

Greenwich Area Planning Committee 26 May 2021	Agenda Item: 6 Reference No: 20/3873/F
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Applicant: Reefmark Ltd
Agent: GHIL

Site Address: 43-81 Greenwich High Road, Greenwich SE10 8EW	Ward: Greenwich West Application Type: Full Planning Application
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I. Recommendation

I.1 The Committee is requested to grant planning permission as outlined below:

- Replace existing timber cladding on balconies, balustrades, louvres and facades to Blocks B, C and F with powder coated aluminium cladding.

subject to:

- i. Resolve to grant conditional planning permission according to the conditions in appendix 2 to be detailed in the notice of determination.
- ii. Authorise the Assistant Director of Planning & Building Control to:
 - a. make any minor changes to the detailed wording of the recommended conditions as set out in this report and its addendums, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice.

2. Summary

2.1 Detailed below is a summary of the application:

The Site -	
Site Area (m ²)	Approximately 10,500m ²
Heritage Assets	The application site lies within the setting of the Grade II Listed Sewage Pumping Station and Coal Sheds and sits

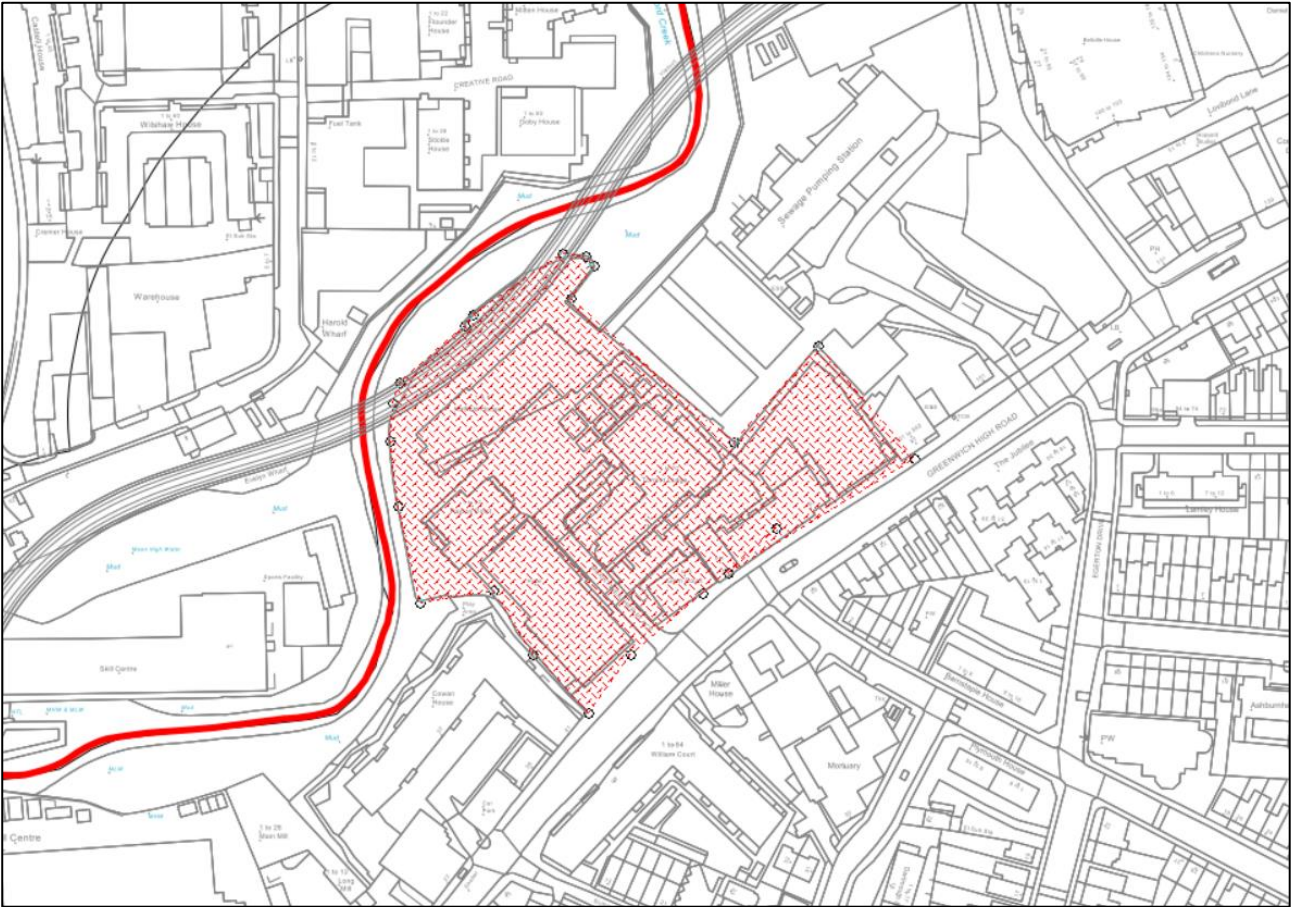
	opposite Ashburnham Triangle Conservation Area.
Tree Preservation Order	N/A
Flood Risk Zone	Flood Zone 3 benefiting from flood defences

Transportation		
Public Transport	PTAL Rating	Part 0, 3 & 5

Public Consultation	
Number in Support	1
Number of objections	29
Main issues raised (addressed within section 6.5 of the report)	<ul style="list-style-type: none"> • Cost implications of work for tenants/leaseholders. • Residential amenity impacts during construction works • Consultation of planning application to resident

- 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; subject to the recommendation set out in section 1.1 of this report and the conditions set out in appendix 2.

Site Plan



3. Site and Surroundings (in detail)

- 3.1 The application site comprises 6 multi-storey buildings.
- 3.2 The site sits between the grounds of the Greenwich Pumping Station to the north-east and the four-storey serviced apartments at 65-81 Greenwich High Road to the south-west.
- 3.3 Immediately to the north-east is a single-storey substation, included within the grounds of the Pumping Station, with the wider grounds generally open but with one and two storey buildings used as offices. To the immediate north of the site is a three-storey residential dwelling, and beyond that to the north, are the Grade II Listed Sewage Pumping Station and Coal Sheds.
- 3.4 To the south and west of the application site, on the southern side of Greenwich High Road, is Ashburnham Triangle Conservation Area, which is

characterised by mainly residential Georgian and Victorian properties. There is a mix of house styles and sizes within the Conservation Area, but most buildings are three-storey, or two-storey with basement, and the area has a verdant character as a result of an abundance of street trees and garden trees.

- 3.5 Greenwich High Road has a relatively mixed character, with a significant level of variation in terms of height and massing along its length. Whilst the immediate vicinity of Greenwich High Road is generally characterised by two and three storey buildings, more recent developments have included five and six storey buildings fronting Greenwich High Road with consented buildings up to twelve storeys in height set back from the road.
- 3.6 The application site has been developed in pursuance of a planning permission that was granted in full in January 2008 when the reserved matters of outline consent (ref:06/0294/O) were approved. The outline consent related to the demolition of the existing buildings and the redevelopment of the site to provide a mixed-use scheme comprising a 102-bedroom hotel, 226 residential units (41 studio, 107 one bed, 69 two bed, 9 three bed) and commercial accommodation (consisting of B1, B1c and B8 use class). The outline planning application was refused planning permission but allowed on appeal in October 2006.
- 3.7 A subsequent application was then approved for the remodelling of approved Block E (consented under Outline and reserved matters approvals Refs: 06/0294/O and 07/2767/R), to include a foodstore (Class A1) and restaurant unit (Class A3) at ground floor level together with associated changes to the approved landscaping.

4. Relevant Planning History

- 4.1 04/1456/F Demolition of existing buildings and redevelopment to provide a hotel, 199 residential units (42 studio, 95 one bed, 55 two bed, 7 3 bed) and commercial floorspace B1 (Office and Light Industry) and B8 in 5 buildings up to 8 storeys in height, including associated access, excavation, parking and landscaping. A planning appeal was lodged against the non-determination of this planning application. On the 15th November 2005 the Council ratified the grounds on which the Council defended the planning appeal against the non-determination of this application.

4.2 06/0294/O Outline Planning permission for the demolition of the existing buildings and the redevelopment of the site to provide a mixed-use scheme comprising a 102-bedroom hotel, 226 residential units (41 studio, 107 one bed, 69 two bed, 9 three bed) and 8,075 square metres industrial floor space in Class B1 (Office and Light Industry) and B8. The external appearance, landscaping, siting and design of the development were matters reserved for future consideration. Refused on 5th April 2006.

4.3 The applicant lodged an appeal against the above refusals in section 4.1 and 4.2 of this report and a public inquiry was held, which considered both applications together. Both were allowed on appeal subject to conditions. In concluding the Planning Inspector made the following summary:

“The proposals would provide for a gain in employment and substantially more intensive use of an under-used site. Mixed use complies with the general local policy aspirations for the area, and with the regeneration objectives of the London Plan. There would be significant gain in residential accommodation that would contribute to meeting wider housing requirements, with the proposed levels of affordable housing a strong factor in favour of the schemes. I consider that acceptable living conditions would be created, and that there would be no harm to the area’s character and appearance, highways conditions or the environment. I have found a hotel to be an appropriate part of a mixed use in this location.

In these respects, I consider that no significant harm would result from the relatively intensive nature of the developments or the other conflicts with policy. The benefits of a more intensive mixed-use development including significant residential floorspace are recognised in the support in principle from the Mayor. In my opinion the absence of harm and the benefits of the proposals are considerations that outweigh the specific conflicts with policy and warrant approval of the developments.”

4.4 09/2186/R Submission of reserved matters pursuant to Conditions 1 & 2 (Design and External Appearance) of Appeal Decision (Appeal B) of the Secretary of State dated 11/10/06 (Planning Ref:06/0294/O) for the demolition of buildings to provide a mixed use development consisting of commercial floorspace B1, B8, hotel and 227 residential units. Approved 4th December 2009.

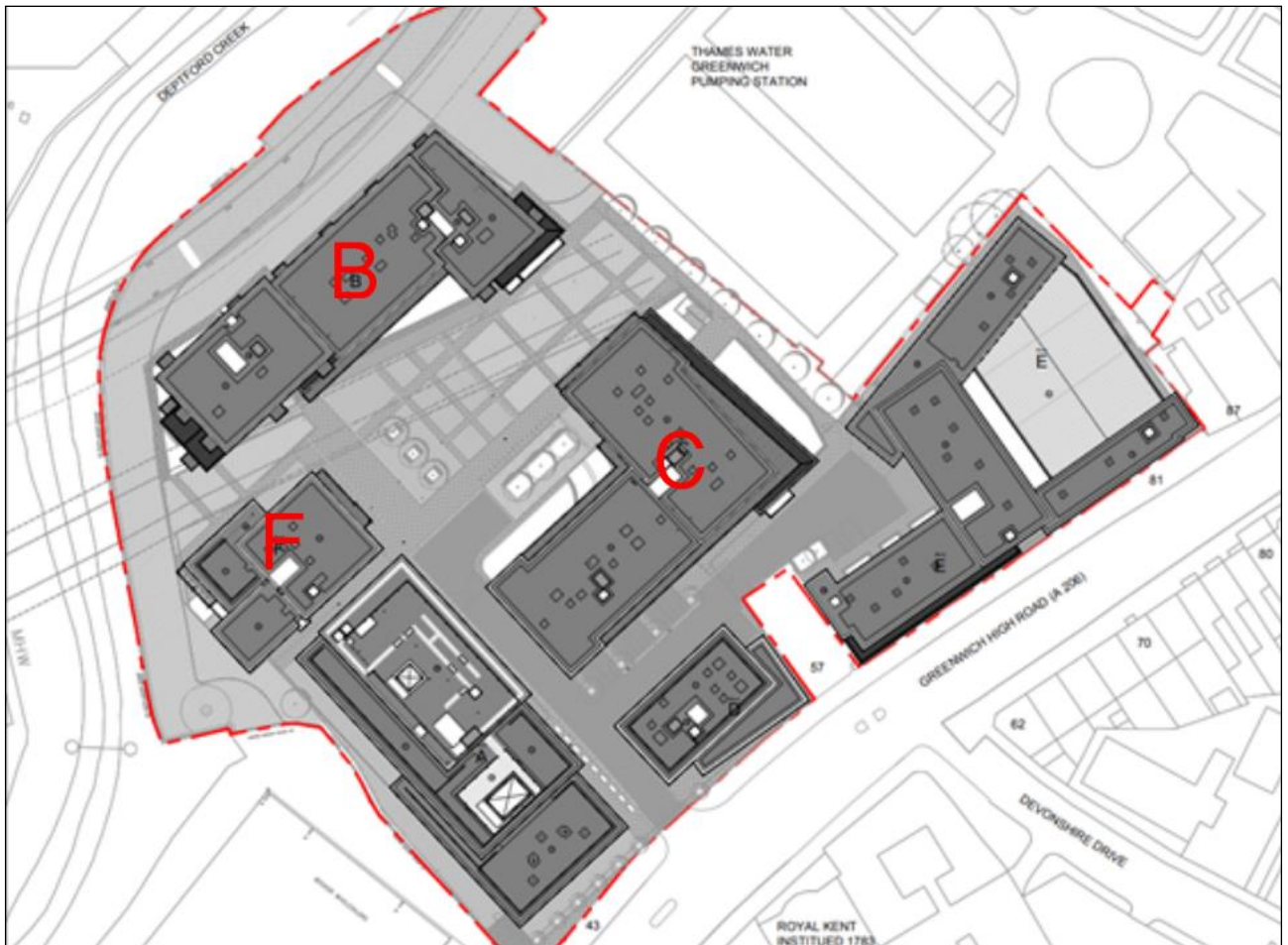
- 4.5 09/0092/ F Construction of a 150 room hotel in a seven storey building in substitution for the 102 room hotel (approved under Outline planning permission dated 11.10.06 Ref. 06/0294/O and reserved matters dated 30.012008 Ref.07/2767/R for a mixed use development). Approved 7th April 2009.
- 4.6 09/2462/F Remodelling of approved Block E (consented under Outline and reserved matters approvals Refs:06/0294/O and 07/2767/R). To include a food store (Class A1) and restaurant unit (Class A3) at ground floor level together with associated changes to the approved landscaping. Allowed at appeal, decision date 17th August 2010.
- 4.7 11/2723/F Change of use of part ground and first floors of Block E (as approved by permission Ref:09/2462/F) to Gymnasium (D2) and construction of a 2-storey extension. Approved 9th March 2021.
- 4.8 12/1588/F Change of use of floorspace on part ground, part first and the entirety of the second and third floors from Office (Class B1/B1c) to 68 room Hotel (Class C1). Approved on 3rd December 2012.
- 4.9 14/1053/V Variation of condition 8 (Secured by Design) of planning permission dated 03/12/2012 ref: 12/1588/F to comply with as many measures as possible before occupation. Approved 28th May 2014.
- 4.10 There are also a number of submissions of detail applications relating to the site which have not been detailed here, however a full planning history can be located on the planning file.

5. Proposals (in detail)

- 5.1 The current application seeks full planning permission for the following:
- Replace existing timber cladding on balconies, balustrades, louvres and facades to Blocks B, C and F with powder coated aluminium cladding.
- 5.2 The application proposes a change of material to comply with the latest Government advice regarding cladding on high rise buildings.
- 5.3 No other amendments are being made to the proposal.

5.4 The development description has been amended since the public consultation to ensure it is more prescriptive of the proposed works and a fire statement has been provided. It is noted that the advertised proposal plans do detail the prescriptive works and the 'major site works notice' submitted with the application summarises the fire statement. Furthermore, the agent has provided letter which were sent through to residents in 2020 detailing the proposed works and included the fire statement. As such, it was considered that no re-consultation was necessary.

5.5 Site plan indicating the location of Blocks B, C and F subject to this application.



6. Consultation

6.1 The application since being submitted in December 2020 has been subject of 2 rounds of public consultation, comprising of a press notice, site notice and

255 individual letters, sent to individual occupiers of the affect buildings. This also included consultation with statutory bodies and local amenity groups.

6.2 It is noted that re-consultation was undertaken owing to additional plans being received during the application period and an updated development description to include reference to the adjacent Grade II Listed Buildings and the Ashburn Triangle Conservation Area.

6.3 Statutory Consultees

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

Details of Representation and date received	Summary of Comments	Officers comments
Historic England	No notification of Historic England required.	Noted.
London Fire Brigade	<p>An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for firefighting purposes, will be provided.</p> <p>This is without prejudice to any requirements or recommendations that may be made by the Authority under the Regulatory Reform (Fire Safety) Order 2005/Petroleum (Consolidation) Act 1928,</p>	Noted. This will be included as an informative on an approval.

	the local authority or the Health and Safety Executive.	
Lewisham Council	No response received	Noted.

6.4 Council Departments

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

Details of Representation and date received	Summary of Comments	Officers comments
Building Control	No response received.	Noted.
Conservation Officer	<ul style="list-style-type: none"> - The proposed replacement material - aluminium cladding – is appropriate to 21st century buildings and metal cladding has been used elsewhere within the development, so the proposed replacement cladding will not be incongruous; - Whilst the matt bronze colour will sit comfortably in the surrounding context, the proposed single-colour material will lack the variety of colour tones which the timber elements have 	Noted.

	<p>achieved through natural weathering and will result in a more flat appearance. This will be most pronounced on the large areas of cladding rather than on balustrades and louvres. Consideration could be given to using two or three shades of colour across the blocks to enliven the elevations;</p> <ul style="list-style-type: none"> - Whilst the appearance of the buildings will change due to the replacement components, the impact of the proposed changes on the setting of the nearby listed buildings and the character and appearance of the conservation area will be negligible and, therefore, approval of the application is supported. 	
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6.5 Amenity Groups

6.5.1 A summary of the consultation responses received from Amenity Groups, along with the officer comments are set out in table below:

Details of Representation	Summary of Comments	Officers comments
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and date received		
Greenwich Society	No comment.	Noted.

6.6 Local Residents and Businesses

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

Summary of Comments	Officers comments
<ul style="list-style-type: none"> <i>Funding of proposed works:</i> <ul style="list-style-type: none"> - unclear who will fund the proposed works - occupiers have not been consulted on funding the proposed works - leaseholders should not be left with these costs 	Noted. This is a private matter for residents and the developer to resolve. Matters relating to funding are beyond the scope of the current planning application which seeks to improve the fire safety of the building.
<ul style="list-style-type: none"> <i>Reefmark failed to consult with leaseholder regarding different contractors to be used</i> 	Noted. This is a private matter for residents and the developer to resolve. Matters relating to contractors to undertake the works are beyond the scope of the current planning application which seeks to improve the fire safety of the building
<ul style="list-style-type: none"> <i>Issues with loss of heating with development for a year</i> 	Noted. This is not a material planning consideration for this application.
<ul style="list-style-type: none"> <i>Balconies are unusable, and existing gaps should be filled with concrete rather than replacement.</i> 	The location of the balconies has already been approved in the initial consent. With regards to filling in the gaps, this is not an option suggested within the submitted Fire Statement.
<ul style="list-style-type: none"> <i>New aluminium boards on balconies may obstruct light</i> 	The replacement of timber with aluminium for the balconies is not considered to materially affect the access of light into properties.
<ul style="list-style-type: none"> <i>Loss of privacy during building process</i> 	It is expected that there will be scaffolding and contractors outside of the blocks during the construction

	period. How this will be managed is between the free holders and leaseholders.
<ul style="list-style-type: none"> • <i>Safety of residents if builders need to access inside flat</i> 	If the contractors require access to Flats to undertake the work, this would have to be agreed between holders and leaseholders and is outside of the scope of this application which seeks to improve fire safety.
<ul style="list-style-type: none"> • <i>Application form doesn't indicate site is within flood risk area.</i> 	The site is location within Flood Zone 3 benefiting from flood defences. Although not correctly noted on the application form, this is not considered to be a reasonable reason to delay or refuse the application as there are no flood risk considerations for the proposed works.
<ul style="list-style-type: none"> • <i>Was not notified about planning application.</i> 	The application was notified in accordance with the statutory requirements. Additionally, each flat subject to the proposed remedial works was directly notified by post.
<ul style="list-style-type: none"> • <i>Noise, dust and work which may cause concern for occupiers of apartments</i> 	It is expected that there would be some noise, dust and work which may cause temporary inconvenience for occupiers of the apartments. The impacts of these works upon occupiers of the flat is considered to be a management issue between the freeholder and the leaseholders/tenants.
<ul style="list-style-type: none"> • <i>Works being undertaken during lockdown and/or summer months is not supported as people are stuck within flats and may not be able to open windows or have good outlook.</i> 	Noted. These works would be temporary and are for safety reasons, therefore the temporary inconvenience is outweighed by safety concerns if the works were not completed.
<ul style="list-style-type: none"> • <i>Torrent Lodge is below 6 storeys and may not require remedial work</i> 	Noted.

<ul style="list-style-type: none"> • <i>What material needs to be replaced?</i> 	<p>The submitted plans, the major works notice and Fire Statement details the proposed works which includes replacing identified combustible materials on the facades of Blocks B, C and F.</p>
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7. Planning Context

7.1 This application needs to be considered in the context of a range of national, regional and local planning policies and Supplementary Planning Guidance / Documents.

- **National Planning Policy Framework (NPPF – 2012)**
- **Planning (Listed Buildings and Conservation Areas) Act 1990**
- **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.
- Full details of relevant SPD / Documents refer to appendix 3.

8. Material Planning Considerations

8.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application (Ref: 20/3873/F):

- Principle of development;
- Design and Heritage;
- Fire Safety;
- Residential Amenity;
- Noise and Air Quality;
- Transport and Access;
- Community Infrastructure Levy (CIL) & RBG CIL; and
- Implications for Disadvantaged Groups.

9. Principle of Development

- 9.1 Policy D12 of the Draft London Plan outlines that, in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.
- 9.2 The current application seeks to improve fire safety standards within the host building, through the improvement of the existing building fabric. This would be in line with the above policy, which among other things, seeks to ensure developments are constructed in an appropriate way to minimise the risk of fire spread and incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire.
- 9.3 On this basis, no objections are raised with regard to the principle of the proposed development.

10. Design and Heritage

- 10.1 Section 72 of the Listed Buildings and Conservation Areas Act 1990 states that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.”
- 10.2 Chapter 16 of the NPPF also makes it clear that when considering planning applications, local authorities should give great weight to a heritage assets conservation. Where a development proposal leads to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.3 Chapter 12 (Achieving well-designed places) of the NPPF states “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
- 10.4 Policies DH3, DH(h) and DH(i) of the Core Strategy set out that development should preserve or enhance the character and appearance of Greenwich’s Conservation Areas and other heritage assets. This is supported by Policy HCI of the London Plan.
- 10.5 Policy D4 of London Plan discusses how schemes should deliver good design and requires design to be thoroughly scrutinised.

- 10.6 Policy DH1 of the Core Strategy requires that all developments be of a high-quality design and demonstrate that they positively contribute to the built and natural environment. The policy goes on to list the expectations of new development in achieving this policy aim.
- 10.7 The proposal seeks consent for the removal of the existing cedar plank cladding and the installation of aluminium cladding which includes a new rail system and Polyisocyanurate Insulation. The aluminium cladding would have a bronze Tijuka Sable Matt finish. The location of the replacement cladding is shown on the proposed elevations and is limited to Blocks B, C & F. The proposal maintains the design and character of the existing consent, simply seeking to update the cladding to be consistent with current Government Guidance.
- 10.8 The Council's Conservation Officer was consulted and did not object to the application.
- 10.9 Furthermore, the proposed changes respect and conform to that which is existing, therefore maintaining the character and appearance of the buildings, surrounding area, and nearby and Grade II Listed Buildings and the nearby conservation area. As such, the proposal is acceptable in design and heritage terms.
- 10.10 Overall, the proposal is consistent with Section 72 of the Listed Buildings and Conservation Areas Act 1990, Chapters 12 and 16 of the NPFF (2019), Policies D4, and HCI of the London Plan, and Policy D3, DH1, DH(h) and DH(i) of the Royal Greenwich Local Plan Core Strategy (2014).

11. **Fire Safety**

- 11.1 London Plan (2021) policy D12 sets out that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. The policy requires all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The policy goes on to set out six criteria that must be identified within the strategy.
- 11.2 In January 2020 the Ministry of Housing, Communities & Local Government (MHGLC) published the 'Advice for Building Owners of Multi-storey, Multi-

occupied Residential Buildings' which consolidated previous guidance notes in relation to the measures Building Owners should take to review External Wall Insulation systems and Spandrel Panels to their residential blocks and to assess the surety of their fire safety, and the potential risks to residents of external fire spread. The applicant had undertaken a review of the external cladding and other elements do not meet the appropriate standard for fire safety and require replacement.

- 11.3 A Fire Statement has been submitted in support of the application and has been prepared by Dr Raymond Connolly (qualifications: BE, PhD, CEng, MIFireE, MSFPE). This statement details the proposed works required to achieve an EWSI form which provides conformation that a building has no attachments whose construction includes significant quantities of combustible material. An EWSI form is generally required by banks and mortgage lenders. The works outlined within the Fire Statement are the works proposed within this application. The fire safety statement will be secured by condition in line with the GLA London Plan Guidance Sheet for Policy D12(A) - Pre-consultation draft March 2021.
- 11.4 The remedial works have a clear link to ensuring the safety of persons who occupy the site and those that surround it. This was consulted with the London Fire Brigade who did not raise any concerns, as set out in the consultation section above.
- 11.5 The proposal is consistent with Policy D12 of the London Plan

12. Residential Amenity

- 12.1 Core Strategy Policy DH(b) states that developments will only be permitted where it can be demonstrated that the proposal 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 un-neighbourly sense of enclosure or loss of outlook.
- 12.2 The application does not alter the bulk and massing of the existing consent as the proposed replacement works would be similarly located and sized and performs the same function. As such the proposal does not alter the assessments of daylight/sunlight or overbearing impacts that were undertaken when considering the application for the buildings. The proposal does not

introduce any new windows meaning there is no loss of privacy resulting from the proposal.

12.3 As the proposal is essentially a like-for-like replacement of cladding in terms of locations and dimensions, there will be no reduction in the level of residential amenity experienced at surrounding sites. The proposal is consistent with Policy DH(b) of the Royal Greenwich Local Plan Core Strategy (2014).

13. Noise and Air Quality

13.1 Policy D13 of the London Plan states that boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed. This is also supported by Policy D14 of the London Plan.

13.2 Policy E(a) of the Core Strategy states that planning permission will not normally be granted where a proposed development or change of use would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit. This is also reflected through Policy D13 of the London Plan 2021

13.3 No construction mitigation strategies were identified within the submission. Considering the location of the blocks subject to the works, it is considered that there wouldn't be significant disruption or noise impacts to any residential property outside of the site. In terms of impacts to properties within the site, it is anticipated that there will be some temporary disruptions and noise from the proposed construction works. It is up to the contractor in discussions with the freeholder and leaseholders to best manage these temporary impacts. These temporary disruptions and impacts are expected and acceptable for such a scheme and when considering the safety improvements the scheme would bring to the site. An informative is proposed to remind the applicant of general construction noise requirements and working hours.

13.4 As such, the proposal is consistent with Policy E(a) of the Royal Greenwich Local Plan Core Strategy (2014).

14. Transport and Access

14.1 Policy T4 of the London Plan outlines that developments should not increase road danger.

14.2 The development itself would have no material impacts on the surrounding highway network, as the external appearance of the building would remain unchanged. Further, the proposed works are not considered to be of a scale that would warrant the imposition a construction traffic logistics plans.

14.3 Therefore, it is considered that the proposal would have an acceptable impact, and therefore comply with Policy T4 of London Plan.

15. Community Infrastructure Levy (CIL) & RBG CIL

15.1 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies DFI. The Mayoral CIL formally came into effect on 1st April, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £35 per square metre.

15.2 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.

15.3 The current application is not applicable to either requirements.

16. Implications for Disadvantaged Groups

16.1 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:

- No implications for disadvantaged groups have been identified.

17. Conclusion

- 17.1 The proposed replacement cladding would have no impact on the design and appearance of the host buildings and surrounding heritage assets. This proposal would see the safety of the occupiers improved and brought up to required standards.
- 17.2 The temporary disruptions in respect to neighbouring amenity and highways from the proposed construction works are considered acceptable considering the safety improvements the scheme works would bring to the site.
- 17.3 Accordingly, it is recommended that permission be approved for application reference 20/3873/F, in line with Section I of this report.

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