into the existing infrastructure as much as possible including schemes planned for the future such as the Thames Path Quietways which is set out in the ‘London Infrastructure Plan – 2050.’

41.31 Improvements to the Thames Path will be sought via the S106 Agreement.

41.32 It is considered that the proposed development will greatly enhance the pedestrian and cycling environment on the Peninsula.

River Transport

41.33 Use of the river bus service has been increasing in recent years and the Thames Clipper service is seeking to expand the number of stops and services it operates. The proposed Masterplan takes this into account within its design, reserving space and a connection to the location for the new ‘Greenwich Peninsula’ pier on the western side of the peninsula. It is understood that the new pier is to be delivered by 2021. This pier could also be used for a potential shuttle service across the River Thames.
Greenwich Waterfront Transit

41.34 In March 2009 the Thames Gateway Bridge was removed from the forward programme and therefore both the East London Transit and the Greenwich Waterfront Transit were also removed. Despite this, account has been taken of the original alignment whilst compiling the Masterplan as should the Silvertown Tunnel progress then the route can go along the converted two-way section of Tunnel Avenue. Should the Silvertown Tunnel not go ahead then the project team will re-open discussions on an alternative alignment should the scheme Greenwich Waterfront Transit re-commence.

Servicing

41.35 Servicing of the development would be from on-street via the highway network as well as from links between the plots at ground level. The proposals maintain the access from the roundabout at the northern end of Millennium Way and as such would not affect the servicing access to the O2.

Conditions and S106 Obligations

41.36 Various details in respect of delivering a robust transport infrastructure in the 2015 Masterplan area are to be secured via conditions or S106 obligations.

42 Flood Risk and Surface Water

42.1 The NPPF sets out how flood risk should be considered at all stages of the planning and development process, in order to reduce future damage to property and loss of life.

42.2 London Plan policy 5.12 requires proposals to comply with the flood risk assessment and management requirements set out in the NPPF and the associated Technical Guidance on flood risk over the lifetime of the development.

42.3 Policy E2 of the Core Strategy states that the Council’s strategic Risk Assessment be used to inform development and reduce flood risk in the Borough.

42.4 A Flood Risk Assessment was submitted with the Application and a Water resources and Flood Risk Chapter forms part of the ES. The Environment Agency Flood Map shows the proposed development to be located within Flood Zone 3. Flood Zone 3 is defined as having a high probability of flooding. It should be noted that the EA flood maps refer to the probability of river and
sea flooding, ignoring the presence of flood defence. However, the site is located within an area benefiting from flood defences. It is worth noting that flood defences reduce, but do not completely stop the chance of flooding as they can be overtopped or fail.

42.5 The FRA concludes the following:
- The 2015 Masterplan is located in an area benefiting from flood defences which corresponds to a ‘low’ flood risk area as identified by the EA. ‘Low’ means that each year, this area has a chance of flooding of between 0.1% (1 in 1,000 year) and 1% (1 in 100 year). Therefore, it is considered that the 2015 Masterplan is located in a low risk flood zone.
- Under the sequential test defined by NPPF, considering that the annual probability of flooding is between 1% and 0.1% and that the 2015 Masterplan development has a flood vulnerability classification of 'More Vulnerable', the 2015 Masterplan would be classed as 'Appropriate Development' providing the development cannot be relocated in a zone with a lower probability of flooding and the Exception Test is passed. Residential land use has previously been approved on this site in terms of the 2004 Masterplan.
- The site benefits from previously installed infrastructure which separates drainage of foul and surface water and enables surface water to be discharged directly to the Thames and therefore avoids increasing flood risk as a result of discharge to existing drainage networks.

42.6 In terms of the Exception Test it is considered that the 2015 Masterplan is in line with the Royal Borough’s Plan. It is considered that the scheme will bring significant regeneration, economic and social benefits to the local and wider area which would outweigh any flood risk. The paragraph above sets out that the scheme is unlikely to increase flood risk elsewhere. The FRA also demonstrates that with regard to tidal/fluvial flood risk, the 2015 Masterplan is safe for its lifetime.

42.7 The recommendation includes various conditions in relation to flood risk and surface water management.

43. Ecology

43.1 Policy 7.10 of the London Plan and OS(f) of the Core Strategy require development proposals will be required to take account of ecological factors. A condition requiring full details of ecological enhancement measures, protection of wildlife habitation, including appropriate planting will be imposed on any grant of Planning Permission. This is in order to enhance the nature conservation value of the site and ensure compliance with relevant policies.
43.2 In the absence of mitigation, site clearance activities could have direct effects upon nesting birds and roosting bats (if present in three buildings with low potential to support roosts), which could have direct, negative effects upon these species groups. Mitigation is proposed, as required to also ensure legal compliance with respect to these species, to avoid this. In addition the design specification includes the provision of replacement nesting/roosting opportunities and foraging habitat for both birds and bats, and habitat suitable for a range of terrestrial invertebrate species. For this reason, whilst it is probable that temporary negative effects upon fauna will occur during the construction phase resulting from the temporary reduction in habitat availability, in the long term the ES identifies that permanent positive effects are anticipated during the operational phase significant at the site and local scale respectively.

43.3 The general proposals for mitigation measures are considered to be adequate for the construction and operation phase of the development. Given the extent of the site and the range of habitats found within it a new preliminary ecological assessment should be provided for each phase of development within the Peninsula Masterplan. Detailed proposals for mitigation measures will also be required for each phase as it is brought forward. This is to be secured by condition.

43.4 There is concern that the proposals outlined in the ES do not include sufficient measures to mitigate impacts on aquatic invertebrates. However, the ES indicates that detailed proposals for habitat creation within the intertidal zone are to be produced for each relevant phase of development.

43.5 Brown and green roofs are proposed to mitigate impacts on existing habitat and species. This is to be secured by condition details will be submitted alongside proposals for each phase or reserved matters. Details on the enhancement measures proposed to make a positive contribution to the protection, enhancement, creation and management of biodiversity will also be required for each phase of development as it is brought forward.

44. Sustainability and Energy

44.1 The London Plan climate change policies as set out in Chapter 5 collectively require development to minimise overheating and contribution to heat island effects; minimise solar gain in summer; contribute to flood risk reductions, including applying sustainable drainage principles; minimise water used; and protect and enhance green infrastructure and urban greening. Specific policies cover overheating, urban greening, living roofs and walls surface water run-off
and minimising water use. The policies set out ways in which developers should consider and address mitigation of and adaption to, the effects of climate change.

44.2 Core Strategy policy seeks to encourage environmentally sustainable forms of development, the re-use and recycling of waste, traffic reduction and to encourage development that is energy efficient in terms of layout, orientation, design and use of materials.

44.3 The energy consumption and carbon dioxide (CO2) emissions associated with the Proposed Development will be reduced by following the Mayor’s Energy Hierarchy, Policy 5.2 and in line with Greener Greenwich’s Supplementary Planning Document (GGSPD):

- Passive design and energy efficiency (i.e. ‘Be Lean’);
- Energy efficient supply of services (i.e. ‘Be Clean’); and
- On-site renewable energy technologies to provide energy (i.e. ‘Be Green’)

44.4 The application states that all buildings will seek to achieve a minimum 5% improvement over Part L 2013 through passive design and energy efficiency (Be Lean). However, the applicant has stated that at this stage, it has not been possible to provide details of the passive design and energy efficiency measures that will be incorporated into the development. Therefore further detailed energy statements will need to be submitted for approval at the detailed design stage, which provides information of the measures to be included and the calculated emissions savings that they are anticipated to deliver. Greater London Authority (GLA) comments indicate a requirement that both domestic and non-domestic elements of the development shall be designed to meet Part L 2013 criterion 1 target carbon emissions through fabric efficiency measures alone. A condition has been included in the recommendation to secure this.

44.5 It is proposed that the development will connect to the District Heating Network supplied by the Greenwich Peninsula Low Carbon Energy Centre (LCEC), which is currently under construction (Be Clean). Temporary energy centres will be implemented initially to serve the plots completed before the Energy Centre is operational. Connecting to the District Heating Network is estimated to lead to an average reduction in CO2 emissions over the 2015 Masterplan of approximately 32%. This is welcomed and the recommendation includes a condition requiring details of the infrastructure to facilitate the connection.
44.6 An initial appraisal of potential renewable energy systems has been undertaken (Be Green). A number of renewable energy technologies were not considered feasible these were solar water heating panels, ground source heat pumps, biomass heating and wind turbines. Photovoltaic renewable energy has been deemed the most likely option for providing a reduction in expected carbon emissions through the use of on-site renewable energy generation. An initial assessment of the roof area which could be dedicated to PVs has been undertaken. It indicated that the low rise roofs of the Film Studios and the Schools could be the most appropriate for the installation of very large PV arrays. However, smaller PV systems may also potentially be located on the other buildings, including residential buildings. The detailed energy statements to be submitted at the detailed stages should also include full details of renewable energy technologies. This is to secured by condition.

44.7 Overall, the stated energy saving measures will contribute to a 35% carbon emissions improvement over Part L 2013 reduction, without accounting for the savings from renewable energy technologies. This is in line with the London Plan Policy 5.2 and Core Strategy policy E1.

44.8 The submitted Sustainability Assessment indicates that all residential units will seek to achieve, as a minimum, a Code for Sustainable Homes Level 4 rating. This is in line with Core Strategy Policies. However this requirement has since been removed by Central Government meaning the Council is unable to impose a condition requiring this standard. However a condition has been included which requires the scheme to achieve an equivalent standard through the building regulations.

44.9 All new non-domestic buildings above 500m2 will seek to achieve, as a minimum, a BREEAM Very Good rating. This falls below the usual ‘Excellent’ rating required under Core Strategy Policy DH1. A condition has been included in the recommendation requiring the development to seek to achieve an excellent rating.

44.10 Other conditions to secure sustainability aims are also recommended in relation to overheating, water usage, surface water drainage, waste disposal and recycling and using sustainable materials.

45. Phasing and Masterplan Zones

45.1 As set out in the development specification that supports this outline application, each of the above development zones will be the subject of its own zonal masterplan, the submission of which will be secured by condition. This document provides the specification that each zonal masterplan much
adhere to; most importantly that it must conform to the approved parameter plans, design guidelines and development specification. All reserved matters applications must also be in compliance with the zonal masterplans. A condition will be attached to secure environmental assessment screening is undertaken for all zonal masterplan and reserved matters stages in order to address any potential significant environmental effects that are unable to be identified at this outline stage. It is considered that this approach to delivering the detailed scheme would be allow the different parts of the site to come forward in a more comprehensive way than if it was reserved matters only. These zonal masterplans will come forward as submission of details applications, however, they will be referred to Members for a decision.

46. **Community Infrastructure Levy**

46.1 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 1st 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. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £35 per square metre.

46.2 The Royal Borough of Greenwich adopted its Local Community Infrastructure Levy (CIL) charging schedule, infrastructure (Regulation 123) list, instalments policy and exceptional circumstances relief policy on 25 March 2015.

47. **Legal Agreement**

47.1 The 2004 Masterplan was the subject of a comprehensive Legal Agreement. A new S106 Legal Agreement is proposed for the 2015 Masterplan which takes into account the obligations that have been delivered under the 2004 Masterplan, the obligations required to make the new scheme policy compliant and the changes necessary to the existing obligations as result of the Council’s adoption of a Local Community Infrastructure Levy (CIL) charging schedule on 25 March 2015.

47.2 It is proposed that the S106 Legal Agreement includes the following Heads of Terms:

**Affordable Housing:**
• Provision of Affordable Housing in each Neighbourhood Area
• Table showing updated minima and proposed indicative levels of Affordable Housing for each Neighbourhood to be submitted at the same time but separate from each residential reserved matters application for approval
• Affordable Mix
• Timing of the delivery of the Affordable Units;
• Disposal of Affordable Housing
• Management company & representative body
• Affordable Housing Marketing Plans
• Affordable Housing Viability Reviews throughout the duration of the development including a Late Review
• Nominations protocol and lettings plans
• Developer, Registered Providers and the Council to work collaboratively to ensure service charges for affordable tenants are kept to a minimum. To involve consideration of design and operational arrangements at the appropriate stage.

Transport:

• Financial contribution towards Bus Service Improvement Strategy
• Provision and maintenance of a New River Pier
• New pier to be designed in consultation with TfL including in relation to necessary ticketing and other facilities as part of the Mayor’s River Strategy
• Financial contribution towards for road safety education, way finding signage, cycle training, retail development cycle training, and retail development way finding signage
• Provision of Route Signing
• Implementation of Traffic Orders and CPZ;
• Local road network improvements (on and off site):
  (a) Carry out Highway Works in accordance with agreed programme
  (b) Gateway Junction Improvements
• Any highway works should be secured (and agreed separately with the Highways Authority) by S38 / S278 agreements as part of a Section 106 Agreement and at the developers expense.
• Provision of riverside walkways
• Submission of a Strategic Travel Plan for approval and subsequent implementation and monitoring. Plan should address concerns regarding the future capacity of the Jubilee Line and the resulting need to promote bus and other – River Services, Airline, walking and cycling - transport alternatives.
• Provision of a Car Club – offering free membership to residents for a two year period.
• Provision of segregated cycle facilities in both directions along the length of Edmund Halley Way and good quality connections to the North
• Provision of a signalised Toucan crossing with associated works on Millennium Way at Boord Street
• Upgrade of the cycle path on the eastern side of Millennium Way, including removing obstructions, resurfacing and remarking and linking into the wider cycle network where appropriate
• Financial contribution towards improvements to the Thames Path along the west side of the Peninsula
• End user leases to: 1). Prevent application for parking permits within on site CPZs, and 2). Within car parks - restrict permitted vehicle types, restriction on vehicle related activities (no repairs or refuelling), spaces not to be sold on, observance of signs and line markings and an obligation to inform the managing agent of vehicle details.
• Maintain public access to Drawdock Road and the slipway to the River Thames
• Thames Path to remain accessible to the public at all times during construction works

**Transport Interchange:**
• Enter into a Development Agreement(s) (or Works Agreement) with TfL prior to the submission of the first reserved matters application to deliver the new Transport Hub / Interchange. The Development Agreement must contain the works / construction / delivery programme to ensure that continued operational requirements for London Underground are met. It should also include appropriate clauses in respect of: Transport Hub concourse area over the LU escalators; Taxi Rank (including capacity for 02 events – marshalling and management); Private Hire drop off / pick up (including capacity for 02 events marshalling and management); Kiss and Drop – including capacity needs for 02 event management; Disabled Parking at the Interchange; London Underground operational parking (70 spaces – essential for Jubilee Line train operation); Interchange delivery / servicing arrangements for the station / retail etc, and; cycle parking. The agreement will need to ensure the continued operational requirements of delivering a new bus station and interchange can be achieved minimising the disruption to TfL service.

**New Bus Station**
• Enter into a Development Agreement with TfL prior to the submission of the first reserved matters application for the Bus Station Delivery TfL / TfL buses – approval. The Development Agreement must contain the works / construction / delivery programme to ensure that continued operational requirements for TfL Buses are still met. The agreement will need to
ensure the continued operational requirements of delivering a new bus station can be achieved minimising the disruption to TfL services.

**Bus Network**
- Financial contribution towards Bus Services / future bus network enhancement including agreement of a drawdown mechanism to TfL
- Details of Bus Infrastructure (bus stops locations)

**Commitment to enter into Build Over Agreement(s) with TfL for:**
- Blackwall Tunnel Approach Roads
- Blackwall Tunnel operational requirements including in respect of uninterrupted 24/7 access to vent shaft 4 and the floodgate and the proximity of any new development and how the design of any new development may impact on the Blackwall Tunnel operations.
- Other build over agreements as and when required for any works that oversail TfL infrastructure (e.g. cranes that may oversail the station box / new bus station etc.)

**Silvertown Tunnel Land and Works Agreement(s)**
- Enter into a land and works agreement for the Silvertown Tunnel with TfL prior to any works being implemented within the Silvertown Link Safeguarded Area
- Commitment to work collaboratively with the Council and TfL on all transport related matters

**Employment and Training**
- Commitment, participation and additional financial contribution towards GLLaB.
- Provision of temporary offices for use by GLLaB throughout the construction of the development
- Office floorspace take-up review and monitoring
- Provision of an Equal Opportunities Statement;

**Other**
- Provision of a site in a Serviced Condition for an All Through School
- Financial contribution towards the provision of the All Through School
- Provision of publically accessible swimming pool (6 lane, 25m)
- Provision of a publically accessible artificial sports pitch
- Provision of Open Space
- Offer open space to the Council for adoption with a commuted sum on completion of the development
- Measures for air quality neutral offsetting
• Mitigate impact on PLA Navigational Equipment during construction and operation phases
• Payment of S106 monitoring costs.

Existing Head of Terms which will be rolled forward

• Notification provisions
• Provision of a Consultative Group to ensure that the inclusive needs of disabled people are incorporated within the Development
• Implement the Low Emission Zone and Low Emission Zone Controls
• Submission of Open Space Programme for approval
• Provision, access and maintenance of the Open Space
• Provision of an air quality monitoring station
• Provision of a construction charter;
• Maximise use of the River Thames in relation to construction and freight in consultation with TfL and the PLA
• Construction Haulage Routes
• Provision of an integrated management system
• Provision of a waste disposal strategy
• Links with education providers
• Provision of health care facilities
• Provision of Religious worship and community centre facilities
• Provision of a New Primary School (North) site
• Financial contribution toward/or delivery of a Primary School
• Provision of affordable commercial space
• Safeguarding Greenwich Riverside Transit route

48. Implications for Disadvantaged Groups

48.1 The implications for disadvantaged groups identified below are an integral part of the consideration of the development and community benefits as set out in the report:

• The proposal will secure a range of affordable accommodation for those on limited incomes.
• All new homes will be constructed to Lifetime Homes standards;
• 10% of new housing will be designed as wheelchair standard housing;
• New public open space and facilities will extend to the whole community;
• Access to and within the development for persons with physical disabilities has been addressed in the application;
• The proposal will provide new job opportunities in the construction phase and through non-residential uses;
• New education facilities; and
• Improved public transport services / facilities.

49. Conclusion

49.1 The proposals seek to revisit the 2004 Greenwich Peninsula Masterplan consent and come forward with a new outline Masterplan application that would significantly increase the total number of residential units to be delivered as part of the mixed-use regeneration of the peninsula to approximately 15,720 units.

49.2 The application is for outline planning permission with all matters reserved for future consideration. The application does not seek any approval for the detailed design, external appearance of the proposed new buildings or means of access at this stage. The application submission therefore provides a series of Plans for approval that set the main ‘parameters’ for development and use on the Peninsula. In addition, the documents submitted for approval include the Development Specification, that sets the details of the proposed development, and Design Guidelines. The Design Guidelines set out the guidelines on building form and mass across the Peninsula, building typologies and the urban and public realm environments to be created on the Peninsula. These ‘approval’ documents set the principle parameters and design concepts within which further details would be addressed in zonal masterplans and reserved matters applications to be submitted to RBG for subsequent approval.

49.3 The proposals represent significant social, economic and physical regeneration benefits for the site and the wider area including:

- A new high quality public realm to improve connectivity and accessibility for all.
- New neighbourhoods with green spaces to support healthier lifestyles with extensive opportunities for families to participate in outdoor activities.
- Greatly increased opportunities to use and enjoy the riverside walkway and the fantastic views it offers across the Thames.
- Better interchange between buses and tube services at North Greenwich Interchange whilst encouraging more use of walking and cycling to access the station.
- A range of jobs by developing a strong local economy with a focus on attracting creative industries.
- New schools and community services such as health, learning and training to meet the needs of a growing local population.
- A mix of housing tenures to accommodate a dynamically diverse population.

49.4 The proposed planning application is considered to be acceptable and in accordance with the objectives set out in the NPPF, London Plan 2015 (including MALP), Core Strategy, and other relevant supplementary guidance referenced in section 8 of this report.

49.5 With respect to the school site, whilst the HSE has concluded that it can be developed in such a way whereby the residual risk to children inside the buildings would be insignificant and to those out-of-doors would be very low (provided they were excluded for the open area nearest the gasholder until the hazardous substances consent(s) has been revoked), their advice remains that there are sufficient public safety grounds for permission to be refused for the location of a school on Parcel 18. Therefore the Council, as the Local Planning Authority must decide whether or not to go against the HSE advice.

49.6 Significant risk reduction is possible whereby the residual risk to children inside the buildings would be insignificant and to those out-of-doors would be very low should the scheme be subject to a Grampian style condition restricting development on this site. The recommended Grampian Condition has been included in the recommendation. On this basis officers recommend that Members should approve the application. If the application is approved, it will need to be referred back to the HSE for a decision can be issued.

49.7 Accordingly it is recommended that permission be granted for application reference 15/0716/O, in line with Section 3 of the report.

Background Papers:

Royal Greenwich Local Plan
The Mayor’s London Plan (including MALP)
Supplementary Planning Documents
National Planning Policy Framework
Responses from Consultees
Outline Planning Application ref: 02/2903/O