

planning report D&P/ 3262/01

One Woolwich, Connaught Estate

19 March 2014

in the Royal Borough of Greenwich

planning application no. 14/0086/O

Strategic planning application stage 1 referral

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

The proposal

Hybrid planning application for the redevelopment of the former Connaught Estate, comprising an outline application for up to 684 residential dwellings of which 332 are subject to detailed application (Phase 1), with associated access, parking and private and public open spaces.

The applicant

The applicant is **Lovell Partnerships Limited** and the architect is **PTEa**.

Strategic issues

The principle of the regeneration of the Connaught Estate is fully supported as part of the 'One Woolwich' regeneration programme. The **net loss of affordable housing** is acceptable given the objective of creating **mixed and balanced communities** in an area of concentrated deprivation and provisions in the development agreement to potentially increase the level of affordable housing. The overage agreement should also be secured as part of the legal agreement.

The proposal represents **high quality urban design** which meets and exceeds the Mayor's space standards and delivers excellent amenity space. Further information is required in relation to **children's playspace**.

Further information is required on the **energy strategy** and **transport matters**.

Recommendation

That Greenwich Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan; but that the possible remedies set out in paragraph 69 of this report could address these deficiencies.

Context

1 On 7 February 2014 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 20 March 2014 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, 1C and 3A of the Schedule to the Order 2008:

- Category 1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.
- Category 1C: Development which comprises or includes the erection of a building of one or more of the following descriptions— (c) the building is more than 30 metres high and is outside the City of London.
- Category 3A (1): Development which is likely to— (a) result in the loss of more than 200 houses, flats, or houses and flats (irrespective of whether the development would entail also the provision of new houses or flats).

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

Site description

4 The proposed development site is the Connaught estate, which formerly comprised the residential quarters associated with the Royal Artillery Barracks. The site is approximately 3.1ha in area and the current Estate, constructed in the 1970s, comprises a total of 338 dwellings, of which 303 (92%) are available for affordable rent and 27 (8%) leasehold. The residential accommodation is provided in a series of high-rise east-west blocks linked by a series of lower rise north-south blocks (8 blocks in total) and comprises the following unit mix: 108 x 1-bedroom (33%), 83 x 2-bedroom (25%), 131 x 3-bedroom units (40%) and 8 x 4-bedroom units (2%). There are a total of 308 car parking spaces available across the site, including the provision of undercroft parking.

5 The site is 3.1 hectares and located approximately 500 metres to the south of Woolwich town centre and approximately 300 metres to the east of the Royal Artillery Barracks. The site is bound by Woolwich New Road to the west, Brookhill Road to the east, and Sandy Hill Road to the north. To the south, the site is bound by residential use and a small area of woodland and open space. There is change in level of about 6 metres from the north to the south of the site and cut into the topography at the most southern point is a retaining wall, which extends along the rear of the site and extends to enclose the site frontage along Woolwich New Road. This wall is listed.

6 The area surrounding the site is predominantly residential in use. To the north of the site is the Woolwich Central Baptist Church and car park, and more recent residential development in blocks of up to 10 storeys in height. Beyond this is the Love Lane redevelopment site (bound by Grand Depot Road, Woolwich New Road, Love Lane and Wellington Street) known as 'Woolwich Central' – the site will replace former civic and public buildings with a new Tesco superstore, town centre car park and 1,000 dwellings as part of the ongoing regeneration of Woolwich town centre.

7 There are a number of public transport connections within close proximity of the site, providing direct connections to central London and the surrounding area. The site is located on an existing bus route which runs along Woolwich New Road/Grand Depot Road. Woolwich Arsenal station (which is on the DLR route) is located 400 metres away in Woolwich town centre and provides direct links to Stratford International and London City Airport, as well as London Charing Cross and London Cannon Street stations. Woolwich Dockyard Station is located 1 kilometre away to the north-west on Belson Road, and provides direct links to London Cannon Street and Dartford. A new Crossrail station will open in Woolwich in 2018.

The closest section of the Transport for London Road Network (TLRN) is the A205 (South Circular) 200 metres from the site, whilst the Strategic Road Network (SRN), the A206 (Woolwich Road) is approximately 1 kilometre distant. This estate has an excellent public transport accessibility level (PTAL) of 6a due to its proximity to Woolwich Arsenal National Rail and DLR Station and four local bus services.

Details of the proposal

8 In 2010, the Greenwich Council carried out an in-depth review of the condition of council homes in Woolwich, and in consultation with residents, agreed that the three Woolwich Estates (Connaught, Morris Walk, and Maryon Road) should be comprehensively redeveloped. Following a competitive bid process, Lovell, with Asra and Morgan Sindall, were appointed as development partners in 2012. In total the One Woolwich Project comprises the demolition of 1064 homes (961 tenanted and 103 leasehold interests) and the development of approximately 1,600 new homes (525 affordable homes and 975 for sale). The redevelopment is a key part of the overall regeneration of Woolwich and will take approximately 12 years to deliver.

9 The current proposals for the redevelopment of the Connaught estate form part of the Greenwich Council's overall regeneration vision for Woolwich, which includes significant new housing development (including improvements to the existing affordable housing stock), transport improvements, new retail outlets, and improvements to the public realm.

10 A hybrid application has been submitted for the Connaught Estate. The detailed application forms the proposal for Phase 1 and comprises the erection of 332 units residential dwellings with associated access, parking and private and public open spaces. The outline application forms the proposal for Phase 2 and Phase 3 and comprises the erection of up to 352 residential dwellings with associated access, parking and private and public open spaces.

11 Phasing plans have been submitted with the application to identify the relevant phases of development. In order to guide the future reserved matters applications (for Phases 2 and 3) a set of parameter plans have been produced and form part of the application as follows:

- Phasing
- Zone of deviation
- Building heights
- Access and circulation
- Amount of open space, play space and private and shared amenity space
- Tenure

12 The parameter plans establish a number of limits which any reserved matters application would need to comply with and are read alongside the design code which seeks to secure the quality of future phases of development. Referable outline planning applications for the redevelopment of Maryon Grove and Road Estate and Morris Walk North and South Estates have

also been submitted to the Mayor (D&P3262a and D&P3262b&c), and are dealt with separately on this agenda.

Case history

13 A pre-application meeting to discuss the wider 'One Woolwich' proposals was held on the 31 October 2013 and it was noted that "GLA officers welcome the opportunity to engage with the applicant, and the Council, at an early stage in the development process, and strongly support the comprehensive approach taken in bringing forward the three sites together as one redevelopment proposal. Further discussions are required regarding justification of loss of affordable housing, design, inclusive design, climate change, energy and transport". Further pre-application meetings were subsequently held to discuss matters relating to energy and design.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; Housing Strategy; draft Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG*
- Affordable housing *London Plan; Housing SPG; draft Housing Strategy; draft Housing Strategy*
- Urban design *London Plan*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Transport Functions SPG*
- Parking *London Plan; the Mayor's Transport Strategy*

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 2006 Greenwich Unitary Development Plan (saved policies) and the Royal Borough of Greenwich Core Strategy with Development Management Policies (Submission Version with Modifications) and the 2011 London Plan (with 2013 Alterations).

16 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The draft Further Alterations to the London Plan (January 2014).

Principle of development

Estate regeneration

17 The site is located within Woolwich Town centre, which is identified in the London Plan as an Opportunity Area and on London Plan Map 2.5 as falling within an area for regeneration. Greenwich Council has also identified that the regeneration of the Woolwich estates is a key priority to deliver improved housing and environments for residents. As such, the proposed

regeneration of the Connaught Estate as part of the wider 'One Woolwich' regeneration programme is supported.

18 Policy 2.13 of the London Plan is specifically concerned with areas identified for regeneration and notes that the loss of housing in such areas should be resisted unless it is replaced by better quality accommodation of at least equivalent floorspace. This is echoed in Policy 3.14 which aims for replacement housing, market and affordable, to be equal to or higher density than the existing and at least equivalent floorspace. At present the estate is dominated by social rented accommodation with 303 of 330 residential units on site for social rent and 27 units (8%) held by leaseholders. Aside from the mono-tenure of the current estate, the existing buildings are of poor quality with a design and layout that creates a sense of exclusion from the wider area. As such the regeneration of the estate itself is supported as part of the wider regeneration objectives for Woolwich town centre.

19 The proposals seek to demolish the existing buildings and replace them with 679 new residential units as a mix of affordable rent, intermediate and private sale. This will provide a more varied range of tenures as well as an increase in the quantum of units, the area of residential floorspace and the number of habitable rooms but with a proposed level of affordable housing of 35%. This represents a loss of affordable housing on the site (and across the three sites). This is not in line with strategic planning policy and further explanation is set out below.

Housing

Affordable housing

20 At present there are 303 affordable units on site, which are provided as social rent. The proposals will provide 241 affordable units (35%), as a split of 169 rent and 72 intermediate, which represents a net loss in the quantum of affordable units of 62 units (and a net loss of 134 social rented units). This is contrary to London Plan policy 3.14 which sets out that any *“loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace”*. Paragraph 3.82 establishes that estate renewal should take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area (see Policy 3.19), and the amount of affordable housing intended to be provided elsewhere in the borough. It also notes that where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floor space of affordable housing.

21 The proposals will result in the following changes to affordable unit numbers, floorspace and habitable rooms:

Affordable	Existing	Proposed	
Unit numbers	303	241	-62
Hab rooms	951	705	-246
Floorspace (sq.m.)	22,723	16,390	-6,333

Intermediate	Existing	Proposed	
Unit numbers	0	72	+72
Hab rooms	0	230	+230
Floorspace (sq.m.)	0	5,075	+5,075

Private	Existing	Proposed	
Unit numbers	27	438	+411
Hab rooms	78	1,232	+1,154
Floorspace (sq.m.)	1920	30,430	+28,510

22 To counter the significant reduction in affordable units, floorspace and habitable rooms, the proposal does introduce intermediate rented accommodation into the unit mix. It is proposed to provide the rented units as affordable rent. Of the 241 affordable units, 71% are to be provided as affordable rent with 29% intermediate in line with Greenwich Council policy. The introduction of 72 intermediate and 438 private units will be used to cross-subsidise the development, and widen the housing choice in the Woolwich area. This represents a net loss of social rented and affordable housing and Greenwich Council has set out the following arguments to justify this loss on the Connaught Estate and across the 'One Woolwich' sites as a whole:

- There will be a net increase of 489 housing units in total across the three 'One Woolwich' sites.
- The Council has committed that there will be no overall loss of affordable homes within the borough or Woolwich area.
- The three estates are located within Woolwich Common and Woolwich Riverside wards which are characterised by high concentrations of social rented accommodation and levels of deprivation compared with Royal Greenwich and London as a whole as such they require the introduction of more varied tenure.
- The Greenwich Council is anticipating that of the total 17,000 new homes to be provided over the plan period, some 6,000 will be affordable (35%) to counteract the loss of affordable housing through the 'One Woolwich' scheme. In addition, there are further strategic sites which will come forward (e.g. Charlton Riverside) with the potential to deliver up to 5,000 new homes.
- The development agreement between Lovell and Greenwich Council does allow for up to 50% of homes on individual sites to be affordable subject to viability and the wider regeneration of the area and this may occur through either the allocation of GLA housing grant (secured through the agreement) or through capital receipts from land values (secured through the overage agreement).

23 These issues are further explored below.

Mixed and balanced communities

24 Detailed information has been submitted by Greenwich Council to support the concentrations of social rented housing and deprivation in the Woolwich area. The census 2011 data submitted demonstrates that within the Woolwich Common and Woolwich Riverside wards, over 50% of homes are affordable (rent and shared ownership), compared with 35% within Greenwich and 25% within London. Similarly, proportionate to the population that claim benefit the level is 25% within the two wards, compared with less than 20% in the borough and 15% within London. Taking this information into account, the objective of creating a more mixed housing tenure for the Connaught estate is acceptable in this particular instance in line with the objectives of London Plan Policies 3.8 and 3.9 to create mixed and balanced communities. However, the extent of the loss of affordable housing on the Connaught Estate to create this objective in this instance would not normally be acceptable and requires further exploration.

Increasing housing output

25 It should be noted that the private market units will constitute 65% of the total number of units across all three sites and a similar proportion on the Connaught Estate itself. Royal Greenwich notes that this loss of affordable housing is tempered by its substantial affordable housing pipeline, supported by the Greenwich Council's Core Strategy Submission Version (September 2013) which highlights a commitment to deliver 29,078 homes and in paragraph 3.1.2 a further commitment is set out to make a contribution to the London-wide target of at least 13,200 more affordable homes over the plan period.

26 The Mayor's Housing SPG, is clear that the objective of no net loss of affordable housing should generally be achieved without taking into account areas outside the estate boundary and that development at significantly increased density may be necessary to generate sufficient value to support replacement of affordable housing provision or to achieve a mixed and balanced community.

27 In this instance, development at significantly increased densities has not resulted in a replacement level of affordable housing and has in fact resulted in a net loss of affordable housing of 62 units (and 134 social rented units) on the Connaught Estate. It is accepted that a further increase in density would not be appropriate given the context of the site. Given this net loss of affordable housing on the Connaught estate and across the 'One Woolwich' programme where there is a 44% reduction in affordable housing overall, detailed viability work has been undertaken to demonstrate that it is not feasible at this stage for any additional affordable accommodation to be provided in relation to the uplift of private sale accommodation, in accordance with London Plan Policy 3.12.

28 This viability work has been undertaken as part of a financial model which forms part of the development agreement with the development partner Lovells. This model shows the calculation and payment schedule of any receipt to the local authority and has been independently audited on behalf of Greenwich Council by PWC. The results of this audit have been shared with GLA officers and assessed as acceptable. It has been agreed that after each of the 7 phases of development a revised viability position will be established to take into account potential land receipts and increased sales values, expected as a result of the investment in Woolwich and the proposed Crossrail station opening in 2018. This has been secured through an overage agreement, the details of which have been shared with GLA officers.

29 Should values increase, provision has been made within the development agreement for up to 50% of homes on individual sites to be affordable and Greenwich Council can directly

purchase properties within the scheme or use grant to act as a registered provider or directly fund the Council's own newbuild programme if necessary.

30 As such, although the proposals will result in a net loss of affordable housing, the objective of creating mixed and balanced communities in principle is supported in line with policy 3.9 of the London Plan. Greenwich Council has confirmed its commitment to ensuring that no net loss of affordable housing occurs within Woolwich and the borough over the plan period and has demonstrated a deliverable housing pipeline in excess of 29,000 units. In addition, provisions have been put in place through the development agreement to ensure that viability is reassessed to allow an increase in affordable housing should sales values increase or the proposal be awarded grant. As such, there are specific circumstances relating to these individual sites to increase the affordable housing offer in line with the provisions set out in London Plan policy 3.12. These provisions should though be carried through into the section 106 agreement for robustness and clarity.

31 Although it is proposed that an indication of drawdown against deliverables set out in the Overarching Statement will be submitted at each reserved matters stage, further information should also be supplied from Greenwich Council on the mechanisms to be employed to ensure that the supply and demand of affordable housing is effective over the life of the 'One Woolwich' project. Should this information be provided and the mechanisms noted above secured in the legal agreement, on balance, the loss of affordable housing on the Connaught estate is accepted.

Housing mix

32 Phase 1 is a detailed application and proposes 332 units with the following mix: 1 Bedroom x 121 units, 2 Bedroom x 178 units, 3 Bedroom x 26 units and 4 Bedroom house x 7 units. In this first phase, a total of 133 units are proposed to be provided as affordable with an aggregate total of 35% of all dwellings provided across the scheme as affordable housing. Phases 2 and 3 have been submitted in outline and as such the precise mix of units will be determined at the reserved matters stage.

33 This mix has been developed in line with local requirements and has been agreed by Greenwich Council, it is noted that there is a reduction in the numbers of family housing compared with the existing estate. However, given the town centre location, the concentration of family housing is more appropriate in Morris South and Maryon Grove estates to ensure that across the proposals as a whole the provision of family homes will meet the local policy target.

Information on the proposed target rents and the mechanisms to ensure long-term affordability of the proposals have been provided. The affordable rent units proposed are to be charged having regard to the caps set by the Local Authority. The intermediate properties are to be provided as shared ownership and will accord with the affordability levels of the London Plan Annual Monitoring Report 9 (2011-12) which requires one and two bedroom homes to be affordable to those with annual incomes up to £66,000, with family homes (three or more bedrooms) affordable to those with incomes up to £80,000 per annum (AMR para 3.28).

34 The applicant should confirm that these provisions will also be secured as part of the legal agreement along with provisions to ensure that tenants are able to return to the redeveloped estates if desired.

Density

35 The site occupies an area of 3.1 hectares and is located in an area with the highest public transport accessibility level of six. London Plan Table 3.2 advises that a density of between 600

and 1100 habitable rooms per hectare would be appropriate in an area with an urban character such as this. The scheme has a proposed density of 627 habitable rooms per hectare for the first phase which comfortably falls within the suggested density range for units. Given the high quality design of the proposal and provisions secured within the design code, this is acceptable.

Amenity

36 In the development of the proposals for the site London Plan Policy 3.5 and the Mayor's Housing SPG have been taken in to consideration. At present, none of the existing units benefit from private external amenity space and the immediate surroundings at ground floor level do not encourage its use for amenity purposes. The proposals provide for all units in Phase one to benefit from private external amenity space in line with the minimum standards set out in the Mayor's SPG. All units in phases two and three will equally meet the minimum internal and external space standards of London Plan Table 3.3 and the number of single aspect units has been kept to a minimum.

37 The applicant has noted that some 405 square meters of playspace for children aged 5 years will be provided within the proposed linear park. Further information should be provided to estimate the anticipated child occupancy of the development and ensure that this level of provision is adequate to ensure full compliance with London Plan policy 3.6.

Urban design

38 The proposed scheme is well designed, creating a legible and permeable environment which provides good quality housing and enhances the connection of the site into the surrounding areas of public realm.

39 The overall approach of locating linear blocks enclosing public streets and spaces is strongly supported, ensuring most of the public realm is well defined and flanked by good quality frontage. The proposed creation of Cambridge Avenue, Waterman Terrace and Walpole Lane within the site will ensure good connections with the surrounding area and permeability for pedestrian movements from the east towards the town centre.

40 The creation of new frontages along Brookhill Road and Woolwich New Road will clearly define the new development and enhance the external streetscape with good levels of activity and overlooking ensuring these streets feel safe and will be well used, which is welcomed, and is strongly supported. This approach is also consistent to the internal street layouts and street frontages.

41 The residential quality of the scheme is very high, with a generous distribution of front entrances at ground floor level. All cores are accessed directly from the public realm, further adding to this whilst providing clear and legible entrances to the apartments. The use of stacked ground floor and duplex/triplex typologies ensures that the scheme provides a very high proportion of dual aspect units, which is also strongly supported. The internal layouts are generous.

42 The proposal includes buildings of up to nine-storeys in height in Blocks A11 and D13, the gateway to the site. This height is in keeping with buildings in the surrounding area, the design of the scheme as a whole is of a high quality with good provision of amenity space in the proposed linear park, and its height does not therefore create any particular concern.

43 Overall the applicant is to be commended on the high quality of design proposed for the first phase of the Connaught Estate. The design code will be secured as part of the section 106 agreement to ensure that phases two and three also deliver a high level of design quality.

Inclusive design

44 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will be required to meet Lifetime Homes standards, and 10% will be capable of easy adaptation for wheelchair users. Compliance with these standards has been demonstrated on plan, using a sample of flat layouts, as part of the design and access statement.

45 The applicant has committed to work with Royal Greenwich to ensure that the mix of wheelchair accessible units proposed meets locally identified need and that the future marketing of the private wheelchair accessible homes should ensure that prospective purchasers are aware of the accessibility and adaptability of these units through specific marketing to the disability community and to older people's organisations.

46 In accordance with London Policy 7.2, the applicant has demonstrated that routes through the development are fully accessible and that access to and from public transport facilities to proposed entrance points are legible and clearly identifiable. Adequate provision of blue badge parking bays has been made, in line with London Plan Policy 6.13, and Table 6.2 and this will be secured through the overall parking management strategy, which is welcome.

47 Issues relating to inclusive design have been satisfactorily addressed in line with strategic policy but it is recommended that conditions are applied to ensure an access consultant is employed to address access issues at the reserved matters stages.

Climate change

Energy efficiency standards

48 A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting, mechanical ventilation with heat recovery in the flats and attention to detail to reduce thermal bridging. The demand for cooling will be minimised through solar control glazing, low energy lighting and mechanical ventilation.

49 The development is estimated to achieve a reduction of 31 tonnes per annum (4%) in regulated Carbon dioxide emissions compared to a 2010 Building Regulations compliant development. DER and TER sheets for sample dwellings including efficiency measures alone should be provided to support the savings claimed.

District heating

50 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development however the site is approximately 500 metres to the south of the Woolwich Arsenal district heating opportunity area. The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

51 The applicant is proposing to install a site heat network connecting all apartment blocks. The houses will not be connected to the network due to their lower heat density. A drawing showing the route of the heat network linking all apartment blocks on the site has been provided.

52 The site heat network will be supplied from a single energy centre located on the ground floor of block C3. Further information on the floor area of the energy centre should be provided.

Combined Heat and Power

53 The applicant is proposing to install a 300 kW gas fired combined heat and power (CHP) unit as the lead heat source for the site heat network. The applicant should clarify whether the installed capacity quoted is the electrical rating or the thermal rating.

54 Further information, including monthly load profiles, should be provided to explain the sizing of the CHP system and the savings claimed. The CHP should be sized to provide the domestic hot water load, as well as a proportion of the space heating in order to optimise its use before considering renewables (in line with the energy hierarchy). Further information (including a specifications sheet) should also be provided on the CHP engine proposed to support the plant efficiencies claimed.

55 A reduction in regulated carbon dioxide emissions of 252 tonnes per annum (32%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

56 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install enough solar photovoltaic (PV) to meet the 40% target. This has been estimated to be 1,061sq.m of PV panels. A layout showing the proposed location of the panels should be provided. A reduction in regulated carbon dioxide emissions of 46 tonnes per annum (9%) will be achieved through this third element of the energy hierarchy.

Summary

57 Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the carbon dioxide emission reductions at each stage of the energy hierarchy. A reduction of 329 tonnes of carbon dioxide per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 41%. The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan however the comments above should be addressed before the carbon savings and compliance with London Plan energy policy can be verified.

58 Chapter Five of the London Plan sets out the Mayor's requirements regarding both climate change adaptation and mitigation, and the applicant has demonstrated how the proposal will meet these essential and preferred standards as set out in the Mayor's Sustainable Design and Construction SPG.

Transport

Trip Generation

59 Transport for London (TfL) agrees that trips generated by the One Woolwich developments collectively and individually will not have an adverse impact on the local highway or public transport networks.

Walking and Cycling

60 Resident and visitor cycle parking proposed for each site satisfies London Plan standards. The estates are generally well served by walking and cycling routes. However, it is understood that the Council has identified a number of local cycling improvements which would benefit the new residents. Accordingly TfL would support RBC securing an appropriate section 106 contribution from the developer towards their delivery, in accord with London Plan Policy 6.9 Cycling.

Car Parking

Disabled car parking and Electric Vehicle Charging Points (EVCPs) provision included in all four schemes accords with London Plan policy. TfL supports the proposal for a parking management company to allocate and manage parking. This arrangement should be secured via the section 106 agreement, as should the ineligibility of residents for permits to park in local controlled parking zones. 0.5 parking spaces per dwelling are proposed. Whilst this is below the London Plan maximum standard, given the site's proximity to the town centre and excellent public transport links a reduction in parking should be considered, together with encouraging the use of more sustainable modes of travel. Alternatively the proposed ratio should be justified.

Travel Plan

61 A Residential Travel Plan for the site has been prepared. This plan should be secured through the section 106 agreement. It should promote public transport, walking and cycling and the local car club (via parking and free initial membership for residents). These measures would support a reduction in car parking numbers and satisfy London Plan Policy 6.13.

Construction

62 In accord with London Plan policy and especially given the complexities of developing close to existing and new residents, a Construction Logistics Plan (CLP) should be secured via planning condition. The proposed delivery and servicing arrangements for each site are acceptable.

CIL

63 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) which formally came into effect on 1st April 2012. The rate for Greenwich is £35 per square metre and the required CIL contribution should be confirmed by the applicant and council once the components of the development have been finalised.

64 In summary, car parking provision should be reduced or further justification given for the proposed ratios; possible contributions towards improving local cycling routes are sought and a CLP and Travel Plan for each site should be secured.

Local planning authority's position

65 Greenwich Council is assessing the application alongside the outline applications for the Morris Walk and Maryon Grove and Road estates. It supports the principle of the regeneration of Woolwich through the 'One Woolwich' project.

Legal considerations

66 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

67 There are no financial considerations at this stage.

Conclusion

68 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Affordable housing:** The net loss of affordable housing is, on balance, acceptable given the intention to create mixed and balanced communities. The confirmed affordable housing pipeline for the Woolwich area and the provisions to increase the level of affordable housing through the overage agreement constitute site specific circumstances in line with London Plan 3.12. These provisions to review the scheme through the overage agreement and maintain affordability will need to be secured through the legal agreement and further information is requested on the mechanisms for monitoring supply and demand of affordable housing units over the 'One Woolwich' programme.
- **Children's playspace:** The child occupancy should be estimated and further information is required in line with London Plan 3.6.
- **Climate change:** The general approach is supported, although further information is required on the use of CHP and the PV cells.
- **Transport:** further information on car parking and possible contributions are required along with a CLP and a travel plan.

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