

FAO : Samantha Moreira. Royal Borough of Greenwich

**15/0716/F - Land at Greenwich Peninsula, to the South of the O2, SE10** – Outline planning permission for the demolition of buildings and mixed use redevelopment including up to 12,678 residential dwellings and 220 serviced apartments, retail, restaurant, business uses, hotel, primary school, health care facilities, visitor attraction and film & media studios, residential and non-residential car parking and up to 2000 AEG parking spaces together with proposals to revise part of the site of the 2004 approved Greenwich Peninsula Masterplan proposed planning application reference.

The East Greenwich Residents Association objects to the above application. Our general concern is the scale of the application and the degree of change relative to the approved 2004 master plan; principally a 50% increase in residential units and significant increase in housing density - the height of buildings we believe to be overly aggressive.

We also believe that there has been an inadequate period of consultation and that the consultation has lacked detail. We would expect such a significant change to the masterplan to undergo a more rigorous and transparent process. The impact of visual massing, building density, occupation density and the resulting increase in traffic flow in and around Greenwich should have been publicly debated with a much broader group of stakeholders and been independently assessed and reviewed to ensure compliance with the council's 2014 own core strategy.

Specifically, EGRA objects to the submission on the following grounds:

**Residential unit uplift** – The new proposal seeks to increase the residential unit capacity by over 50% from 10,010 units (2004 approval) to 15,720 units. This uplift in residential density is achieved by proposing a large number of tower blocks. These high rise developments, in some cases rising in excess of 40 storeys, are a significant revision to the 10-15 storey blocks consented to in the original plan. Aside from the considerable impact on housing density and population density in East Greenwich and its attendant issues on transport infrastructure, such massing will have a considerable visual impact on Greenwich skyline and will be considerable pressure to bear on the local, mainly residential community.

We would also ask that the council investigate further the assertion that the Greenwich Peninsula can support delivery of 13.5k homes as we believe that that statement relates to an area defined in the London Plan which exceeds the boundary of this application.

**Housing Density** – The resultant increase in housing density appears to be in breach of the London Plan. Elements of the scheme are at a density in excess of 430 units per hectare vs a recommended density of 405 units per hectare.

**Affordable Housing** – We are concerned that there appears to be no commitment from the developers on the exact percentage of affordable homes. We are pleased to note that the level of affordable housing in the completed and approved areas of the peninsula comply with the stated aims of the Councils core strategy (in excess of 35%). We do note however, in recent applications for development in the borough, these standards have been allowed to slip and therefore see the potential for similar shortfalls here given the lack of guarantees provided by the developer.

**Sustainable Development** - On a more general level, we would ask the council to investigate the extent to which family housing and the commercial footprint have been adequately provided for in this development. We note that a figure of 20% has been provisioned for the former and there is very little detail on the latter. The extent to which Greenwich appears to be rapidly becoming a dormitory town of luxury high rise accommodation with little social cohesion is a genuine concern of the residents of East Greenwich.

**Transport** – We note the developer traffic modelling suggest an increase in traffic flow of between 5 and 9%. We do have general concerns that there is a looming transport crisis for the borough and there seems to be little coordinated thinking with regard to traffic planning. The Silvertown Tunnel, The Cruise Terminal and IKEA to name but three, are all major projects that should be considered together when assessing overall permissions related to traffic impact. The further development of the wharves along the riverside in East Greenwich is of further concern, the potential impact of which seems to have been ignored.

**Open Spaces** - Although we note an increase in size of the central park, the increase in population density far exceeds the uplift in open space provision. We also question the overall impact of this density and the nature of high rise housing on the overall quality of the environment for those who will live, play and work on the peninsula.

### **In conclusion:**

The East Greenwich Residents Association objects to the above application.

Given the scale and scope of this development and the likely impact on both the environment and the community as a whole, we feel strongly that the consultation was perfunctory and opaque. The heights and densities of the proposed residential blocks are excessive and do not comply with recommendations set out in the London Plan.

We have major concerns that the developer's commitment to affordable and family housing are weak and fall short of the council's core strategy. We believe that the assertions relating to traffic modelling are not credible and, at a minimum, the council should see this proposal within the context of the other major developments in the area that are impacting traffic flow.

We also believe that given the uplift in housing density, the commensurate increase in open space is inadequate.

Sincerely

Daniel Hayes

Vice Chair

Charlotte Baker

Secretary

EGRA ( East Greenwich Residents Association)