

Planning Board	Agenda Item: 6
7 September 2021	Reference No: 21/0510/F

Applicant: Greenwich Builds
Agent: Pellings

Site Address: Former Plumstead Leisure Centre, Speranza Street, Plumstead, London. SE18 1NX	Ward: Plumstead Application Type: Full Planning Permission
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I.1 Recommendation

I.1 Planning Board are requested to grant full planning permission for;
The Demolition of existing buildings and construction of a residential development (Use Class C3) with associated playspace, landscaping, car parking, waste and cycle store.

I.2 Subject to:

- (i) The prior completion of a Directors' Agreement containing the planning obligations as summarised in the heads of terms as set out in this report (Section 22, any addendums, and the minutes of this Planning Board meeting.
- (ii) The conditions (Appendix 2) to be detailed in the notice of determination.
- (iii) To authorise the Assistant Director (Planning & Building Control) to:
 - 1. make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2), its addendums and the minutes of this Planning Board meeting, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice;
 - 2. finalise the detailed terms of the Directors' Agreement, as set out in this report (Section 22), as set out in this report, its addendums and the minutes of this Planning Board meeting; and
 - 3. consider, in the event that the Directors' Agreement is not completed within three (3) months of the date of the Planning Board resolution, whether consent should be refused on the grounds that the agreement has not been completed within the appropriate timescale,

and that the proposals are unacceptable in the absence of the recommended planning obligations; and if the Assistant Director (Planning & Building Control) considers it appropriate, to determine the application with reasons for refusal which would which would including the following:

- In the absence of an agreement to secure financial and non-financial contributions for Transport the development is contrary to policies T2 and T5 of the London Plan (2021), IM4 and IM(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014) and the Planning obligations (s106) Guidance SPD (adopted July 2015).

2.1 Summary

2.1 Detailed below is a summary of the application:

The Site	
Site Area (ha)	0.31 ha
Heritage Assets	None
Tree Preservation Order	No
Flood Risk Zone	Zone 1
Controlled Parking Zone	No
PTAL Zone	3

Proposed Building – Block A	
Building height (metres)	8.7m- 9.3m
No. of storeys	2- 3

Housing		
Units proposed	17	
Unit Mix	1b/2p (2)	2
	2b/4p (10)	8 2 (W/A)
	4b/7p (5)	5
Affordable Housing/ Tenure Split	London Affordable Rent (LAR)	100%

Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes
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Transportation		
Car Parking	No. existing car parking spaces	0
	No. proposed Car Parking Spaces (14)	12 2 blue badges, for the Wheelchair housing
Cycle Parking	No. Proposed Cycle Parking	35
	Complies with policy	Yes

Sustainability / Energy	
Reduction in CO2 Emissions over the Building Regulations Part L 2013 Target Emission Rate	95%

Public Consultation	
Number in Support	0
Number of objections	2
Main issues raised (Addressed in section 6 of the report)	<ul style="list-style-type: none"> • Impact on privacy • Development is intrusive • Impact on quality of life • Amount of homes is too high and impact on parking • Not all people are online

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

2.3 The application is considered acceptable and is recommended for approval as set out in section 1 of this report.

3.0 Relevant Planning History

Plumstead Library, 232 Plumstead High Street, Plumstead, London, SE18 1JL

- 3.1 17/2879/F- Works to existing Grade II listed Plumstead Library to facilitate increased floor space for additional library and community services (Class A3/B1/D1/D2 uses). Works include demolition of existing building to the rear; and construction of a 2-storey extension for new library spaces, sports hall, amenities and gym; refurbishment works to the listed library building, and public realm improvement works including improved access, cycle parking, and new on-street parking space. **Approved 15/12/2017.**
- 3.2 17/2903/L- Internal refurbishment of existing library building; demolition of existing extension to the rear; and redevelopment of part of the site comprising a 2-storey rear extension to facilitate the provision of additional floorspace (Class A3/B1/D1/D2 uses), public realm improvement works, cycle parking, and refuse/recycling facilities. Provision of one on-street parking space. **Approved 11/01/2018.**
- 3.3 18/2085/NM- An application submitted under Section 96a of the Town & Country Planning Act 1990 for a non-material amendment in connection with the planning permission 17/2879/F, dated 15/12/2017 for the works to existing Grade II listed Plumstead Library to facilitate increased floor space for additional library and community services (Class A3/B1/D1/D2 uses). Works include demolition of existing building to the rear; and construction of a 2-storey extension for new library spaces, sports hall, amenities and gym; refurbishment works to the listed library building, and public realm improvement works including improved access, cycle parking, and new on-street parking space to allow: - Amend wording of Condition 4- Secured by Design to Prior to the occupation of the development hereby permitted. - Amend wording of Condition 9- Air Quality Measures to Prior to the installation of any fixed plant, mechanical ventilation systems, filtration systems or equipment necessary for the development hereby approved - Amend wording of Condition 11- Noise from fixed plant and equipment to Prior to the installation of any fixed plant or equipment necessary for the - Amend wording of Condition 14 ? On-site renewable energy technologies to prior to the construction of above ground works for the development hereby approved. - Amend wording of Condition 16 ? BREEAM to No construction of above ground works for the development hereby approved | PLUMSTEAD LIBRARY, 232 PLUMSTEAD HIGH STREET, PLUMSTEAD, LONDON, SE18 1JL. **Approved 01/04/2019.**

- 3.4 18/2793/MA- An application submitted under Section 73 of the Town & Country Planning Act 1990 for a minor material amendment in connection with the planning permission 17/2879/F, dated 15/12/2017 for the [Works to existing Grade II listed Plumstead Library to facilitate increased floor space for additional library and community services (Class A3/B1/D1/D2 uses). Works include demolition of existing building to the rear; and construction of a 2-storey extension for new library spaces, sports hall, amenities and gym; refurbishment works to the listed library building, and public realm improvement works including improved access, cycle parking, and new on-street parking space.] to allow: Variation of condition 2 (Materials) from 6mm mortar joints & NF (240 x 115 x 71mm) to 10mm mortar joints & UK sized bricks (215 x 102.5 x 65mm). The enlargement of badminton court, Removal of sawtooth patterned brick work, Additional roof access, change to roofing material to new build extension, Addition of acoustic partition, Relocation of rainwater attenuation tank, Updated changing room layout Updates to Skylight/ columns & triplets. | PLUMSTEAD LIBRARY, 232 PLUMSTEAD HIGH STREET, PLUMSTEAD, LONDON, SE18 1JL. **Approved 02/12/2019.**

4.0 Site Description

- 4.1 The 0.31 hectare site is located to the south of Plumstead High Street at the end of Quilter Street. It is bound by rear gardens of primarily 2-storey Victorian terraced houses on Speranza Street to the north and west, Saunders Road to the south and Rippolson Road to the east. The site is characterised by warehouse buildings in an industrial aesthetic of fletton bricks with saw-tooth roof profiles and some single storey infills.
- 4.2 There is an electricity substation in the north-west corner facing Speranza Street and within the envelope of an existing building. The site sits behind the recently-built Plumstead Centre, an extension to the original Grade II listed Plumstead Library building which faces the High Street with its flank along Quilter Street.
- 4.3 The warehouses were originally built in 1973 and refurbished in 2007. The site has been vacant since 2017 following the development of the Plumstead Centre which houses both a library and a leisure centre, which is to the north of the application site. The site is not publicly accessible.

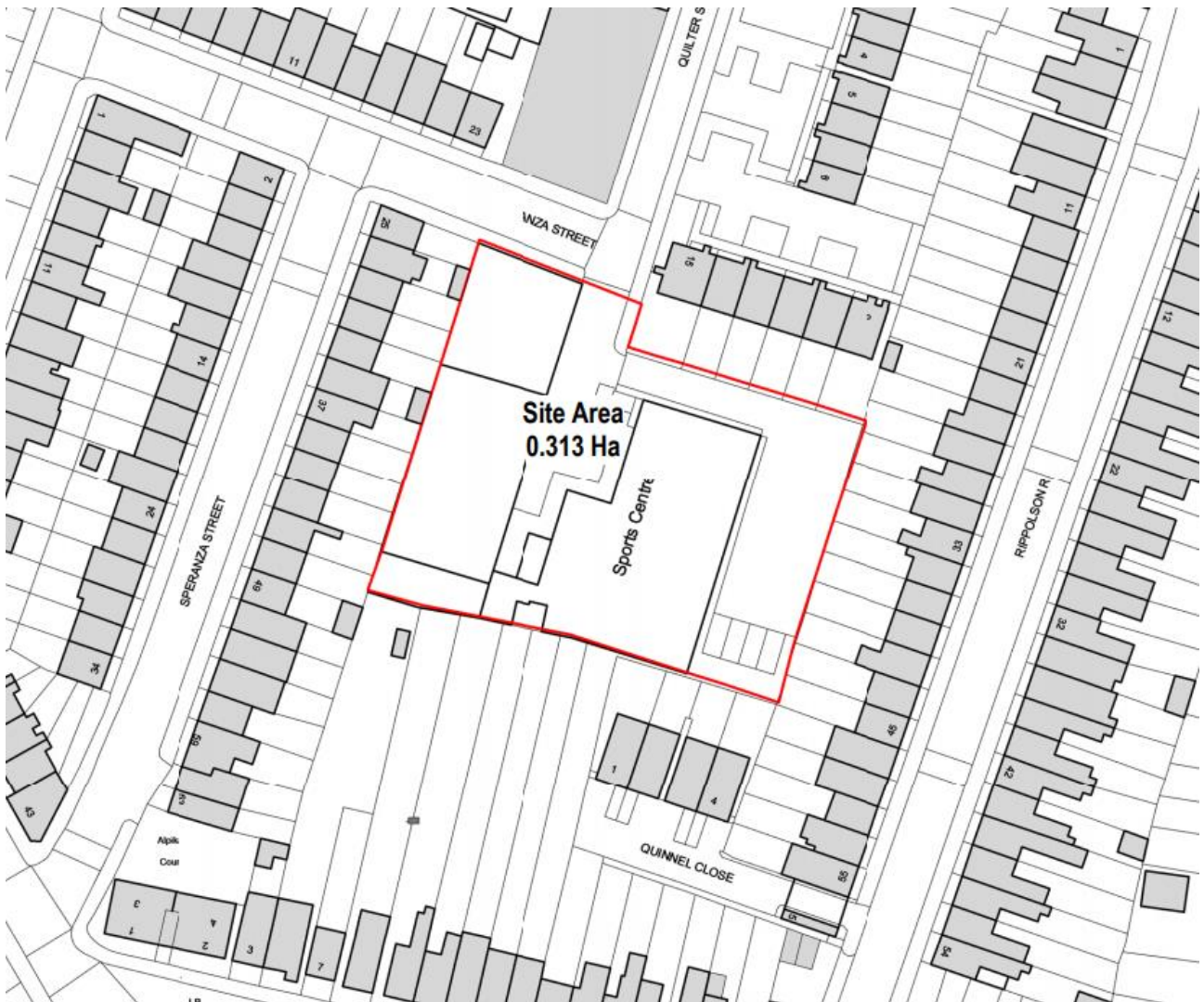


Figure I Site Location Plan

4.4 The area surrounding the development consists of mainly residential development, with the site bound by dwellings on Speranza Street, Saunders Road, Quinell Close and Rippolson Road. The typology of dwellings consists of terraced blocks set on a regular building line which comprise a traditional palette of materials. This creates a cohesive and uniform character. There is also one statutory listed building (Grade II - Plumstead Library) and five locally listed buildings as shown in the below figure located along Plumstead High Street.



Grade II Listed Buildings

1. Plumstead Library (No. 232)

Locally listed

2. 236 (former Health Centre)
3. 240-242 (former Horse & Groom PH)
4. 244 (former Prince of Orange PH)
5. 200 Plumstead Police Station
6. 30 Bannockburn Primary School

Figure 2 Nearby heritage assets

- 4.5 The character of the area changes towards the north with the Plumstead Centre situated on the opposite side of the highway, which houses both a library and a leisure centre (providing dance classes; badminton; fitness classes; football; gym; soft play and tennis).
- 4.6 The site has a PTAL rating of 3 (on a scale of 1-6 with 6 being the highest) and is also located within a Flood Risk Zone of 1 which indicates a low risk of flooding from river and fluvial sources.
- 4.7 The site is not located in a conservation area.

5.0 Proposal

- 5.1 The proposed development is for the construction of 17 dwellings comprising the below unit mix.

Housing		
Units proposed	17	
Unit Mix	1b/2p (2)	2 flats
	2b/4p (10)	8 (2 storey townhouses) 2 (2 storey wheelchair accessible townhouses)
	4b/7p (5)	5 (3 storey townhouses)

Table 1 Proposed accommodation schedule

- 5.2 Two 2-bedroom 4 person wheelchair houses are proposed and would be built to M4(3)b accessible standards which would be fit for wheelchair users from occupation. The remaining development would be constructed to M4(2) wheelchair accessible standards.
- 5.3 Fourteen (14) parking spaces (including 2 blue badge space) and 35 cycle parking spaces are also proposed together with 118sqm of play space (for age groups 0-11). The sub- station would remain as existing.

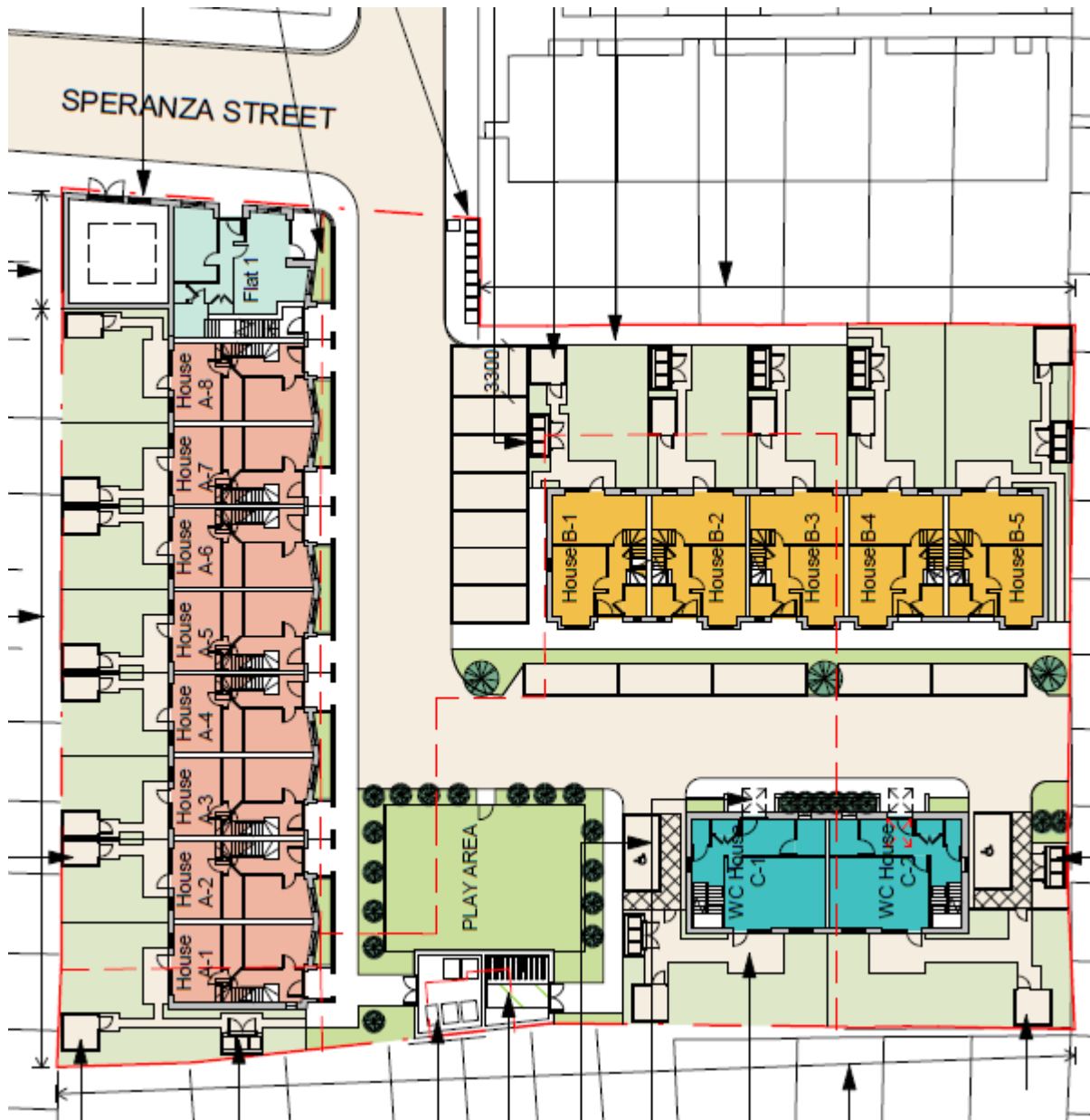


Figure 3 Proposed ground floor plan

- 5.4 All units would be provided at London Affordable Rent (LAR) and would be managed by the Council.

- 5.5 The buildings would be constructed in dark clay brick with a contrasting buff brick, grey roof tiles, light brown aluminium windows and doors and metal capping to parapets, balustrades, canopies and rainwater goods.



Figure 4 Proposed view looking north

6.0 Consultation

6.1 Statutory Consultees

A summary of the consultation responses received along with the officer comments are set out in table below:

Details of Representation	Summary of Comments	Officers comments
Metropolitan Police	No objections subject to securing a condition requiring the development achieve a secure by design accreditation.	A condition has been included in the recommendation (See Appendix 2 for the full wording)
Fire Department	No objections.	The proposed development would be subject to building regulations fire safety requirements, and this is acceptable

Thames Water	No objections	Informatives have been included (refer to Appendix 2).
EDF Energy	No comment	Noted.

6.2 Council Departments

A summary of the consultation responses received along with the officer comments are set out in table below:

Details of Representation	Summary of Comments	Officers comments
Waste Services	No objections.	Noted
Design	No objections	Noted
Conservation	No objections	Noted
Housing	Application is supported including 100% affordable housing and housing mix.	Considerations relating to affordable housing are assessed in section 10 of this report.
Environmental Protection (Air Quality, Noise and Ground Conditions)	No objections subject to securing conditions relating to air pollution, noise and land remediation measures,	These conditions will be imposed on any grant of planning permission (Refer to Appendix 2 for the wording).
Occupational Therapist	Acceptable in principle, no objections subject to confirming detailed layouts at design stage which would be secured by condition.	Conditions have been included to ensure the development meets the accessible design requirements (Refer to appendix 2 for the full wording of these).
Flood Risk	No comment	The site is at low risk of flooding. The SUDs measures including use of permeable paving are considered to be acceptable.

Sustainability	95% carbon reduction should be increased to 100%. Conditions should be secured to ensure that construction works would not impacts birds and bats, or impacts would be mitigated.	A carbon offset payment of £2,136.96 would be secured by Directors' Agreement which would be acceptable. Further details regarding carbon savings and future connection to offsite heat networks are proposed in Appendix 2.
Transportation and Highways Officer	No objections subject to securing contributions. There is sufficient parking provided on site in the wider area to accommodate existing and proposed parking need. The area is also no indication that the area is subject to highways safety risks.	Issues relating to Transportation are assessed in section 15 of this report. Contributions will be secured via a Directors' Agreement Conditions are proposed in Appendix 2.

6.3 Public Consultation

A total of 123 letters were sent to surrounding properties. The application was published in the local press and a site notice was also displayed near the site. Two (2) objections have been received which are summarised below.

6.4 Amenity groups comprising Positive Plumstead Project and Friends of Plumstead Common were also consulted and no comments were received.

Summary of Comments	Officers comments
<ul style="list-style-type: none"> Impact on privacy, development is intrusive and impact on quality of life 	<ul style="list-style-type: none"> The proposed separation distances, together with location of main habitable rooms at ground floor would mitigate significant impacts on neighbouring amenity
<ul style="list-style-type: none"> Amount of homes is too high and impact on parking 	<ul style="list-style-type: none"> The number of homes is appropriate for the site and all space standards are met. Parking provided is within policy guidelines and the proposal would not cause harm to the highways

	network or parking stress in the area
<ul style="list-style-type: none"> • Not all people are online 	<ul style="list-style-type: none"> • The Council has met all statutory consultation and publication guidelines

7 Planning Context

7.2 This application is considered in accordance with national, regional and local planning policies and Supplementary Planning Guidance / Documents.

- **National Planning Policy Framework (NPPF – 2021)**
- **National Planning Practice Guidance**
- **Planning (Listed Buildings and Conservation Areas) Act 1990**
- **Technical Housing Standards – Nationally Described Space Standard (Department for Communities and Local Government – March 2015)**
- **The London Plan (March 2021)** - Full details of relevant policies refer to Appendix 3.
- **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” – 2014)** - Full details of relevant policies refer to Appendix 3.
- For full details of relevant SPD / Documents refer to Appendix 3.

8 Material Planning Considerations

8.2 This section of the report provides an assessment of the proposed development and the principal issues that need to be considered in the determination of the planning application (Ref: 21/0510/F):

- Principle of Development (section 9)
- Housing (section 10)
- Heritage and Design (section 11)
- Impact on neighbouring amenity (section 12)
- Standard of Accommodation (section 13)
- Environmental Health (section 14)
- Transport and Highways (section 15)
- Biodiversity (section 16)
- Sustainability (section 17)
- Mayoral Community Infrastructure Levy (MCIL) (section 18)
- RBG CIL (section 19)
- Directors’ Agreement (section 20)
- Implications for Disadvantaged Groups (section 21)

- Equalities Statement (section 22)
- Conclusion (23)

9 Principle of Development

Loss of Leisure Centre

- 9.2 The loss of the D1 use now covered by Classes E(d), F1 and F2 of The Town and Country Planning (Use Classes) Order 1987 (as amended) is assessed against Core Strategy policy CH(a) (loss of community facilities) and EA(a) (Local Employment Sites) which seek to protect such uses.
- 9.3 The site was formerly known as The Warehouse Sports and Performing Arts Centre and contained a number of indoor sports and leisure facilities. These facilities have been relocated to the adjacent site to the north at the Plumstead Centre as part of the 2017 permission (17/2879/F). As such the principle of development is accepted as the leisure centre uses have already been re-provided and there would be no loss of employment or community facilities.

Residential use

- 9.4 The National Planning Policy Framework (NPPF) requires the delivery of a wide choice of high-quality homes and to boost significantly the supply of housing. The Core Strategy (2014) sets a housing delivery target of 2,595 per year with the London Plan setting a target of 2,824 per year.
- 9.5 There are also 20,000 households on the Council waiting list across 1-bed units, 2-bed units and family housing. It is clear therefore that there is significant demand for housing and in particular affordable rented housing across the borough which is not currently being met.
- 9.6 The proposed 17 affordable residential units would make a valuable contribution to the delivery of additional housing within Greenwich, of which there is a significant demand, boosting the supply of housing in accordance with the NPPF in accordance with the objectives of the London Plan and Royal Borough of Greenwich's (RBG) Core Strategy. The principle of residential development is therefore accepted.

10 Housing

- 10.2 Policy H2 of the Core Strategy encourages a full range of housing choice and policy H3 states that affordable housing should be provided for developments of 10 or more.
- 10.3 The proposed scheme consists of 17 residential units and are 100% affordable units provided at London Affordable Rents. They would also be made available to residents on the Council's Housing Register. This is acceptable and would contribute greatly to addressing the significant housing need in the borough.
- 10.4 The proposed development comprises 2 x 1 (12%), 10x2 (59%) and 5 x 4-bedroom units (29%). This mix is considered to be acceptable and would provide an appropriate level of family housing and smaller units.
- 10.5 The proposed development also includes 2x 2-bedroom 4 person wheelchair accessible units (10%) built in accordance with part M4(3)(2)(b) of current building regulations. These units would have ground floor access, with wheelchair accessible parking. This is welcomed and would be in compliance with local plan policies.
- 10.6 The proposed housing mix and tenure is therefore considered to be acceptable and the high level of affordable housing and family units is welcomed.

11 Heritage and Design

- 11.1 The NPPF, Policies D3, D4 and D5 of the London Plan (2021) and policies H(c) and DH1 of the Core Strategy (2014) requires new dwellings to be of high quality and enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape.
- 11.2 In accordance with the council's statutory duties under sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is necessary to have special regard to the desirability of preserving the listed buildings and their settings. London Plan (2021) policy D1 expects new developments to respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to local character.

- 11.3 The site comprises two depot-style blocks in an industrial aesthetic of fletton bricks and distinctive saw-tooth roof profiles and some minor single storey infills. The surrounding area is a mix of 2 storey residential terraced properties with pitched roofs with varying facing materials of brick, render and pebble dash. Further north of the application site are larger civic buildings and flats approximately 3-4 storeys in height including the Plumstead Centre and Police Station.
- 11.4 The proposed development comprises a 2-storey terrace of 10 dwellings, another shorter terrace of 5 dwellings and a 2-storey semi-detached pair. The proposed building heights are comparable to the surrounding dwellings in the area and would also replicate the layout of terraces with rear gardens and main access from the street. The use of pitched roof slopes matching the surrounding properties and varying tones of red and buff brick would also ensure that the proposed development would complement the existing character.
- 11.5 The proposed development would be visible from very limited public views on Speranza Street and Quilter Street to the north however the overall 2/ 3 storey height, complimentary roof form and use of brick would not introduce an incongruent element to the street scene and compared to the existing warehouse would be an improvement. Due to the limited views and reduced massing in comparison to the existing warehouses the proposed development would also not impact the setting of the nearby Grade II listed library or locally listed buildings.



Figure 5 Proposed CGI looking west

- 11.6 With regards to layout, the proposed buildings are arranged to create as much active frontage as possible with a playspace area and parking provided on adjacent bays to replicate the street layout of the surrounding area.
- 11.7 Conditions are recommended for details of materials to ensure that they are of an acceptable quality (refer to Appendix 2 for the full wording).
- 11.8 The proposed development is considered to be of a high-quality design and the layout, scale, bulk and massing would integrate well with the existing and proposed surrounding development.
- 11.9 For these reasons the design of the proposed development and its impact on the townscape is considered to be acceptable and complies with relevant national and local policies.

12 Impact on neighbouring amenity

- 12.1 Core Strategy (2014) Policies H5, DH(b) and Policies D3, D6, D14 and D14 London Plan (2021) states that it must be demonstrated that the proposed development does not cause an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight or privacy they enjoy, or result in an unneighbourly sense of enclosure, loss of privacy or overbearing impact.

Privacy, Overbearing and Sense of Enclosure

- 12.2 As shown in the below figure, the proposed development would be located 14m- 17.5m from the properties to the east at 25-47 Speranza Street, 19.7m from the properties to the north at 9- 15 Quilter Street, 13.9m- 15.2m from the properties to the east at 29- 45 Rippolson Close and 15.9m- 50m from the properties to the south at 1- 5 Quinnet Close and Saunders Road beyond.

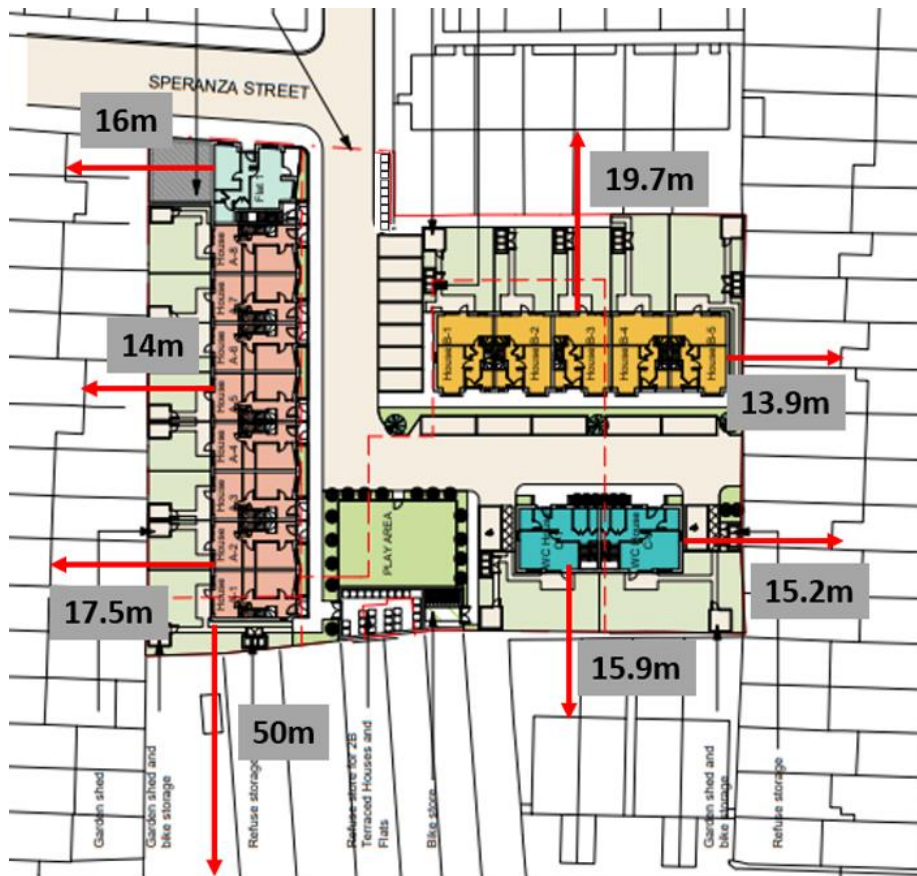


Figure 6 Proposed separation distances

12.3 Overall, the proposed separation distances and layout which places main habitable rooms on the ground floor would be sufficient to mitigate any significant overbearing impacts and loss of privacy to the properties located to the north south and east located at 25- 47 Speranza Street, 9- 15 Quilter Street and 1- 5 Quinell Close and Saunders Road.

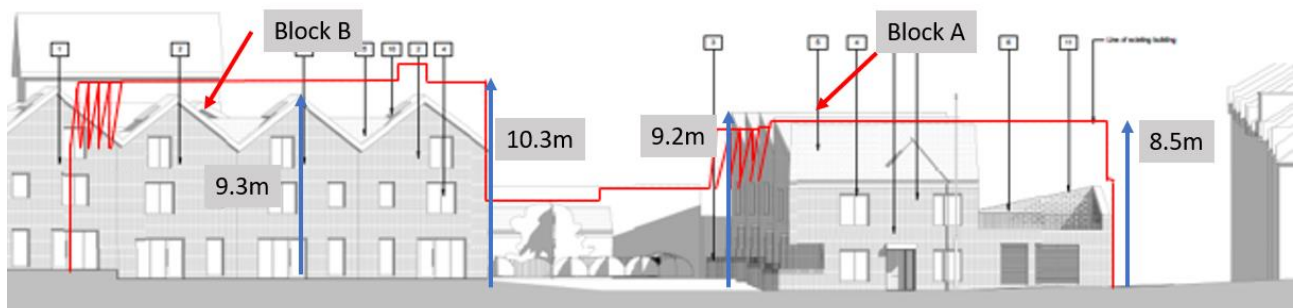


Figure 7 Existing and proposed building heights

12.4 Block A would be up to 0.7m taller than the existing warehouse buildings, however it should be noted that the proposed dwellings would be located 6.9m further from the southern boundary with the properties at 25- 47 Speranza Street in comparison to the existing warehouses and this would be a significant improvement to the existing relationship.

- 12.5 To the east at 29- 45 Rippolson Close the proposed development would be located 13.9m and 15.2m from the rear wall, with Block B abutting the rear garden boundary. There would be some increased visual impact here however this would not be significant enough to warrant a reason for refusal and the impact would also be mitigated by the incorporation of pitched roof slopes and separation distance of 13.9m.
- 12.6 Whilst it is acknowledged that the proposed development would be visible from the surrounding residential properties and there would be some visual impact, the proposed separation distances would prevent any significant privacy, overlooking, overbearing and sense of enclosure and existing residents would have a good level of visual amenity.

Daylight and Sunlight

- 12.7 Thirty (30) properties as listed in the below figure have been tested for daylight and sunlight impacts. The properties were assessed in accordance with BRE's guide Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice (2011).



1. 29 – 45 Rippolson Road
2. 1 – 5 Quinnel Close
3. 21 & 23 Speranza Street
4. 25 – 47 Speranza Street
5. 9 – 15 Quilter Street

Figure 8 Properties tested for Daylight and Sunlight

Daylight

- 12.8 For calculating daylight to neighbouring properties affected by a proposed development, the primary assessment is the vertical sky component (VSC) method of assessment together with the no skyline (NSL).
- 12.9 The VSC test measures the amount of sky that is visible to a specific point on the outside of a property, which is directly related to the amount of daylight that can be received. It is measured on the outside face of the external walls, usually at the centre point of a window. The test should be applied to the main window of each habitable room.
- 12.10 The NSL test calculates the distribution of daylight within rooms by determining the area of the room at desk / work surface height (the 'working plane') which can and cannot receive a direct view of the sky and hence 'sky light'.
- 12.11 For the above methods, the guidance suggests that existing daylight may be noticeably affected by new development if:
- Windows achieve a VSC below 27% and are reduced to less than 0.8 times their former value; and
 - Levels of NSL within rooms are reduced to less than 0.8 times their former values.

Sunlight

- 12.12 The BRE guide explains that obstruction to sunlight may become an issue if:
- Sunlight refers to the amount of direct light received by the sun. In accordance with the BRE Guide, only windows belonging to main habitable rooms i.e., living rooms facing within 90 degrees of due south are assessed.
 - The BRE establishes that the sunlight availability of the buildings may be adversely affected if the windows receive less than 25% of Annual Probable Sunlight Hours (APSH) or less than 5% Winter Probable Sunlight Hours (WPSH).
- 12.13 All windows and rooms tested for daylight and sunlight would pass BRE guidelines for daylight and sunlight.

Overshadowing

- 12.14 BRE guidance states that at least 50% of open spaces should receive 2 hours of sunlight on 21st March.
- 12.15 All amenity spaces tested would receive 2 hours of sunlight on 21st March to 50% of the area.

Conclusion

- 12.16 As there would be no significant effects to neighbouring properties in terms of impact on daylight, sunlight and overshadowing the proposed development is acceptable and would be meet BRE criteria.

I3 Standard of Accommodation

Space Standards

- 13.1 Policy D6 of the London Plan (2021), Core Strategy Policy H5 (2014), The Mayor's Housing SPG (2016) and the Nationally Described Space Standard's (2015) requires housing developments to be of the highest quality internally and externally and either meet or exceed minimum space standards.
- 13.2 Policy H5 of the Core Strategy (2014) and Policy D7 of the London Plan (2021) requires 10% of the dwellings to be built to full wheelchair standards detailed in Building Regulations requirement M4 (3) 'wheelchair user dwellings' and that that 90% of units meet Building Regulations requirement M4 (2) 'accessible and adaptable dwellings'.
- 13.3 All of the proposed homes in the development would meet the minimum space standards. All units would also have access to private amenity space in the form of private gardens or balconies.
- 13.4 Two units would be secured as wheelchair accessible units under Building regulations part – M4(3)(2)(b) and designed to be accessible units from occupation with the remaining units built at M4(2) standards.
- 13.5 The Council's Housing Occupational Therapist has reviewed the layouts of the proposed dwellings and in principle agree that the requirements can be met. Full details would be secured by condition.
- 13.6 Officers also consider that the internal daylight/sunlight would be acceptable given that all units are dual aspect, the surrounding properties are of a 2

storeys and there are sufficient separation distances to mitigate significant obstructions to window.

- 13.7 This is acceptable and officers are satisfied that the proposed development would meet all of the required internal space standards.

Play Space

- 13.8 Policy D6 of the London Plan (2021), The Mayor of London's Play and Informal Recreation SPG (2012) and Policy H(e) of the Core Strategy (2014) requires all residential development provide private amenity space and children have access to good quality, well designed, secure and stimulating play opportunities.

- 13.9 The total area of play space proposed is 118m² (ages 0-11) with a total requirement of 265m². The shortfall of 147m² (12+) is proposed to be mitigated by a financial contribution of £10,000 which would go towards the provision of suitable play equipment/ playspace enhancements for children aged 12+. Given that Winn Common and St Nicholas Gardens are within 0.4 miles of the site and would provide alternative playspace within a suitable walking distance, these mitigation measures would be acceptable.

- 13.10 Full details of playspace and equipment would be secured by condition to ensure that the proposed playspace is of high quality and suitable for the proposed age groups.

- 13.11 The proposed development is and therefore acceptable with regards to the proposed playspace.

14 Environmental Health

Land Contamination

- 14.1 Policy E(e) of the Core Strategy states where contamination is found, development must be built and occupied safely without any adverse environment or health impacts.
- 14.2 The submitted preliminary risk assessment has identified that the potential for significant and widespread contaminative impact to be low, however, a potential for localised impact remains. As such, it is recommended that measures are secured for further intrusive exploratory investigation at the site to address any risks identified and to address remaining uncertainties

- 14.3 The Local Planning Authority is satisfied that the submitted preliminary risk assessment demonstrates that the contamination risks could be satisfactorily reduced for the intended residential use of the site. There is nothing in the report to suggest that the site could not be fully remediated subject to appropriate conditions. Conditions are recommended and detailed in the appendix 2 of the main report which would ensure that there would not be a significant risk to human health or the environment during the decontamination and remediation of the site, or to the site's occupants once the authorised development has completed and is in occupation.
- 14.4 Subject to details of further investigative measures remedial works the proposed development is acceptable with regards to land contamination.

Flood Risk and Drainage

- 14.5 Policy E2 of the Core Strategy (2014) states that The Royal Borough's Strategic Flood Risk Assessment must be used to inform development and reduce flood risk in Royal Greenwich by demonstrating consideration of all forms of flood risk by preparing flood risk assessments, in line with advice from the Environment Agency.
- 14.6 A drainage strategy and flood risk assessment has been submitted as part of the application documents.
- 14.7 The site is located in a flood risk zone of 1 and therefore has a low risk from fluvial and surface water flooding. Through the use of permeable paving, surface water drainage would also be successfully managed which would slow down flow rates and mitigate surface water flooding.
- 14.8 The proposed development would therefore not be at risk from flooding or significantly impact surface water drainage and is acceptable.

15 Transport and Highways

- 15.1 London Plan (2021) policies T5 and T6 set out vehicle and cycle parking's standards for residential dwellings. A maximum number of 17.25 spaces is recommended for the application site which has a PTAL rating of 3.
- 15.2 Core Strategy policy IM(b) and (c) and policies T3 and T4 of The London Plan (2016) also seeks to prevent negative impacts upon the highways network.
- 15.3 A total of 14 car parking spaces including two blue badge space are proposed together with 35 cycle parking spaces. This is acceptable and in compliance with minimum parking and cycle standards. Due to the moderate number of

units proposed the impact on local parking stress levels and wider road network would also not be significantly impacted.

- 15.4 Refuse and servicing would be carried out from Quilter Street at the entrance to the site with bins either collected from communal bin stores located within the site and towards the entrance. No objections are raised to this, and the Council's refuse and highways officers have reviewed the delivery and servicing details and raise no objections. The proposed development is therefore acceptable with regards to deliveries and servicing.
- 15.5 A Demolition/Construction Method Statement would also be secured by condition together with a construction noise impacts condition limiting hours of demolition and construction to 08:00 to 18:00 hours Monday to Friday, and 08:00 to 13:00 hours on Saturdays, with no noisy working audible at the site boundary being permitted on Sundays or Bank Holidays. An informative requiring reference to the Councils' Construction Site Noise Code of Practice would also be attached to the application.
- 15.6 The following contributions would be sought with regards car club memberships and cycle training.
- Cycle Contributions- £340
 - Car Club Contributions- £5,100
- 15.7 Appropriate levels of parking on site have been provided in accordance with London Plan standards as well as cycle storage. The scheme would also not significantly impact the local highways network due to the low number of units proposed. As such the proposed development is acceptable with regards to highways and transport impacts.

16 Biodiversity

- 16.1 Policies G5, G6 and G7 of the London Plan (2021) and policy OS4 of the Core Strategy (2010) seek wherever possible to ensure that development makes a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 16.2 The submitted preliminary ecological appraisal has identified that the majority of the site is comprised of buildings and a concrete hardstanding car park with some trees on the southern boundary and vegetation on walls. Evidence of bat and birds was also recorded.
- 16.3 Conditions securing bat surveys and appropriate clearance of vegetation with regards to breeding birds are recommended in appendix 2. Should birds or bats be found on site, mitigation measures would be required to be submitted

to the local planning authority in order to ensure that these habitats are not lost or are suitably replaced. Habitat enhancements including bird and bat boxes are also proposed which are welcomed.

- 16.4 Seven (7) trees located on the southern eastern corner of the site are to be felled. These trees are of low quality and do not contribute to the visual amenity of the area. Nineteen (19) trees are proposed to be planted in their place and this would mitigate and enhance the biodiversity value of the site. This is in addition to planting, hedges and grassed areas which would further improve the biodiversity value of the site.
- 16.5 The improved biodiversity measures are acceptable and would result in an enhancement to the current situation with suitable measures secured by condition to protect birds and bats if present.

17 Sustainability

Energy

- 17.1 The NPPF and the London Plan (2021) Policy SI 2 seeks an overall reduction in carbon dioxide emissions whilst Policy SI 2 and Royal Greenwich Policy EI state proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the energy hierarchy.
- 17.2 Baseline emissions have been assessed for Building Regulations 2013 Part L1A and Part L2A. To comply with Royal Greenwich Local Plan and London Plan policies the domestic component of the proposed scheme will have to meet zero carbon and the non-domestic element, a minimum reduction onsite of 35% in regulated CO2 emissions over Building Regulations 2013 Part L.
- 17.3 The proposed development would achieve a reduction in CO2 emissions of 95% above the minimum 35% required by Part L 2013. This has been achieved by proposed passive design measures, centralised heating and hot water systems in the form of ASHPs and a 20.4kWp solar PV system. £2,136.96 would be secured via a Directors' Agreement in light of the shortfall. This is acceptable and given the minor shortfall and in compliance with policy.
- 17.4 Water efficient sanitary fittings in all residential units targeting an internal water consumption rate of 105 l/p/d would also be secured by condition.
- 17.5 This is acceptable and officers raise no objections to this element of the proposal.

18 Mayoral Community Infrastructure Levy (MCIL)

- 18.1 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policy T9. The Mayoral CIL formally came into effect on 1st April 2015, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL2 will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands.
- 18.2 The current application is liable to this requirement however as the proposed development is for affordable housing the scheme would be liable for relief.

19 RBG CIL

- 19.1 The Royal Borough adopted its Local Community Infrastructure Levy (CIL) charging schedule, infrastructure (Regulation 123) list, instalments policy and exceptional circumstances relief policy on the 25th March 2015 and came into effect in Royal Greenwich on the 6th April 2015.
- 19.2 The application is liable to this requirement, however as the proposal is for affordable housing would be eligible for an exemption.

20 Public Sector Equality Duty (PSED) and Human Rights

- 20.1 Under the Equalities Act 2010, the Council must have due regard to the need to eliminate discrimination, harassment or victimisation of persons by reason of age, disability, pregnancy, race, religion, sex and sexual orientation. This planning application has been processed and assessed with due regard to the PSED. The application proposals are not considered to conflict with the Duty.
- 20.2 The application has also been considered in the light of the Human Rights Act 1998 and it is considered that the analysis of the issues in this case, as set out in this report and recommendation, is compatible with the Act.

21 Implications for Disadvantaged Groups

- 21.1 The implications for disadvantaged groups identified below are an integral part of the consideration of the development and community benefits as set out in the report:
- Delivery of 17 much needed affordable housing units provided at London Affordable Rents,

- 2 accessible wheelchair units built in compliance with M4(3)(2)(b) building regulations

22 Directors' Agreement

- 22.1 This planning application has been submitted by the Council which is also the determining local planning authority for the application. Since it is not possible legally to bind the applicant via a S106 legal agreement, it has been agreed that as an alternative to this, a letter and memorandum of understanding between the proper officer representing the housing authority as owner of the land, and the proper officer representing the local planning authority, will be agreed, should the planning application receive a resolution to grant. The letter and memorandum of understanding ('Directors Agreement') will include the contributions and other obligations listed below.
- 22.2 The proposal seeks to deliver 100% affordable housing at London Affordable Rents, which will meet those in greatest housing need and taken directly from the Council's waiting list. In light of the housing authority land and long-term funding being contributed towards delivering a 100% affordable housing scheme, officers consider that such contributions carry weight in the overall planning balance of the scheme such that requirements outlined in the Planning Obligations SPD that would otherwise have been sought, including employment are not required in this instance. Given the benefits of a 100% affordable scheme, the public subsidy being used to deliver it over the long term, the priority of delivering much needed affordable housing outweighs such other mitigation. Mitigation measures have focused on those issues required to ensure a quality scheme which provides mitigation measures directly related to the proposal and in this instance relate to transport which are listed below.
- 22.3 A number of site-specific contributions are considered necessary to make the development acceptable in planning terms, directly related to the development, and are fairly and reasonably related in scale and kind to the development, in line with Regulation 122 of the Community Infrastructure Levy Regulations. These contributions, to which the applicant has agreed, are set out below and will be included in the Directors Agreement.

22.4 Directors' Agreement – Heads of Terms

Affordable Housing

- a) Provision of 17 Affordable Housing Units (Affordable) consisting of the following mix;

	1 Bed	2 Bed	2 Bed	4 Bed	Total
London Affordable Rent	2	8	2 (W/A)	5	17

- b) The use of the affordable units for the purposes of affordable rented housing only and for no other purposes;
- c) The occupation criteria for tenants, and
- d) Measures to keep service charges for tenants to a minimum.

Transport

- Playspace Contribution- £10,000
- Cycle Contributions- £340
- Car Club Contributions- £5,100
- Carbon Offsetting Contribution- £2,136.96
- Total- £17,576.96

Conclusion

22.5 The application is for 17 London affordable rented homes. This would make a valuable contribution to the delivery of additional housing within Greenwich, in of which there is a significant demand. It is also considered that the design of the development would secure a high-quality living environment and would contribute to the redevelopment of the area.

22.6 Accordingly, it is recommended that permission be granted for application reference 21/0510/F, in line with Section I of this report.

Background Papers:

National Planning Policy Framework (2021)

National Planning Practice Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

Technical Housing Standards – Nationally Described Space Standard (Department for Communities and Local Government – March 2015)The London Plan (2021)

Mayors Housing SPG (2016)

Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)

Accessible London: Achieving an inclusive environment SPG (October 2014)

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