

Enderby Wharf, Christchurch Way, SE10

22 December 2010

in the London Borough of Greenwich

planning application no. 10/3063/F

Strategic planning application stage 1 referral (new powers)

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

The proposal

Residential-led mixed use redevelopment of an industrial site comprising, 770 residential units, Cruise Liner Terminal, 251 bed hotel, refurbishment and extension of Listed Enderby House into a restaurant/cafe & exhibition/information centre, commercial & retail units, skills academy, creche and Gym

The applicant

The applicant is **Mason Developments Ltd** and the architect is **Ian Simpson Architects**.

Strategic issues

The principle of residential-led **mixed use** redevelopment of this site is acceptable, provided the Cruise Liner terminal is secured as a first phase of development. The applicant has not provided a finalised breakdown of the mix of **housing** on the site, including the proportion of **affordable units**. Therefore the application cannot be fully assessed against London Plan policies. The **architectural quality** is high although further details of the main vehicular access to Blackwall Lane are required. The likely impact of **noise** from the adjacent safeguarded wharf has not been factored into the design. There are a number of **transport** issues which require further clarification.

Recommendation

That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 124 of this report; but that the possible remedies set out in paragraph 126 of this report could address these deficiencies.

Context

1 On 23 November 2010 the Mayor of London received documents from Greenwich Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 3 January 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for

taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B and 1C of the Schedule to the Order 2008:

1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

1B: Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings –

(c) outside Central London and with a total floorspace of more than 15,000 square metres.

1C: Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met –

(a) the building is more than 25 metres high and is adjacent to the River Thames.

2C: Development to provide –

(i) a passenger pier on the River Thames.

3E: Development —

(a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated and comprises or includes more than 2,500 sq.m of C1(hotel) floorspace.

3F: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.

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

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

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

Site description

6 Enderby Wharf is a 3.6ha site fronting the river Thames within the London Borough of Greenwich. It is located on the west side of the Greenwich Peninsula, approximately half way between the O2 centre and Greenwich Town Centre/Royal Naval College (approx 1200m in either direction). The site is in the Greenwich Peninsula opportunity area. It is bounded to the north by the Tunnel Glucose Wharf (a wharf safeguarded for river freight but currently not operational), to the east by the remaining operational part of the Alcatel works and some traditional Victorian 2 storey residential properties, to the south by some more traditional Victorian 2 storey residential properties and the emerging predominately residential development of Lovells Wharf and to the

west by the River Thames. The site is roughly rectangular in shape with a spur leading eastward to Blackwall Lane (A2203) to enable vehicular access.

7 Whilst the safeguarded wharf to the north is not currently operational, it is expected to re-commence wharf operation in line with the Mayor's wharves policy.

8 Vehicular access to the site is currently from Blackwall Lane and from Christchurch Way. The site is located adjacent to the A102 Blackwall Tunnel, which forms part of the Transport for London Road Network (TLRN). The nearest part of the Strategic Road Network (SRN) is the A206 Trafalgar Road, which is 500m to the south. The closest bus stops to the site are on Blackwall Lane, serving routes 188 and 422. The nearest stations are North Greenwich, served by the London Underground Jubilee Line, located 1.4km to the north of the site and Maze Hill, served by national rail, located 900m south west of the site.

9 The site has a public transport accessibility level (PTAL) of 3 on a scale of 1 to 6, where 6 is most accessible.

Details of the proposal

10 The proposed residential-led mixed use development comprises:

- Residential development - 770 units - (breakdown of affordable still subject to viability - see indicative allocation at 31% affordable)
- Cruise liner terminal 17 312 sq.m
- Hotel - 251 bed (14 474 sq.m)
- Refurbishment and extension of Listed Enderby House into a restaurant/cafe & exhibition/information centre - 733 sq.m
- Commercial & retail units - 594 sq.m
- Skills academy - 580 sq.m
- Creche - 251 sq.m
- Gym - 304 sq.m

11 The development is laid out in 8 Blocks (A-H) plus the cruise liner terminal and jetty, the hotel and the renovated Enderby House. Existing ground levels are generally between 2.00m AOD - 2.50m AOD on adjacent streets. Building heights vary but the tallest block (Block A) rises to 53.7m AOD – giving an effective height of approximately 51m to the 14th storey roof line. Block H is a small 2 and 3 storey block containing 6no. dwellings intended to match the scale of adjacent Victorian terraced houses. There are two decks of car parking below the residential element of the development (Blocks B-H) and three decks below Block A and the hotel.

12 The development is generally significantly taller than its surroundings. However, Block H is similar in scale to adjacent terraced housing and the proposals are a similar scale to the consented development at Lovells Wharf to the immediate south. To the east and north land uses remain industrial, with a safeguarded wharf to the north. The scale presents a defendable boundary to these uses.

The proposed layout is shown in figure 1 below:

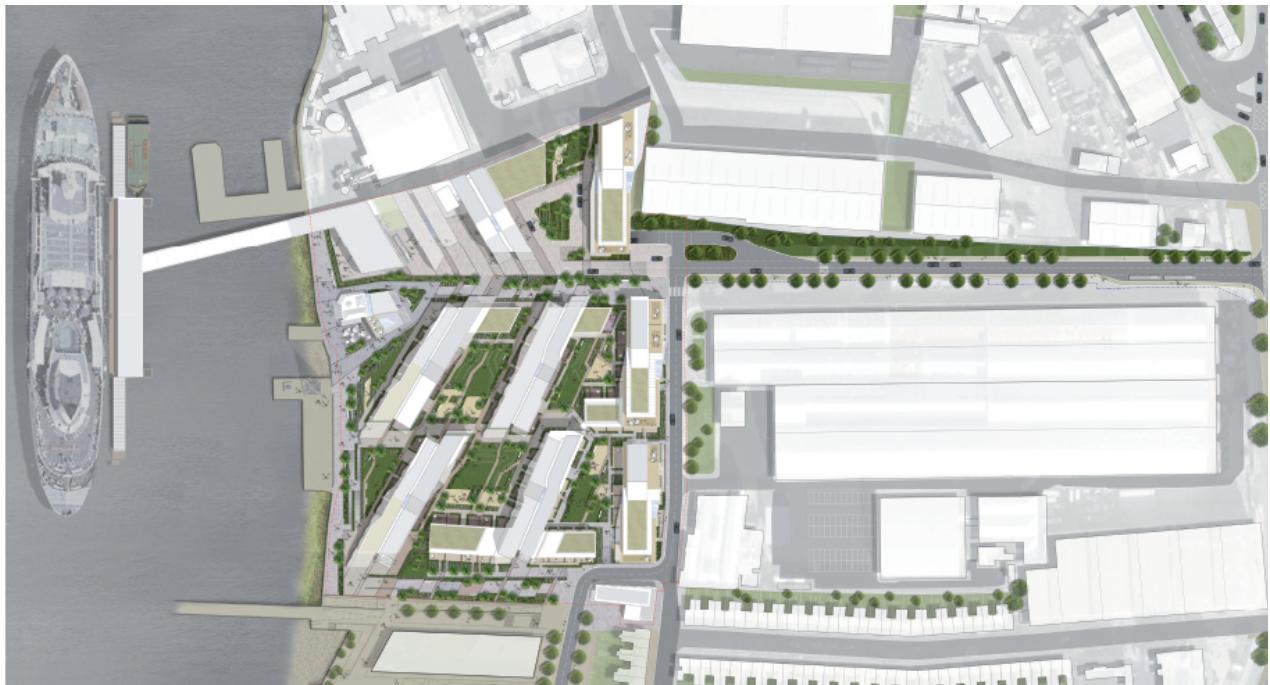


Figure 1: site layout

Case history

13 Pre application meetings have been held with the GLA on the 28 Sept 2009 and 19 August 2010 and the applicant gave an informal presentation to the Mayor on 20 Oct 2010. In addition the applicant has had pre-application meetings with TfL, Greenwich Council and have made three presentations to CABE.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- | | |
|------------------------|---|
| • Mix of uses | <i>London Plan</i> |
| • Urban design | <i>London Plan; PPS1</i> |
| • Tall buildings/views | <i>London Plan; RPG3A, Revised View Management Framework SPG</i> |
| • Access | <i>London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i> |
| • Housing | <i>London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EIP draft</i> |
| • Affordable housing | <i>London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EIP draft</i> |
| • Density | <i>London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EIP draft</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; PPG13;</i> |
| • Parking | <i>London Plan; the Mayor's Transport Strategy; PPG13</i> |
| • Climate change | <i>London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate</i> |

- Blue ribbon network

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Greenwich Unitary Development Plan 2006 and the London Plan (Consolidated with Alterations since 2004).

16 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- The Draft Greenwich Core Strategy (currently out to consultation)

Principle of development and mix of uses

17 The development proposals are contrary to existing London Plan and local development plan designations. The proposals are for a residential led mixed use scheme. Uniquely in London, the proposals include the provision of a Cruise Ship Terminal with capacity for 1no. cruise ship to berth and space for 2no. Thames Clipper berths. The proposals also include a hotel, gym, training workshops, creche and a visitor centre/restaurant/bar. While the principle of the development would not generally be acceptable due to the land use designation, the addition of the cruise ship element leads to a balanced consideration of the merits of the scheme.

Strategic Industrial Land/Employment/Cruise Ship Terminal

18 The site lies within the Greenwich Peninsula West Strategic Industrial Location (SIL) identified in the adopted London Plan, see map 5D.1, and is a Defined Industrial Area in the local development plan. London Plan policy 5D.2 and draft replacement London Plan policy 2.10 set out strategic priorities for SIL.

19 The borough of Greenwich is classified in the Industrial Capacity SPG as lying within the 'limited' category for industrial land release with an indicative benchmark of 15ha for the period 2006-2026. Recent evidence indicates that a total of 14.4 ha of industrial land has already been released in Greenwich 2006-2010 (source: URS/DTZ London Industrial Baseline, LDA/GLA 2010). The proposals at Enderby Wharf (3.6ha) would increase the level of release in Greenwich to 18ha, marginally above the 20 year benchmark.

20 In the wider South-East sub-region consisting of the boroughs of Bexley, Bromley, Lewisham, Southwark and Greenwich, a total of 53.8ha has been released over the period 2006-2010. This lies well within the 2006-2026 benchmark of 146ha but there are already emerging proposals in other borough LDFs within the sub-region for a further 97ha of industrial land release (not including Greenwich) over the planning period which, when added to the 53.8ha already released, would exceed the sub-regional benchmark by about 5 ha. The release of the Enderby Wharf site, when combined with other known proposals for industrial land release in the sub-region, would make the supply-demand balance of industrial land tight.

21 If the principle of SIL release were to be found acceptable, the applicant would still need to clearly demonstrate that the proposals would not adversely effect the existing or potential wharf operations or industrial and employment-generating activities. It is not immediately clear from the Planning Statement or the Employment Land Study that they will achieve this. The siting and orientation of the residential properties will be particularly important to ensure that they will not undermine the efficient operation of the nearby safeguarded wharf and the industrial businesses in the wider Strategic Industrial Location.

22 The delivery of 365 full time jobs once operational (approx. 100 jobs per hectare) is a reasonable level of employment that might be expected from such a site and the inclusion of a skills academy is welcomed.

23 In 2008-9 the LDA and GLA commissioned research into the cruise liner market in respect of London. The research is available on the GLA website at <http://www.london.gov.uk/who-runs-london/mayor/publications/planning/assessment-current-and-future-cruise-ship-requirements-london> It indicates that London is a potentially attractive market for cruise ships, however it also has drawbacks of a relatively long journey time up the Thames from the open sea and a lack of suitable cruise liner berthing facilities. The report indicated that around 45-50 additional cruise ship visits could be attracted to London, if a suitable berthing terminal were available in an appropriate location.

24 The report examined potential locations for a terminal and found that there were only three suitable sites, Enderby Wharf, Delta Wharf and the Royal Docks. Enderby Wharf is one of the potentially suitable sites given its existing and self-scouring deep water, relatively close proximity to central London and the proximity of the Maritime Greenwich World Heritage Site as an additional draw/setting.

25 The Draft Replacement London Plan (DRLP) indicates the importance of extending the benefits of tourism across the capital and reducing pressures on central London and that "options for a cruise liner terminal in an appropriate location such as Greenwich should be explored..." (DRLP para 4.27). Note that 'Greenwich' was clarified as meaning 'Greenwich Peninsula' in the Mayor's Further Suggested Changes to the DRLP issued during its Examination in Public.

26 London Plan policy 3D.7 *Visitor accommodation and facilities*, is also relevant. It seeks to achieve 40,000 net additional hotel bedrooms by 2026, stating that '*beyond the CAZ, identify capacity for new visitor facilities in town centres and other locations such as Opportunity Areas, with good public transport access to central London and international and national transport termini*'. The proposed (180 hotel rooms) 251-room hotel will contribute to the provision of hotel accommodation in an Opportunity Area, which whilst not having especially good public transport does have the particular link to the Cruise Liner terminal and will have two berths for Thames Clipper services. As such the proposals are consistent with this policy and this aspect of the Draft replacement London Plan policy 4.5, is broadly similar in its approach, although at the EIP discussion on this point an additional clause was suggested to be added to para 4.28 to recognise the potential impact that apart-hotels could have on housing capacity.

27 There are no other known current proposals for a cruise facility in London, although it is understood that the Port of Tilbury, a relatively short distance outside London has recently upgraded its cruise facilities. The applicant has indicated that it anticipates up to 100 cruise ship visits per year to the proposed terminal. This would represent approximately 300% growth on current levels. Given this level of growth, it is a concern that the proposal is only for a single berth. The applicant should demonstrate how more than one vessel could be handled at any one time.

28 Overall, taking into account the policy context and the merits of the proposal, this specific release of industrial land could be considered to be acceptable as long as the following requirements are met:

- The applicant demonstrates that the development will not have an adverse impact on the remaining SIL, including the safeguarded wharf to the north of the site

- That the operation of the cruise liner terminal has some backup capabilities for times when more than one vessel seeks to call at London
- Any planning permission must secure the cruise facility as the first phase of any development, for example by use of a S106 agreement or Grampian type planning condition

29 Greenwich Council should note that the release of Enderby Wharf, would result in a significantly reduced likelihood of further SIL sites in the borough being released, at least up to 2020, as the borough will have released land over its benchmark level.

Urban design and strategic views

30 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained in Chapter 4B. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in Chapter 4B and elsewhere in the London Plan include specific design requirements relating to tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network amongst other matters. Chapter 7 of the draft replacement London Plan sets out design related policies.

31 The London Plan is clear that the starting point for design in locations such as this is the water and the relationship between this and the site. In this case the site has a long history of association with the River Thames having been a working wharf with long maritime connections, this has left a legacy of associated structures and buildings, including Enderby House (listed grade II). The proposals for the site generally embrace and celebrate this legacy, which is welcomed.

Layout and form of buildings

32 The proposed layout, though irregular in plan, has much to commend it and would generally support the prevailing movement patterns in the area. In particular it would create a generous riverside space incorporating Enderby House, which would support the reuse of this building and the use of the riverside path. It would maintain and enforce the alignment of Christchurch Way and connect this, and Banning Street, with perpendicular streets running to the riverfront. This would form a discrete urban block, well proportioned in terms of the wider urban grain and presenting residential entrances and active ground floor uses to the public routes on all sides. The internal planning of this urban block is more irregular with the arrangement of individual blocks being driven by orientation to the river and sun. The internal communal amenity spaces this creates would nonetheless be well proportioned in relation to the scale envisaged and the area required for amenity in a scheme of this size.

33 The positioning of the hotel and cruise ship terminal against the safeguarded wharf to the north of the site is sensible, given the associated amenity issues. It is notable that the noise assessment appears to be based on a non operational wharf at Tunnel Glucose to the immediate north of the site. As a safeguarded wharf, this site is expected to come back into wharf cargo handling use and will therefore be a source of noise. The applicant should provide further design and supporting acoustic analysis to satisfy officers that the design of the hotel, cruise terminal and residential Block A, adjacent to the safeguarded wharf on the northern boundary, would be satisfactory in terms of amenity and avoid prejudicing the ongoing operation of the safeguarded wharf for wharf related uses. Furthermore this analysis should ensure that the landscaped area between Block A and the hotel does not allow noise to impact further into the site. If this cannot be proven then the design of this area should be reconfigured.

34 Block A has been amended from pre-application layouts to enable a potential route to the area to the north of the application site, should that be proposed in the long term (+20years). It is

worth stressing that the current SIL and wharf uses are not expected to change in the foreseeable future, especially given the shortage of industrial land in Greenwich and the valuable strategic role of river wharves.

35 The proposed route running east from the Christchurch Way to Blackwall Lane clearly presents a number of design challenges as, whilst it is positive in terms of improving connections to the east, it will be largely flanked by the blank facades of existing industrial buildings which are set to remain for the foreseeable future. The public realm treatment, especially the lighting, and the management plan should ensure that this area attains an adequate level of amenity and security for users. The applicant should ensure that this and all other routes proposed connect with the existing routes in the area, including Christchurch Way and Banning Street, to allow easy and direct vehicular and pedestrian movement through the area and support its legibility. It is disappointing that more detailed landscaping drawing have not been provided for this difficult area. The Council should ensure through the addition of conditions that the design of this area would meet these objectives and attain an appropriately high level of design quality.

36 The proposed disposition of scale and massing across the site is well considered and would both integrate with that of existing and emerging development to the south and east and present buildings of a scale commensurate with the River at this point. The decision to develop an integrated series of medium rise blocks rather than taller tower structures is supported in this location. The treatment and enclosure of Christchurch Way is particularly well handled.

37 The architecture and materials selection aims to authentically reflect the industrial and wharf character of the site and the riverside location, this is a positive feature. The treatment of the cruise ship terminal as a discrete and distinctive architectural entity, whilst being mindful of the setting of Enderby House, is appropriate. The concepts for this are encouraging and the locality offers a wealth of inspiration in terms of river-based structures for the design team to work with.

38 Whilst final housing mix is still awaited, the consideration given to residential quality, particularly in terms of dual aspect units and the arrangement of cores, is welcomed. The applicant should note the existing and emerging strategic planning policy and guidance on residential design quality and ensure that this is reflected in the proposed scheme.

39 The application drawings indicate that the development will have limited appearance from Greenwich Park and proposals are similar in scale to the Lovells Wharf development to the south, whilst Block H is similar in scale to adjoining Victorian terraced housing.

40 The restoration, extension and new uses for the Listed Enderby House are welcomed in principle as a positive re-use of an historic building, although this report does not comment on the details of the Listed Building proposals.

41 In summary the proposal would be well designed and wholly consistent with the design policies of the London Plan including London Plan policies 4B.1, 4B.10 and 4B.11.

Inclusive design

42 London Plan policy 4B.5 and draft replacement London Plan policy 7.2 require all future development to meet the highest standards of accessibility and inclusion, and requires design and access statements submitted with planning applications to explain how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be managed and maintained. The design and access statement explains how inclusive access has been incorporated into the scheme, including the public realm, non-residential uses, parking and residential accommodation. However the access

statement has not provided sufficient detail to establish compliance with the policy, as recommended in the pre application report.

43 Creating an accessible public realm is challenging on this site due to the substantial level changes between the flood defence level and the adjacent existing streets. It appears that the level changes across the site have generally been handled sensitively and the access statement states that gradients will not exceed 1 in 21, but it would be helpful to have larger scale plans that illustrate the various gradients on all the routes to and through the site as the access overlays do not provide sufficient detail to establish that these routes are fully accessible.

44 The design of the routes from the cruise liner and Thames Clipper should be designed to ensure easy and safe access for disabled people, aiming for the gentlest gradients achievable given the nature of the structure and the extensive tide here. Given the numbers of people disembarking at any one time and the likelihood of high proportions of older people many of whom may be disabled and mobility impaired the number, location and size of lifts, the design of the stairs and ramps and the provision of resting points along the long corridor routes should be carefully designed to ensure inclusive access.

45 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The pedestrian routes to all of the different buildings on the site should be designed to ensure full and easy access for all users. The proposed approach to the public realm – creating a clear route through the site to the hotel and terminal with clear views of the cruise liners from Blackwall Lane, opening up the public realm beside Enderby House and enabling the riverside walk to extend to adjacent sites in future is welcome and helps to provide a logical, permeable and easily navigated development.

46 The routes through to the residential entrances should be equally logical – especially important to visually impaired people. Providing clearly identified entrances at street level can help to make access easy, safe and comfortable for everyone, particularly for disabled people. Further details of how disabled people access each of the buildings safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc should be submitted. There are a number of areas shown on the submitted plans that give rise to concern over whether the most inclusive solution has been achieved. For example it appears that an external lift is required within the public realm to reach the residential amenity space (access overlay 4). The provision of external lifts within the public realm is not ideal given the potential problems of vandalism and lift breakdown – non mechanical means of access is always preferred. If there is no non-mechanical alternative step free route details of a management plan to ensure access is maintained here should be submitted.

47 The pier has been designed to achieve a maximum gradient of 1 in 12 on the linkspan (access ramp) at low tides but most of the time will be shallower than this, with management arrangements in place to provide assistance when needed. The pontoon walkway will be covered providing protection from inclement weather which is welcomed. It may be appropriate to incorporate a 'dog spending area' in the public realm in the vicinity of the cruise liner terminal for use by passengers with guide dogs or assistance dogs disembarking from the cruise liners and the Thames Clipper.

48 The provision of accessible hotel bedrooms is welcomed but further information is required to ensure compliance with Policy 4.5 of the draft replacement London Plan. The policy supports an increase in the quality and quantity of fully wheelchair accessible visitor accommodation and asks for at least 10% of new hotel bedrooms to be wheelchair accessible. The access statement states that 5% will be provided from the outset and 5% will be 'capable of being easily adapted at a later date'. The applicant should clarify the number of wheelchair

accessible hotel bedrooms to be provided from the outset and should submit plans showing the layout of these rooms and of the rooms that will require adaptation to make them fully accessible in the future, to establish whether this approach meets the policy aim of 10% wheelchair accessible accommodation.

49 The policy also encourages applicants to submit an Accessibility Management Plan which sets out how the continuing management of the hotel will ensure the accessible rooms are maintained and managed, helping inclusive access to become part of the overall operation and business of the hotel (in a similar way that travel plans can ensure a commitment to sustainable travel patterns after occupation). This could be secured by condition. The provision of a 'Changing Places' WC in the hotel is welcomed and should also be secured by planning condition.

50 The commitment to extend and alter Enderby House to ensure it is accessible to disabled people is welcomed - the detailed design of this should be conditioned to ensure the accessibility outlined in the access statement is achieved.

51 London Plan policy 3A.5 (Policy 3.8 of the draft replacement London Plan) requires all new housing to be built to Lifetime Homes standards and ten per cent to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The access statement states that the design of the new homes will be to the Lifetime Home standards as set out in the Code for Sustainable Homes in May 2009. Further clarification is required to establish that the proposal meets the Lifetime Home standards as updated and revised by Habinteg Housing Association in July 2010 (see www.lifetimehomes.org.uk) as these are the standards that should be applied. This will need to be addressed prior to any Stage 2 planning referral by the submission of typical flat layouts that demonstrate how each of the 16 Lifetime Homes criteria have been addressed. It should be clear on the plans where the wheelchair accessible flats are located and how many there are. These should be distributed across tenure types and flat sizes to give disabled and older people similar choices to non disabled people.

52 The access statement states that parking for disabled people will be provided but does not illustrate this clearly on plan. Details of the number of suitably located and clearly designated Blue Badge parking bays for staff and visitors to the hotel, cruise terminal, residential accommodation and the other commercial uses should be provided. The provision and future management of the blue badge bays should take into account demand from blue badge holders who occupy the Lifetime Homes and who occupy the wheelchair accessible homes and should address the needs of disabled visitors. This should be addressed in the parking management plan and secured by condition. The travel plan should also address the specific access needs of disabled people and older people.

Blue ribbon network and flood risk

Blue ribbon network

53 The policies contained within chapter 4C of the London Plan are relevant given this site's riverside location. The policies seek to capitalise on the water and ensure that it is used. The delivery of a cruise liner terminal and twin berth Thames Clippers are compliant with this aim, in particular within Policy 4C.7 and DRLP policy 7.25 which has a particular reference to cruise ships following the LDA/GLA commissioned research referred to above.

54 Policy 4C.3 (DRLP Policy 7.28) seeks to protect and enhance the biodiversity value of the blue ribbon network, the proposals include the provision of additional inter-tidal habitat, so this aspect of the scheme is welcomed. Policy 4C.11 (DRLP Policy 7.27) seek to improve access to and

along the Blue Ribbon Network. The proposals will result in a significant improvement to the Thames Path, this is welcomed. One of the less common aspects of the current site is that it offers the opportunity for people to use steps to access the Thames Foreshore, this is supported by Policy 4C.11 and more explicitly in DRLP Policy 7.27, it is unclear how the current proposals will continue and/or enhance the stepped access to the foreshore. There are also existing structures into the river, in line with London Plan policy 4C.11 & 4C.12, these should be retained and made publicly accessible. Again it is not clear to what extent this is the case with the current proposals.

55 The development is adjacent to the Tunnel Glucose safeguarded wharf to the north. The proposals in general present a defensible boundary to this wharf, which is expected to remain in use as an operational wharf for the foreseeable future. However, there is some concern that the open space between the hotel and Block A may allow for noise penetration from wharf operations into the site. The Port of London Authority has been involved in the navigational discussions regarding the cruise vessels, with a particular aim of ensuring that these would not prejudice the use of Tunnel Glucose for freight. At present it is understood that this has been resolved but the Mayor has not seen any written acceptance of this point.

56 Given the site's location adjacent to the Thames, the river should be used for the transportation of bulk building materials, demolition waste and excavated material in line with London Plan policy 4C.8 (DRLP Policy 7.26), this should be secured by planning condition.

Flood risk

57 The site is located within flood zone 3a and benefits from the protection of the River Thames flood defences. A Flood Risk Assessment has been prepared by Water Environment Ltd.

58 The development proposals show that the flood defence line will be raised to 5.83m AOD and set back further from the river edge. This is welcomed and is in line with London Plan policy 4A.13 (DRLP 5.12). It is recognized that on some occasions this may result in temporary inundation of the Thames Path.

59 The main development will take place on a raised platform set at 5.83mAOD, and will therefore have a very low level of flood risk. However, some properties fronting Christchurch Way, and a parking level will be set at the lower ground floor level of between 2.15- 2.58m AOD, with a further level of car parking set at basement level (-1.30,AOD) and a further level of parking under the hotel having a floor level of at -4.90m AOD. In the event of a flood, these levels could be subject to water depths of several metres. It is also noted that there are areas of plant and lift shafts to these floors. The continued operation of such services will be required by all of the levels above in the event of a flood. Therefore the applicant should further investigate how the development would cope in the albeit unlikely event of a flood. In particular attention should be given to flood warning procedures, means of escape, ability to recover/pump out and flood proofing of plant that will be required to remain operational.

60 The Flood Risk Assessment states that the surface water from the development will be kept separate to foul water and directed into the Thames via two new outfalls, rather than connected to the existing combined sewer system. This is welcomed and is in line with The sustainable drainage hierarchy in London Plan policy 4A.14 (DRLP 5.13).

Housing

61 London Plan policy 3A.1 seeks to increase London's supply of housing and sets a London-wide target of 30,500 additional homes per year between 2007/8 and 2016/17. Table 3A.1 sets borough housing targets, of which Greenwich is 2010 additional homes per year between 2007/8

and 2016/17. Draft replacement London Plan policy 3.3 seeks provision of at least an annual average of 33,400 additional homes across London up to 2015/16. Table 3.1 sets annual average housing provision monitoring targets for London boroughs, of which Greenwich is 2 595 units.

Affordable housing

62 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

63 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

64 Policy 3.13 of the draft replacement London Plan sets out the approach to negotiating affordable housing on site, and states that "*The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes*" taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development, and viability.

65 Also relevant is London Plan policy 6A.4 *Priorities in planning obligations*, which states that affordable housing and public transport improvements should generally be given the highest importance with priority also given to tackling climate change, learning and skills and health facilities. Draft replacement London Plan policy 8.2 *Planning obligations* states that affordable housing; supporting the funding of Crossrail where this is appropriate; and other public transport improvements should be given the highest importance.

66 The applicant has not, at this stage, proposed a level of affordable housing for consideration, but has acknowledged the need to submit a viability assessment and to contribute towards affordable housing. The Council is understood to be in the process of commissioning consultants to undertake a review of the applicant's viability assessment. The outcome will be reported at stage two. Given the scale of the development and likely phasing, a review mechanism is likely to be required.

Mix of units

67 London Plan policy 3A.5 requires new development to offer a range of housing choices in terms of the mix of housing sizes and types, taking into account the housing requirements of different groups. In support of this policy, the London Plan Housing supplementary planning guidance seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.12 of the draft replacement London Plan states that within affordable housing provision, priority should be accorded to family housing. Also relevant is policy 1.1C of the London Housing Strategy, which sets a target for 42% of social rented homes to have three or more bedrooms.

68 The proposed development includes 770 residential units, comprising:

- 49 studio units
- 239 one-bed units
- 278 two-bed units
- 154 three-bed units
- 37 four-bed
- 9 five-bed
- 4 six-bed units

This will make a positive contribution to total housing supply. However at present the breakdown of housing provision and level of affordable housing provision has not been finalised but is the subject of on-going negotiations between the applicant and Greenwich Council. The outcome of these discussions are likely to be available in January 2011 and will need to reflect the Mayor's policies as set out above.

Housing density

69 London Plan Policy 3A.3 outlines the need for development proposals to achieve the highest possible intensity of use compatible with local context, the design principles of the compact city, and with public transport accessibility. Table 3A.2 of the London Plan provides guidelines on density in support of policy 3A.3. Draft replacement London Plan Policy 3.4 states that density should be optimised within the relevant density range shown in Table 3.2.

70 The site has a public transport accessibility level of 3, (which may rise to 4) and is in an urban setting. The currently proposed layout is for 770 units with 2243 habitable rooms. For the purpose of assessment against the density matrix and London Plan policy 3A.3, and taking account of the mixed use nature of the development, the applicant should specify scheme density based on net residential site area (i.e. excluding non-residential floorspace) using the 'Greenwich' method.

71 The density will be above the London Plan Density matrix, as even on a total site area (ie including the non-residential floorspace, density is 214unit/ha or 623 habitable rooms/ha. For such a development to be acceptable, it must be of exceptional design quality and in particular having regard to the Mayor's Housing Design Standards.

Housing Design

72 Policy 3.5 of the draft replacement plan introduces a new policy on the quality and design of housing developments. Part A of the draft policy states that housing developments should be of the highest quality internally, externally and in relation to the wider environment. Part C of the draft policy states that new dwellings should meet the dwelling space standards set out in Table 3.3, have adequately sized rooms and convenient and efficient room layouts. Part E of the draft policy states that the Mayor will provide guidance on implementation of this policy including on housing design for all tenures. The reasoned justification provides further guidance and explanation. In particular paragraph 3.31 states that other aspects of housing design are also important to improving the attractiveness of new homes as well as being central to the Mayor's wider objectives to improve the quality of life of Londoner's environment. To address these the Mayor will produce a new draft Housing SPG on the implementation of Policy 3.5 for all housing tenures, drawing on his design guide for affordable housing. Paragraph 3.33 highlights what the proposed SPG would cover, in terms of requirements for individual dwellings.

73 Prior to any Stage 2 referral the applicant should set out whether the scheme meets the Mayor's Housing Design Guide. For example the 4 bed wheelchair unit illustrated on page 120 of

the design & access statement only has one living/dining/kitchen room in a 4 bedroomed flat, but the Mayor's Housing Design Guide requires two living spaces if there are 3 or more bedrooms - see page 52 standard 4.4.3. Further consideration should therefore be given to re-designing this unit accordingly.

Children's play space

74 Policy 3D.13 of the London Plan sets out that "*the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.*" This is supported by Policy 3.6 of the draft replacement London Plan.

75 The provision of playspace within the development is particularly important as there is relatively little provision in nearby areas. The planning statement sets out that the development is expected to yield 380 children consisting of:

Age group	No. of children	SPG requirement sq.m	Proposed
0-4 year olds	133	1330 sq.m	1558 sq.m
5-10 year olds	120	1200 sq.m	1813 sq.m
11-15 year old	127	1270 sq.m	1282 sq.m
Total	380	3800 sq.m	4653 sq.m

The figures will need to be revisited in accordance with the final unit mix and affordable housing provision, as unit size and tenure will affect child yield and the corresponding play space requirement. It is somewhat questionable whether some of the spaces for 11-17 year olds, notably the small areas fronting the river or along the northern east-west access, can really be designed for this group.

Transport

76 The site is estimated to have a moderate level of accessibility with a Public Transport Accessibility Level (PTAL) of 3, out of a range of 1 to 6 where 6 is excellent. Despite initial comments raised on the methodology presented in the Transport Assessment, TfL remains of the view that the PTAL calculations might still be overstated. While from a transport terms, it might not make a significant difference, given that proposed densities on site are however based on a PTAL of 4, the applicant ought to ensure that such accessibility is achievable on site.

Car Parking & Access

77 726 car parking spaces are proposed to be provided in two car parks. Although TfL welcomes the applicant's commitment to provide a car parking management plan, to be secured by condition, clarification should still be provided as to how this parking will be managed and allocated across the different land uses in order to assess its suitability. As it appears that none of the parking will be dedicated to the cruise terminal, it could be assumed that the majority of the spaces will be for the residential use. As previously stated at pre-application stage, provision could be as high as 0.8 spaces per dwelling, which is considered excessive. In accordance with London Plan policy 3C.23 '*parking strategy*' and to minimise additional congestion on the adjacent highway network, which is particularly an issue as already significantly operating above capacity throughout the whole day, TfL therefore strongly recommends that parking levels are reduced. Not only car parking should be consistent with neighbouring developments, the applicant needs to be aware that given the site's proximity to the A102, traffic impact of the

proposals will be particularly scrutinised at implementation stage by TfL through notifications under the Traffic Management Act.

78 In order to encourage the use of more sustainable modes, and to minimise vehicle trip generation, TfL would also encourage that future residents are prevented from having access to on street parking permits. This has now been agreed by the applicant and will be secured by way of an appropriate condition. Similarly TfL welcomes the provision of electric vehicle charging points, also to be secured by condition, in line with policy 6.13 'Parking' of the draft replacement London Plan.

79 General access to the site is proposed from a relocated entry onto Blackwall Lane. A revised layout of the junction, considering TfL's initial request for relocating the existing yellow box to protect the access, along a swept path analysis demonstrating that that a 15 m coach can access the site safely, have recently been provided. Whilst this is welcomed and the outline design considered acceptable in principle, subject to satisfactory safety audit, an all movements drawing should however be provided before confirming its acceptability. Demonstration that there is sufficient space to accommodate a coach and bus waiting in the right turn pocket, approach and exit to the north; that the yellow box and bus line markings comply with guidelines; and that bus lane widths are acceptable, are therefore outstanding and should be addressed to ensure that combined with increased traffic flows, such access will not negatively affect the TLRN.

80 Access from Christchurch Way will need to be retained for access into the existing neighbouring Alcatel factory site. It should be barrier controlled to ensure that general traffic will not be able to use it, but designed so that safe and convenient access for cyclists and pedestrians is retained, alongside providing safety measures such as CCTV. The applicant has now confirmed that the detailed design and management of this facility will be secured by way of an appropriate condition, which is acceptable.

Trip Generation and Mode Split

81 Details comments were provided in TfL's initial letter sent to the applicant on 19 November 2010. The trip generation for the non-cruise elements is accepted overall. The outcome of the modal split presented was however questioned as the underground mode share was higher than what would be expected from a site more than 1km away from an underground station. TfL therefore welcomes the consideration recently given to the assumption that trips to North Greenwich station would be made by bus and as a result, it is accepted that there will be no further impact on bus trip generation, considering the development on its own.

82 Trips for the cruise terminal element of the development have been calculated based on information provided by the current operators within the Port of London Authority. TfL had a number of concerns about the underlying assumptions used in this assessment as London Central Cruise Moorings currently operate at sites which have a higher PTAL than Enderby Wharf and are within 500m of a tourist attraction. Therefore TfL advised that care needed to be taken when using the trip rates and mode share derived from these sites. Despite the supporting information recently provided, justification should still be provided to demonstrate the appropriateness of these assumptions.

83 TfL previously queried the zero trip rate for the ship crews and the assessment of tourist trips which appears to be based on the assumption that only one set of visitors will arrive or depart in one a day. While the additional information provided address some of TfL's concerns, it does not however answer the query regarding the likely number of cruise ship visits a day.

Walking and Cycling

84 It is understood that in accordance with pre application advice, a pedestrian audit of the area around the site was undertaken. This should be submitted to enable TfL to understand the baseline pedestrian conditions around the site and to identify specific areas for improvement. This has recently been discussed with the applicant who has subsequently agreed that it will be dealt by way of condition in consultation with TfL. Whilst this is accepted, securing the necessary works should also be dealt with satisfactorily.

85 The improvements to the Thames Path are nevertheless welcomed. However, TfL questions whether the existing route will need to be closed during construction as this should be considered and mitigated as part of any construction logistics plan. In order to improve wayfinding and to encourage walking in accordance with London Plan policy 3C.21 '*Improving conditions for walking*' a contribution of £3,200 towards improved signing of the route is requested. This has now been accepted by the applicant and should be secured in the s106.

86 The provision of secure cycle parking is welcomed and in order to ensure compliance with London Plan policy 3C.22 '*improving conditions for cycling*' and draft revised London Plan policy 6.9 '*cycling*' provision for the residential units should be increased to two spaces for any 3+ bedroom units. Whilst the applicant is currently reassessing the provision, it was suggested that this could also be controlled by condition. Identifying necessary space should however still be provided.

Highways Impact

87 To partially mitigate against the impact of the development on the highway network, timings at the Blackwall Lane/Woolwich Road junction have been altered from those on street. Whilst this is accepted by TfL, a contribution of £5k was requested in order to duplicate these timings on street. This has now been agreed by the applicant and should be secured via the s106 agreement.

88 It is also noted that the Blackwall Lane/A102 onslip is operating over capacity in all the scenarios that have been modelled. Whilst it is accepted that the development will only have a minor impact above the base situation, this can have a significant effect when a junction is operating above capacity. As set out above, it is therefore considered essential that car parking levels are reduced in order to minimise the impact on the Blackwall Tunnel which is a key strategic route.

Public Transport

89 TfL initially considered that the assessment had not considered the impact of additional bus trips to access rail stations. The impact of this on bus capacity needed therefore to be considered before TfL can determine whether a contribution was considered necessary. From the additional information submitted, it is now accepted that the majority of bus trips, including London Underground passengers will be accommodated on the local bus network and that trips to Maze Hill station will be mainly on foot.

90 TfL has completed an audit of all bus stops in London to establish which conform to accessible bus stop guidelines. There are four bus stops that are likely to be used to access this development; two on Blackwall Way and two on Christchurch Way. Three of these require works to bring them up to current accessibility standards as such. A contribution of £30,000 was requested towards these works, including raising kerb heights and the introduction of bus stop clearways. This has now been agreed by the applicant and should be secured via s106.

91 As previously advised, TfL is working with the Greenwich Council to deliver public transport improvements for the area. The layout of the proposed development should therefore

ensure that a public transport corridor can be introduced through the site in the future and that is should provide continuity with the agreed design for the adjacent Lovell's wharf scheme. This has now been confirmed by the applicant who has also agreed to a condition which could allow bus penetration through the site if cumulative demand arising from the western Peninsula development sites identifies a need in the future. TfL would therefore welcome further discussion on this matter, including the potential for future pooling bus patronage in the context of cumulative impact.

92 Notwithstanding the comments about trip generation, TfL welcomes the assessment of predicted demand at North Greenwich Station for the Jubilee line. The station has sufficient capacity to deal with the morning outbound flows. Furthermore, the Jubilee line upgrade will be completed ahead of the opening of the development and it is therefore expected that there should be sufficient line capacity. TfL does have some concern however, that there may be insufficient capacity to deal with the demand for private hire/taxi trips at this interchange, as further detailed below.

93 As advised to the applicant, Greenwich DLR station is located 1.7km from the site and therefore it is considered unlikely that there would be a significant impact on its capacity.

94 TfL is satisfied that the assessment considers the impact of the development rail services. Given the small number of national rail trips that are likely to be generated and the high frequency of rail services through Maze Hill, the effects of the development on this station and services will be manageable.

Coaches

95 Whilst TfL welcomes the coach facilities that have been identified as part of this development, there is concern that the number of coach trips has been underestimated. As raised with the applicant, discussions with existing operators who provide coach services to the current facility at the Pool of London reveal that between 3 and 12 coaches are required to cater with a smaller cruise facility. However, it is identified that only 7 coach parking spaces will be provided on site, which seems insufficient.

96 Despite the additional information provided and the applicant's commitment to produce a coach management plan, to be secured via condition, TfL would still encourage further discussion with the Confederation of Passenger Transport (CPT) to better understand coach needs. This matter will however needs to be resolved in order to ensure that adequate facilities are proposed as well as how coach management on site can take place.

Taxis & Interchange

97 At the pre application stage TfL already requested that the developer should consider the demand for taxis and if necessary, provision of a formal taxi rank. TfL notes that all taxis coming to the site must be pre booked before a cruise ship docks at the terminal. As this is not a system that is adopted in any major transport hub in London, it suggests that this is arrangement with a private hire operator rather than taxi.

98 Taxi drivers are routinely aware of major events and knowledge of cruise ships would be widely available. Information could also be provided to the taxi radio circuits such as Computer Cab in order to alert drivers. In addition, the assessment states that the hotel will provide a high quality of accommodation for users of the cruise terminal. TfL therefore remains of the view that it is likely therefore to generate a high volume of taxi trips into and around London. Accordingly the provision of a carefully planned and located taxi rank to cater for cruise ship as well as hotel is still considered essential.

99 Despite the careful control and management referred to within the recent additional information provided, consideration of formal taxi ranking facilities, with adequate capacity, has been avoided. This is disappointing and therefore remains a serious outstanding concern, which will need to be urgently addressed, for TfL.

100 As already stated, it is considered likely that the development will generate additional demand for taxis at North Greenwich station. When taken with existing demand from trips to the O2 this could place severe pressure on the currently limited facility at this interchange. TfL would still encourage the developer to undertake further assessment of the impact on this facility, particularly in the event that the Thames Clipper arrangement is not materialised, and contribute to any infrastructure improvements that are necessary to mitigate such impacts. Given that embarking and disembarking is likely to operate during a 4-5 hours period, although likely time of the day and trip generation profile is still unknown, TfL would advise to look at time period which reflects peak demand during the O2 events on the evening. Further discussions would therefore be welcomed with regard to this matter.

River Services

101 As stated at the pre application stage, TfL welcomes the provision of a London River Services pier and increased river use. TfL understands that there are on-going discussions with Thames Clippers directly for chartered and scheduled services to serve turned-around and transit cruise passengers. It is expected that discussions about future services should continue.

102 Given that this could potentially reduce the number of "kiss & cruise" traffic for embarking and disembarking passengers and taxi trips for transit visitors, further consideration, including other marketing measures such as discounts or early check-in at Thames Clipper piers, should be considered for cruise ship passengers to promote its use.

103 In accordance with previous advice, TfL is generally supportive of the proposals as the principle of a cruise terminal at this location is considered to be consistent with London Plan policy 4C.7 '*Passenger and Tourism Uses on the Blue Ribbon Network*'. The delivery of the cruise terminal and the pier is therefore seen as key to the overall acceptability of the proposals. TfL however remains therefore firmly of the view that as the cruise terminal and pier are expected to be delivered with the first phase of the development, the local planning authority should impose a Grampian condition to that effect.

Servicing and Construction

104 In order to minimise vehicular traffic in the peak and to accord with London Plan policy 3C.25 '*freight strategy*' and draft revised London Plan policy 6.14 '*freight*', both a Construction Logistics Plan (CLP) and a Delivery and Service Plan (DSP) should be submitted. These plans should be secured by the borough through section 106 agreement and have been agreed by the applicant.

105 Given the site's location and use as a wharf, there is an excellent opportunity to maximise the use of river transport to deliver construction materials and to remove spoil from the site. These principles should be clearly set out in both the CLP and DSP. See also paragraph 56.

Travel planning

106 In order to manage travel demand and to accord with London Plan policy 3C.2 '*matching development to transport capacity*', and draft revised London Plan policy 6.3 '*Assessing Transport Capacity*' TfL welcomes the submission of a draft travel plan. Whilst this in generally line with TfL guidance however, it should include baseline data from the transport assessment

from which targets can be set. The travel plan has passed its ATTBuTE assessment and should be secured by the borough through section 106 agreement.

Summary

107 Before being able to fully support this application, TfL expects the issues raised above to be fully addressed.

Climate change

108 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions (Policy 4A.1). Chapter 5 of the draft replacement London Plan also requires developments to make the fullest contribution to minimising carbon dioxide emissions.

Energy efficiency standards

109 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include maximising the use of natural daylighting, energy efficient lighting, improved controls and variable speed drives.

110 The energy strategy confirms that the proposed development will achieve 2010 Building Regulations compliance through energy efficiency alone.

District heating

111 The applicant has investigated the possibility of connecting into an external district heating network. While no networks are available in the vicinity of the development at this time, the energy strategy commits to the provision of a heat exchanger allowing future connection to an external district heating network.

112 A site heat network fed from a single energy centre is proposed. An indicative drawing showing the proposed location of the energy centre has been provided. The applicant should provide the proposed floor area of the single energy centre and confirm that all dwellings and buildings use will be supplied by the site heat network.

Combined Heat and Power

113 A 405kW_e gas fired CHP unit will be installed once sufficient heat load has built up to allow efficient operation of the plant. Load profiles have been provided to support the sizing of the CHP and this is estimated to supply 60% of the total heat load. A reduction in CO₂ emissions of 41% is envisaged through this second part of the energy hierarchy.

114 A suitable trigger point for the installation of the CHP unit will need to be agreed and secured.

Cooling

115 Passive design features will be incorporated in the development to minimise the need for active cooling. Shading features and coated glazing will be used to avoid unwanted solar gain in summer. The hotel, communal areas, office and private spaces will have active cooling. Information on how the active cooling requirements will be met should be provided.

Renewable energy technologies

116 The energy strategy identifies the potential for 700sq.m of roof mounted photovoltaic panels. A reduction in CO₂ emissions of 4% is envisaged through this third element of the energy hierarchy.

117 The applicant should provide a roof drawing showing the areas that will accommodate PV panels, taking into account over shadowing and the use of roof space for other activities.

Summary

118 An estimate of the regulated carbon emissions of the development in tonnes of CO₂ per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account should be provided.

119 The applicant should provide an estimate of the overall carbon dioxide savings, expressed in tonnes of CO₂ per annum and percentages, relative to a 2010 Building Regulations compliant development.

Climate change adaptation

120 London Plan policy 4A.9 seeks to ensure future developments are able to adapt to climate change. The proposals include areas of green roof, the set back of flood defences, passive cooling features to avoid overheating and the diversion of rainwater away from the combined sewer. In addition they create new inter tidal habitat. Overall the development is acceptable in relation to London Plan climate change adaptation policies.

Local planning authority's position

121 As yet unknown.

Legal considerations

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

Financial considerations

123 There are no financial considerations at this stage.

Conclusion

124 Several London Plan policies are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Mix of uses:** the proposed mix of uses does not accord with London Plan policy but could be permitted if certain assessments and undertakings are provided because the development offer an almost unique opportunity to deliver an important strategic piece of infrastructure for London, namely the cruise liner terminal.
- **Strategic views:** the views assessment demonstrates compliance with London Plan policy 4B.18.
- **Urban design:** the standard of architectural quality is high and accords with London Plan policy 4B.1. However, the access to the site from Blackwall Lane remains challenging and there is an outstanding concern regarding the noise appraisal from the adjacent wharf.
- **Inclusive design:** The proposals have sought to address inclusive design, in the buildings and across the public realm which is challenging in part due to the need to design the development to accommodate flood defence levels. Whilst generally positive there are a number of points where clarification is required in order to confirm compliance with London Plan policies.
- **Blue ribbon network:** the development will increase use of the Blue Ribbon Network and will improve access to the riverside and inter tidal habitat and therefore complies with several policies in London Plan Chapter 4C. Access to the foreshore and use of the structures in the river is unclear at present.
- **Flood Risk** The flood risk assessment demonstrates general compliance with London Plan policy 4A.12 but more specific attention is needed on the residual risk.
- **Housing:** in the absence of an affordable housing offer or viability assessment, the application does not comply with London Plan policy 3A.10. Further information is required in order to ensure compliance with London Plan policy 3A.3 and the Housing Design Guide given the likely densities proposed.
- **Children's play space:** the proposals are welcomed as being in line with London Plan policy 3D.13.
- **Transport:** the transport aspects of the scheme do not currently comply with the full range of London Plan transport policies.
- **Climate change:** the energy strategy is generally acceptable however the overall carbon savings and location of rooftop PVs are required. The use of Green roofs, diversion of surface water to the Thames and setting back of flood defences are in line with policy.

125 On balance, the application does not comply with the London Plan.

126 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Mix of uses:** details should be submitted clarifying the impact of the scheme on the operation of the adjacent SIL and wharf and how more than 1 cruise vessel could be handled at the site. A planning condition should be applied to secure the delivery of the Cruise terminal prior to the other elements of the development.
- **Urban design:** further details should be submitted for the landscaping in relation to the main access route to Blackwall Lane. The noise assessment must consider the impact of an

operational freight wharf on Tunnel Glucose and the final design must ensure that the development will not be impacted by such noise.

- **Inclusive Design:** Further details of how disabled people access each of the buildings safely, including details of levels, gradients, widths and surface materials of the paths should be submitted, using larger scale plans to illustrate the various gradients on all the routes to and through the site. Consideration should be given to the provision of a 'dog spending area' in the public realm in the vicinity of the cruise liner terminal for use by passengers with guide dogs or assistance dogs disembarking from the cruise liners. Clarification is required on the Lifetime Homes Standards that have been used. It should be clear on the plans where the wheelchair accessible flats are located and how many there are - these should be distributed across tenure types and flat sizes to give disabled and older people similar choices to non disabled people and the design of the 4 bed wheelchair unit needs further consideration. The applicant should clarify the number of wheelchair accessible hotel bedrooms to be provided from the outset and should submit plans showing the layout of these rooms and of the rooms that will require adaptation to make them fully accessible in the future. Details of the number of suitably located and clearly designated Blue Badge parking bays for staff and visitors to the hotel, cruise terminal, residential accommodation and the other commercial uses should be provided.
- **Blue ribbon network:** access to the tidal foreshore and existing river jetties should be secured.
- **Flood Risk:** further information is required identifying how the buildings would cope in the event of a flood with particular respect to the lower ground and basement level parking and plant areas.
- **Housing:** the maximum reasonable amount of affordable housing should be provided taking account of other priorities in the opportunity area. Residential density should be specified based on net residential site area and should be related to the London Plan density matrix and detail how it complies with the Mayor's Housing Design Guide.
- **Children's play space:** child yield figures should be clarified based on the final unit mix.
- **Transport:** the issues raised in paragraphs 76 to 107 including car parking, coach and taxi space, cycle parking and the need for Construction Logistic Plan and Delivery and Service Plan for should be addressed prior to stage two.
- **Climate change:** an estimate of the overall carbon dioxide savings and location of the PVs, should be provided.

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