

Planning Board	Agenda Item: 5
16 November 2021	Reference Nos: 21/2040/F

Applicant: Fairview Estates (Housing) Ltd

Site Address: Gallions View Nursing Home, 20 Pier Way, Thamesmead, SE28	Ward: Glyndon Application Type: Full Planning Permission
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I.0 Recommendation

I.1 The Planning Board is requested to grant:

Full planning permission for the demolition of existing care home to facilitate the comprehensive redevelopment of the site to provide 333 residential dwellings (Use Class C3) in buildings ranging from 2-12 storeys, together with the provision of ancillary parking, open spaces and other associated works;

Subject to:

- i. Referral of the application to the Mayor of London as required under the terms of The Town and Country Planning (Mayor of London) Order 2008;
- ii. The Conditions (Appendix 2) to be detailed in the notice of determination; and
- iii. the prior completion of an agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) containing the planning obligations as summarised in the heads of terms set out in this report (Section 28), any addendums and the minutes of this planning board meeting;

I.2 To authorise the Assistant Director of Planning & Building Control to:

- i. make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2), any 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; and
- ii. finalise the detailed terms of the planning obligations pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), as set out in this report (Section 28), any addendums and the minutes of this Planning Board meeting.

- 1.3 In the event that the Section 106 Agreement is not completed within three (3) months of the date of this Planning Board meeting, to authorise the Assistant Director of Planning & Building Control to consider whether permission should be refused on the grounds that the proposals are unacceptable in the absence of the benefits which would have been secured, and if so, to determine the application with reasons for refusal which will include the following;

In the absence of a legal agreement to secure financial and non-financial contributions towards Affordable Housing, Transport, Highways works, Employment and Training, and Environmental Sustainability, Health Care, and Open Space, the development is contrary to Policy H6, D7, SI 2, SI 4, SI 5 of the London Plan (2021) and H3 and H5, CHI, EI, IM1, IM4 and IM(c) 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. Executive Summary

- 2.1 Detailed below is a summary of the application:

The Site	
Site Area (m ²)	1.98Ha
Local Plan Allocation	Strategic Development Location - Thamesmead
Heritage Assets	No heritage assets on the site
Tree Preservation Order	No
Flood Risk Zone	Flood Zone 3 (Area benefiting from flood defences)

Proposed Building	
Building height (metres)	8.19m to 41.80m
No. of storeys	3 - 12 storeys
Floor area (m ²)	30,792m ² (GIA)

Housing		
Density	Units per Hectare (u/ha)	168 u/ha
	Habitable Rooms per Hectare (hr/ha)	500 HR/HA
Dwelling Mix	Studio (no. / %)	13 / 4%
	1-bed (no. / %)	88 / 26%
	2-bed (no. / %)	168 / 50%
	3-bed (no. / %)	64 / 19%

Affordable Housing / Tenure Split	Overall Affordable Housing (no. / %)	117 / 35%
	Social Rent (no. / %)	115 / 35%
	Intermediate Rent	0 / 0%
	Private (no. / %)	216 / 65%
	Commuted Sum	n/a
Housing Standards	Complies with Technical Housing Standards – Nationally Described Space Standard and London Plan standards?	Yes

Transportation		
Car Parking	No. existing car parking spaces	45
	No. Proposed Car Parking Spaces	129
	Proposed Parking Ratio	0.39
	Car Club Spaces	2
Cycle Parking	No. Proposed Cycle Parking	615
Public Transport	PTAL Rating	1b-2

Sustainability / Energy	
Reduction of CO ₂ Emissions beyond Part LIA 2013	62%

Public Consultation	
Number in support	0
Number of objections	14
Main issues raised	<ul style="list-style-type: none"> • Excessive height • Impact on local amenities • Loss of green space • Impact on parking • Loss of existing care home • Loss of light • Increased crime • Impacts during construction

- 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 satisfactory completion of a S106 legal agreement and conditions set out in the report.

3. The Site

3.1 The location of the application site is shown on the following plan:



Figure 1: Gallions View Site Plan

4. Description of Site and Surrounding Area

4.1 The application site is approximately 1.98ha and is located on the eastern side of Pier Way, Thamesmead. The site was previously used as a care home (Class C2) and contains 6 single storey buildings with associated car parking and open space. The care home use ceased in 2019 and the site is currently vacant. The site is accessed via a gated access road leading off from Pier Way.

- 4.2 The surrounding area is primarily residential in nature, comprising a mixture of property types including terraced, semi-detached and detached dwellings, as well as several flatted developments. To the west of the site building heights are largely contained to two storeys, while to the east and south this rises to three and five storeys respectively.
- 4.3 The eastern boundary of the site is separated from the neighbouring residential development by a disused waterway, which separates the two areas by some 32m. The waterway has lost its water retaining properties and now comprises little more than low level stagnant water and algae for the majority of the year. Along either side of the waterway are public footpaths, although the western path leads to a dead-end and is mostly inaccessible due to vastly overgrown vegetation. The eastern path leads to Gallion's Park and the Thames Path.
- 4.4 To the north of the site is a large area of open land. Both the waterway and part of the open land are designated as Community Open Space in the Royal Greenwich Local Plan.
- 4.5 The site is not located within, and is not adjacent to, a Conservation Area, nor is it subject to any relevant Article (4) Directions. It is not in the immediate vicinity of any statutory or locally listed buildings or structures, although it is noted that the lock and swing bridge to the northern end of the waterway is Grade II Listed.
- 4.6 The Public Transport Accessibility Level (PTAL) for the site is rated at 1b-2. This is on a scale of 0-6b, with 6b being the most accessible. It is also within Flood Zone 3, within an area benefitting from flood defences.

5. Relevant Planning History

Application Site

- 5.1 None.

Land at Broadwater Dock/ Gallions Park West/ Camelot Close Thamesmead SE28 (Adjoining Site to the North)

- 5.2 **02/0806/F** - Development of site to provide 70 flats (11 x 1 bed, 57 x 2 bed 2 x 3 bed) in two blocks ranging in height between 2-6 storeys, with associated parking and access, infilling of part of dock to create amenity open space, renovation and improvement of remaining dock, redesign of proposed park, and landscaping. **Approved, 27/04/2006.**

5.3 **11/0871/RT** - Renewal of extant planning permission dated 27.4.06 Ref:02/0806/F for the development of site to provide 70 flats. **Approved**, 30/03/2012.

6. Proposal

- 6.1 The application proposes the demolition of all the existing care home buildings and the construction of a residential development comprising 333 residential dwellings. The residential units would be provided within four residential blocks (Blocks A-D) with heights ranging from 3 to 12 storey, and 10x 2 storey single family dwellinghouses.
- 6.2 The two larger residential blocks located to the southern end of the site would be delivered as podium buildings, with undercroft parking spaces below. The two remaining smaller blocks would be sited along the north-eastern boundary of the site and would be of a more traditional linear design with no podiums.
- 6.3 Block A located in the southern corner of the site is the slightly larger of the two podium buildings in terms of footprint. The building would have direct frontage onto Pier Way. Block A would have heights ranging from three to eight storeys, with the reduced heights focused to the northern side of the building, closest to the two storey neighbouring properties on Camelot Close. The heights would then step up towards the maximum eight storeys on the south-eastern corner.
- 6.4 Block B would be located to the north-east of Block A, at what the applicant has termed the “elbow” of the site. As with the other podium block, Block B would see the height of the building limited to three storeys at the northern elevation, closest to the existing two storey dwellings on Camelot Close, with the building height stepping up towards the eastern and south-eastern site boundaries. This increase in height would culminate in an 12 storey tower element to the southern corner of the building, while the remainder of the building would be limited to a maximum height of six storeys.
- 6.5 The remaining two flatted blocks would be located along the north-east boundary of the site, to the north of Block B. These would be more traditionally designed flatted blocks arranged around single cores and would be five storeys in height, with the top floor set back on the western elevation.
- 6.6 Opposite the two smaller flatted blocks would be 10x two storey three-bedroom single family dwellinghouses.

6.7 The proposal would deliver 335 residential units, which would be distributed in the following mix:

Unit Type	Quantum	%
1 Bed Units	112	34%
2 Bed Units	165	49%
3 Bed Units	58	17%
Total	335	100%

6.8 Thirty-four (34) of the three hundred and thirty-three (333) proposed units would be M4(3) wheelchair user dwellings, which would amount to 10.1% of total provision.

6.9 One hundred and seventeen (117) of the units would be delivered as a affordable housing, with 100% of these provided as social rented dwellings.

Landscaping

6.10 Between the proposed residential blocks would be modest areas of open space, which would be landscaped. These areas would all be publicly accessible. The two larger blocks to the south would both feature communal courtyards at first floor level, accessible to the residents of the respective blocks.

6.11 All residential units will have access private amenity space in the form of either a private garden/terraces at ground floor level or a balcony at upper levels.

Car and Cycle Parking

6.12 The site would maintain the existing private access road adjoining Pier Way, which would form the sole vehicle entry and exit point. New pedestrian access paths would be formed to the southern end of the site, as would an internal cycle route.

6.13 As well as the internal ground floor parking contained within the two large podium blocks, a number of additional on-street parking spaces would also be provided within the site. In total, the residential parking would amount to 0.39% at 129 spaces total.

7. Consultation

- 7.1 The application has been the subject of public consultation, comprising of 6 site notices, and 441 individual letters, sent to individual occupiers in the vicinity of the application site. A press notice was also issued.
- 7.2 In addition to the above consultation with statutory bodies and local amenity groups was undertaken.
- 7.3 The application was subject to a re-consultation in October 2021 due to following amendments:
- Reduction of tower element from 13 storeys to 12 and updated detailing
 - Amendments to proposed balcony detailing
 - Increase in height to sections of five storey elements within Blocks A and B to 6 storeys
 - Landscaping updates to street materials and provision of continuous pedestrian path
 - Incorporation of a cycle lane within the site
 - Provision of public artwork within the site's eastern boundary
 - Addition of triangular oriel windows to proposed dwellinghouses to improve privacy/outlook
 - Updated cycle parking details

7.4 Statutory Consultees

- 7.5 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
Transport for London (TfL)	Initial Comments: Further detail should be provided on how the development connects with, and where appropriate enhances, the surrounding cycle network in line with Policy T4.	Applicant has provided details of an internal cycle way within the site. Final details of this and how it would interact with the Pier Way cycle lane to be secured by condition. Improvements to Pier Way cycle lane also to be

	<p>Consideration should also be given to enhancing walking and cycling links to local bus stops and rail stations in line with the Mayor's Healthy Streets Approach as set out in London Plan Policy T2.</p> <p>As currently presented, both the main access and the road through the development prioritises the movement of vehicles instead of walking and cycling contrary to the Mayor's Healthy Streets approach. A car dominated unpleasant and unsafe environment for pedestrians and cyclists would thus result. These issues should be addressed, including through removing surface car parking.</p> <p>The site borders Broadwater Dock, however the proposed development does not fully integrate and utilise this water feature. The applicant should explore widening the footpath along the dock to accommodate demand including cyclists wanting to access the Thames Path and enhance the route.</p>	<p>secured through a financial contribution.</p> <p>The proposal includes upgrades to the footpath along the Pier Way site boundary. This will be secured in the S106 legal agreement.</p> <p>The proposal would use a variety of surface materials, road calming measures and multiple access points for pedestrians and cyclists, prioritising these users within the site. The development has also been arranged so as to minimise on-street parking, with only 25 on-street parking spaces provided across the 2ha site. In total, the residential parking would be provided at a ratio of 0.39 spaces per unit.</p> <p>This was explored by the applicant as part of pre-application discussions. However, due to substantial land level changes, creating a level surface across the two sites would be costly and would impact factors such as the overall affordable housing provision.</p>
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	<p>The applicant anticipates that residents will utilise Plumstead Station for National Rail services. However, the walking and cycling environment from this site to the station is poor and could deter the use of this mode. A contribution to improve the walking and cycling environment and make the station easily accessible, particularly noting the high-speed traffic at Pettman Crescent and the A206, should be secured in line with Policy T4.</p> <p>The site is within an inner London Opportunity Area and should therefore be car-free in line with Policy T6.1. Furthermore, it is also one of the first developments to come forward within the OA since the adoption of the Thamesmead and Abbey Wood OAPF in December 2020. As such, in line with the objectives of the jointly agreed OAPF, a car-free scheme is required. The requirement for a car-free development at this site has been highlighted to the applicant throughout the pre-application stage.</p>	<p>Improvements to Pier Way cycle lane will be secured in the S106 legal agreement, which links up to the Thames Path and rail services in Woolwich, including the upcoming Crossrail station.</p> <p>Whilst it is recognised that the site is located within the Thamesmead and Abbey Wood OAPF, the site is near to the western periphery of this area and given the accessibility level, the site is not considered appropriate for car free development. Parking has been minimised on the site, despite its poor PTAL rating. A contribution is also being sought towards consultation for a controlled parking zone (CPZ) in the immediate area, which if implemented would facilitate the delivery of other developments within the Thamesmead Opportunity Area as car</p>
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	<p>Furthermore, the applicant's own car parking survey indicates that within the surrounding streets there are 244 potential parking spaces, of which at least 76 were unrestricted, within the survey catchment of the site. These spaces have an observed utilisation of 45 per cent. In the absence of adequate controls TfL have a strong concern that the proposed development through occupiers and visitors use of these spaces will increase car-dominance in the surrounding streets which is contrary to Policy T2 of the London Plan.</p> <p>Of the 129 car parking spaces proposed, four are for disabled people which is equivalent to 1.2 per cent of dwellings. Policy T6.1 requires that three per cent of dwellings are provided with access to a disabled bay.</p> <p>A Parking Design and Management Plan (PDMP) should be required by condition detailing how further disabled persons' parking can be provided should demand arise, or</p>	<p>free. Moreover, future occupiers of this development would not be eligible for parking permits on RBG roads.</p> <p>The Council is unable to unilaterally impose parking restrictions on roads within the borough, but instead must consult residents. These comments from TfL therefore demonstrate why a level of on-site parking is required. As mentioned above, if approved the developer will contribute to a consultation for the introduction of a CPZ. If this is implemented, residents of the development will not be eligible for RBG permits.</p> <p>The developer has increased blue badge parking provision on site. This now conforms to London Plan Policy.</p> <p>This will be secured via condition.</p>
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	<p>alternative arrangements and that parking will be allocated on the basis of need and not tied to particular homes.</p> <p>Active electric vehicle charging points (EVCP) are to be provided for 40% of car parking spaces with the remainder having passive provision. This is in line with Policy T6. However, it is encouraged that all disabled persons' parking spaces have active provision from the outset.</p> <p>615 long-stay cycle parking spaces and nine short stay cycle spaces are proposed for the residential units, which is in line with the minimum standards set out in Policy T5 of the London Plan.</p> <p>All cycle parking should be designed in line with London Cycle Design Standards (LCDS), as also required by policy T5. From reviewing the submitted plans there are some areas of non-compliance.</p> <p>The site is in close proximity to a pair of bus stops served by two routes – 380 and 244 – both of which are currently operating at full capacity. Noting the demand that the proposed development will</p>	<p>While this is not a policy requirement and informative will be added to advise the applicant.</p> <p>Noted.</p> <p>Noted - final details to be secured via condition.</p> <p>This has been agreed by the applicant and will be secured in the S106 legal agreement.</p>
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	<p>place on the bus network a contribution of £270,000 is sought in line with Policy T4 of the London Plan.</p> <p>A full delivery and servicing plan (DSP) should be secured by condition in line with policy T7 of the London Plan.</p> <p>A full construction logistics plan (CLP) should be secured by condition in line with policy T7 of the London Plan.</p> <p>A Travel Plan (TP) should also be secured by condition.</p> <p>Comments on revised details: Whilst it is noted that the applicant has taken into account connections to the north, it is still disappointing to see that no attempt to create a connection to Camelot Close. Instead, a tree has been proposed to be planted at would be the connection-point and there is no footway on this side of the street. This is a missed opportunity that the applicant should address or justify this omission.</p> <p>Main street through the site is car-dominated/no-sense of pedestrian and cycle</p>	<p>Relevant condition will be attached.</p> <p>Relevant condition will be attached.</p> <p>Travel Plan to be secured via S106 legal agreement.</p> <p>The proposed connection to Camelot Close proposed by TfL is not feasible as it relates to private land owned by four dwellings on the adjacent site. RBG Highways have also been consulted on this at pre-application stage and raised concerns at this proposal. Connecting the two sites, even if just via pedestrian access, would likely see residents of the development parking in Camelot Close, which would not be a desirable outcome.</p> <p>As set out above, a number of measures have been incorporated though</p>
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	<p>prior/impact of surface car parking in this space.</p> <p>Landscape and public realm changes 1-3 are welcome, helping to break up the visual dominance of the carriageway, albeit these would be further improved if the high quantum of parking was reduced. Similarly, use of permeable surfacing will assist in reducing run off and flooding that would otherwise arise from the extensive hard surfacing. Opportunities for low-level planting should also be maximised to mitigate the adverse impacts of the parking and carriageway areas</p> <p>The inclusion of ‘continuous footways’ is likely to be an appropriate response to a low-traffic, low-speed environment where pedestrians are prioritised. Continuous footways usually omit tactile paving to aid visually impaired pedestrians, and thus should be subject to an Equalities Impact Assessment. If acceptable it will be essential that measures are included to ensure priority for pedestrians and low traffic speed.</p> <p>The parking area in the centre of the site, and the</p>	<p>the site to prioritise pedestrians and cyclists.</p> <p>Landscaping details will be secured via condition.</p> <p>Traffic calming measures will be secured via condition to ensure low-speed environment. As part of the landscaping condition details the applicant has been advised to include an Equalities Impact Assessment to demonstrate that the proposed arrangements would be accessible to all.</p> <p>It is unclear what benefits would be achieved</p>
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	<p>lack of a footway on the northern side of the new street seems to undermine the intention to prioritise pedestrian movement. We would recommend further widening and realignment of the informal pedestrian crossing to better reflect likely desire lines, especially if a footway can't be provided on the north side of the new street. It has not been demonstrated why a footway cannot be provided on the north side of the new street.</p> <p>Need for a stronger connection to the Pier Walk cycle route and bus stop.</p> <p>A 4m-wide route for walking and cycling into the heart of the site is welcomed in principle. However, the details of the proposals need further consideration. The connection with the cycle track on the western side of Pier Way is not shown – there is no crossing-point at this location – and there is</p>	<p>through the provision of a footpath along the northern boundary, subject to the proposed continuous footway being accessible. The provision of landscaped areas along the boundary improves ecological opportunities, whilst simultaneously providing a green buffer to properties on Camelot Close. Provision of a second footpath would result in a narrower access road, which would increase potential vehicle conflicts and conflicts with cyclists. There are also no dwelling proposed on this section of the site.</p> <p>A condition requiring greater details for the proposed cycle lane interface with the footway on Pier Way and the existing cycle lane is proposed. This will be expanded to include the bus stops.</p> <p>Final details of the cycle lane will be secured via condition. However, given the limited width available at the northern end of the site it is unlikely that it could be extended here without having implications on the landscaping, footpath or carriageway.</p>
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	<p>no exploration of whether the existing cycle track adequately meets the aspirations for active travel for this site and the wider Opportunity Area. Indeed, applying LCDS and the Cycle Route Quality Criteria, it would appear that it does not meet the required standards. Furthermore, no consideration has been given to crossing from the cycle track to the main vehicular entrance to the site, which many residents may choose to use. Further work on this matter is required.</p> <p>Regarding the 4m-wide path itself, attempting to divide the space between pedestrians and cycles merely results in inadequate space for cyclists and/or pedestrians. Given the likely pedestrian and cyclist numbers, a shared use approach may be preferable. Should the northern connection through the site be opened up in future, then widening and/or dividing the path could be reconsidered at a later date.</p> <p>TfL is again disappointed to see no consideration given to addressing the barrier presented by the roundabout at the threshold to the site, meaning that</p>	<p>As outlined above, details will be secured via condition and may be subject to change should a more appropriate arrangement be agreed between the applicant, RBG Highways and TfL.</p> <p>RBG Highways have objected to the alteration of the existing roundabout.</p>
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	<p>people walking to and from the nearest bus stop and to key local facilities, including schools, must make an uncontrolled crossing of at least one arm of a roundabout. This will neither assist in achieving vision zero objectives nor does it deliver pedestrian priority. Roundabouts also cause issues for cyclists.</p> <p>Need for contributions towards improving walking/cycling beyond the site boundary, capturing the potential for active travel trips to/from Plumstead. This needs further exploration in order to maximise the potential for trips by active travel modes, noting the comments made above about the roundabout as a barrier to pedestrian and cycle movement.</p> <p>As highlighted in TfL's detailed comments, further changes to the design of cycle parking were needed. You have stated that these amendments have been made, but in the absence of scaled drawings these cannot be confirmed.</p> <p>Based on the plans provided, it is noted that the applicant is providing access to cycle parking stores from the public</p>	<p>Improvements to the cycle path along Pier Way have been secured, as have public realm improvements in the form of the publicly accessible pocket park and relaying of footpath on Pier Way along site boundary.</p> <p>Final details of cycle parking to be secured via condition.</p> <p>It seems that the majority of stores could be adapted/rearranged to provide access from a core. However, this</p>
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	<p>realm. As highlighted in pre-application discussions, access to cycle parking should be through lobbies or other similar spaces in order that sufficient natural surveillance is provided to avoid creating situations which compromise users' personal security.</p> <p>The layout of the some of the cycle parking stores needs further thought. One of the cycle stores located in Block D shows the current positioning of the two-tier racks will make those at the end difficult to use.</p> <p>At present, the bus corridor (244/380) serving this site is operating at full capacity and cannot accommodate the additional demand generated by the proposed development. The requested contribution of £270,000 is for an extra return bus journey during the peak period, to mitigate the demand generated by the proposed development. This request is made in line</p>	<p>would make accessing the stores more convoluted as residents would have to navigate multiple doors and corridors. Moreover, there is no policy requirement for access to be provided from a core, nor did the Met's SBD Officer raise objection to the proposed arrangements. Cycle parking details will be expected to demonstrate that efforts have been made to address security concerns, such as installation of CCTV and adequate lighting.</p> <p>Officers are satisfied that the final details can be agreed at condition stage. The applicant has however provided updated plans to address the specific issues raised with Block D.</p> <p>The contribution has been agreed.</p>
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	<p>with Policy T4 of the London Plan and has been reduced to three years from the usual 5 taking account of the shorter period of time it is expected in this case to reach an operational viable demand for the service.</p> <p>An updated assessment for delivery and servicing demand has not been provided. There is a concern that consideration has not been given to the increase in online deliveries which has increased in the recent years. What measures are being implemented to manage this demand?</p> <p>What amendments has the applicant made to the scheme to address TfL's concerns raised about delivery and servicing movement? As highlighted previously, the movement looked tight, and could result in conflict between cyclists, pedestrians and vehicles.</p>	<p>A Delivery and Servicing Plan will be secured via condition. However, from the current plans there are areas within the access roads where delivery vehicles could stand while deliveries are made.</p> <p>RBG Highways Officers have not raised similar concerns and it is considered that these issues can be addressed at the submission of details stage.</p>
GLA	<p>Land use principles: The London Plan states that to meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year. The proposals have not satisfactorily addressed</p>	<p>Discussed in the Principle of Development section of this report.</p>

	<p>'identified need' for care home accommodation within the borough, and how this need will be met in the short, medium and long-term. Further information is required to clarify care home accommodation need within and provision within Greenwich, noting the strategic wide need for increased provision of such facilities. The principle of residential development on the site could be accepted, subject to the resolution of the loss of the care home.</p> <p>Equalities: An equalities impact assessment should be provided.</p> <p>Affordable housing: The scheme proposes 42% affordable housing by habitable room, comprising 100% London Affordable Rent. The scheme may be eligible to follow the Fast Track Route (FTR) subject to confirmation that the offer comprises at least 35% affordable housing without public subsidy; that the tenure split is acceptable to the Council; and that the scheme meets other policy requirements and obligations to the satisfaction of the borough and the Mayor. Affordability levels and an early stage</p>	<p>This has been provided. However, updated information requested as part of landscaping condition.</p> <p>Scheme is eligible for fast-track route. Units to be delivered as London Affordable Rents and early stage review to be included in S106 legal agreement.</p>
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	<p>review mechanism must be secured within a S106 agreement.</p> <p>Urban design: The existing site is a constrained and access through the site should be future-proofed to ensure that any development to the north-east of the site enhances permeability to the wider to the area. The site is not identified within the development plan as suitable for tall buildings and does not comply with Policy D9(B). Subject to addressing the criteria in Policy D9(C), the proposed tall buildings could be acceptable on balance.</p> <p>Energy: Further information is required in relation to a number of elements of the proposed energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.</p> <p>Flood risk: A review of flood risk (including residual risks) from all flooding sources should be provided. Flood resilience and emergency planning measures should be proposed.</p> <p>Sustainable drainage: Further information in</p>	<p>Developer has provided indicative drawings showing potential connections to site to the north. Considerations relating to height set out in Design, Townscape, Public Realm and Heritage section of this report.</p> <p>Additional information has been provided by the applicant. RBG's Sustainability Officer has raised no objections, subject to conditions.</p> <p>A flood risk assessment has been provided. This has been reviewed by the Council's flooding/drainage specialist and no objections were raised subject to condition. This is discussed further in the Flood Risk and Surface</p>
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	<p>relation to the inclusion of SuDS and associated maintenance plan is required.</p> <p>Urban Greening: A drawing showing the extent of each surface cover type is required to confirm the UGF score calculation.</p> <p>Air quality: Further information is required to determine compliance with London Plan air quality policies. Construction phase conditions should be page 26 imposed requiring that on-site plant and machinery complies with the London NRMM Low Emission Zone standards and that mitigation measures for a medium-risk construction are written into an AQDMP.</p> <p>Transport: A car-free scheme is required to comply with Policy T6 and the OAPF. Further consideration should be given to prioritising the movement of pedestrians and cyclists within and to/from the site. A contribution towards public transport enhancements should be secured, as well as conditions to mitigate impacts during construction and operation.</p>	<p>Water section of this report.</p> <p>This has been provided.</p> <p>Further air quality information to be secured via condition.</p> <p>Discussed above in response to TfL's comments and in the Transport and Highways section of this report.</p>
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Greater London Archaeological Advisory Service (GLAAS)	No objection, subject to conditions.	Noted – Relevant conditions set out in Appendix 2.
Metropolitan Police (Design Out Crime Officer)	Because the development is suitable to achieve Secured by Design accreditation, I would seek to have a ‘Secured by Design’ condition attached to any permission that may be granted in connection with this application.	Noted – Secure by Design condition set out in Appendix 2.
Thames Water	<p>Waste Comments: Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Water Comments: Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to</p>	<p>Noted.</p> <p>Noted.</p> <p>Condition included within Appendix 2.</p>

	<p>accommodate the needs of this development proposal. A condition is therefore proposed to facilitate water network upgrades.</p> <p>The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. A condition is sought to enforce this.</p> <p>The proposed development is located within 15m of a strategic water main. Condition regarding piling is requested.</p> <p>The proposed development is located within 15m of our underground water assets and as such we would request an informative attached to any approval granted.</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If the applicant is planning significant works near our mains (within 3m) we'll need to check that the development doesn't reduce capacity, limit repair or maintenance activities during and after</p>	<p>Condition included within Appendix 2.</p> <p>Condition included within Appendix 2.</p> <p>Informative included within Appendix 2.</p> <p>Noted. Relevant informative set out in Appendix 2.</p>
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	construction, or inhibit the services we provide in any other way.	
Environment Agency	The Environment Agency has no objection to the proposed development as submitted, subject to the inclusion of conditions on any planning permission granted.	Noted – relevant conditions set out in Appendix 2 of this report.
London fire Brigade	The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.	Noted.
NHS London Healthy Urban Development Unit (HUDU)	Health infrastructure in Greenwich is extremely stretched with little or no capacity for the projected increased population from this and other developments. The Primary Care Networks (PCNs), set up in 2019 are in the process of reviewing their estate requirements in light of additional clinical roles, new ways of working, the significant pressures caused by Covid-19. This work will be incorporated within a wider NHS estate strategy for Greenwich and South East London in line with the NHS 2019 Long Term Plan and local priorities.	Noted. Contribution has been agreed by the applicant and will be secured via the S106 Legal Agreement.

	<p>The three existing health facilities in closest proximity to the site all form part of the Riverview PCN. The intention will be to expand capacity within this PCN/the north eastern part of the borough to accommodate the increased health demands from the development. The cost of providing this increased capacity is calculated as £318,000 at today's costs.</p> <p>The practices across the Riverview PCN are operating above the 1800 GP to patient ratio, with this positioning worsening with the GLA population growth forecast in the short/medium and long term.</p> <p>While the applicant has advised that the local GPs are accepting new patients, this is not the appropriate test for a number of reasons, including that services will be stretched with longer waiting times for existing patients before a practice may close its list to new patients, practices are recruiting additional clinicians including physiotherapists and pharmacists which will take up additional space.</p> <p>We ask that should the planning application be</p>	
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	<p>approved this is subject to a clause in the S106 agreement securing a financial contribution of £318,000 to be paid to the South East London Clinical Commissioning Group in sufficient time to allow the additional health capacity to be provided alongside the arrival of the new population.</p>	
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7.6 Internal Consultees

7.7 A summary of the consultation responses received from internal parties, along with the Officer comments are set out in table below:

Details of Representation and date received	Summary of Comments	Officer's comments
Sustainability and Renewal	No objection, subject to conditions/S106 obligations.	Noted. Full sustainability considerations set out in Section 20 of this report.
Waste Services	No objection subject to condition to secure lockable bin stores to units served by 240L bins.	Noted. Condition set out in Appendix 2.
Environmental Protection	<p><u>Noise and Vibration</u> In terms of the noise aspects – the context of the site seems reasonable for this residential development. Also, the details provided in the submitted acoustic report can generally be seen as satisfactory with acceptable noise levels predicted inside the development.</p> <p>The standard noise conditions would need to be applied:</p>	<p>Noted.</p> <p>Relevant conditions set</p>

	<ol style="list-style-type: none"> 1. <i>Sound Attenuation - Environmental / Transport Noise</i> 2. <i>Demolition/Construction Noise Impacts; Major Sites</i> 3. <i>Balcony/outdoor areas noise condition</i> 4. <i>Plant noise condition</i> <p><u>Air Quality</u></p> <p>It is noted that the applicant has submitted an air quality impact assessment report prepared by Syntegra Consulting (report ref: Ref: 20-7187 dated August 2021). The report highlighted the fact that the proposed development has the potential to cause air quality impacts at sensitive locations during the construction and operational phases, as well as expose future occupants to elevated pollution levels. As such, an Air Quality Assessment was carried out to determine baseline conditions and assess potential effects associated with the scheme.</p> <p>The report Table 4-8 has identified the potential dust emission during construction/demolition phase of the development and suggested some mitigation measure for the site. The report (page 37) discussed about the future exposure and mentioned the use of dispersion modelling. The report suggests that based on the assessment results, future occupant exposure to exceedances of the annual mean NO₂ and PM₁₀ objective is unlikely at all floor levels. All results, as per the report (see page 37), are not anticipated to exceed the AQS objective for annual mean NO₂ and PM₁₀.</p>	<p>out in Appendix 2 of this report.</p> <p>Noted.</p>
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	<p>The report has incorporated the air quality neutral assessment. The report suggests that the potential emissions from the development were assessed to determine compliance with the Air Quality Neutral requirements of the London Plan. The results indicated an acceptable level of building and transport emissions from the scheme will be achieved. As such, the proposed development is considered Air Quality Neutral.</p> <p>The report mentioned that the proposed development has the potential to expose future users to elevated pollution levels in the vicinity of the site during operation. However, the report suggests that the pollution mapping provided by the London Atmospheric Emissions Inventory (LAEI) indicates that future users are unlikely to be exposed to pollutant concentrations that exceed air quality objectives and therefore future exposure is predicted to be not significant. However, I note from the report (page 37) that dispersion modelling was carried out to predict the future exposure, but no detail has been provided and how the model was validated is also not clear from the report. This information should go to the appendix of the report.</p> <p>On the basis of the information available to me I recommend the following conditions:</p> <ol style="list-style-type: none"> (1) Construction environment management plan (2) Demolition management plan (3) Dust monitoring condition during demolition/construction/earthwork phase 	<p>Outstanding details are to be secured through condition, as set out in Appendix 2 of this report.</p>
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	<p>(4) NRMM condition (5) Boiler emission condition (6) Further air quality assessment condition to ascertain the future exposure (7) Condition for Kitchen extraction/ventilation (8) Demolition/construction phase air quality mitigation condition (9) EVCP (if such provision exists) (10) Condition for CHP (if any)</p> <p><u>Contamination</u> Given the nature of the site, with its associated historical contamination and significant depth of made ground and intended future use - It is essential to characterise, and risk assess this site in detail.</p> <p>It is noted that the submitted CGL Geoenvironmental Report - Ref: CG/38206A, Feb 2021; has provided an initial characterisation of the site to be developed; however, it is essential that the Environment Agency are also contacted for specific comment on the following before moving forward with any proposals for remediation and to facilitate any further DQRA requirements – this includes:</p> <ul style="list-style-type: none"> • Matters attaining to piling. • Controlled waters (groundwater etc.); • And matters attaining to re-use of materials onsite and off-site disposal of hazardous material – in relation to requirements under environmental permit regulations; and Waste Acceptance Criteria (WAC) testing 	<p>Noted.</p> <p>Relevant conditions set out in Appendix 2 of this report.</p>
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	<p>Albeit it is noted from the CGL Report, - that they are conscious of these requirements.</p> <p>Please note this Department should ALSO be copied in on all pertinent correspondence attaining to the Environment Agency response - in view of the above AND all additional information supplied by CGL in respect of the above.</p> <p>Thames Water are also a relevant stakeholder in this area and should be approached for comment on the points raised - again this Department should be copied in on pertinent responses in view of the above.</p> <p>In addition to the above requirements – matters pertaining to the Preliminary Risk Assessment of UXO hazards must be undertaken in compliance with current guidance for managing UXO risks (e.g.C681) – and contingency and training protocols provided in the RIP. Also - provisions for dealing with potential underground structures (tanks etc) will need to be specified; and contingency measures outlined for dealing with these - and should be incorporated into the above strategy – and provided as an addendum.</p> <p>The ‘standard’ RBG contaminated land conditions should therefore be in place, for the duration of this Development (please see attached); and - a condition for ‘unforeseen contamination’ - to cover any issues arising during works.</p> <p>Regarding removal of asbestos (ACM) on site - this must be undertaken by a licensed operator, as part of the pre -</p>	
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	<p>demolition protocols – and where soil bunds are proposed – details attaining to air quality monitoring should be supplied – particularly given that ACM have been identified as CoC. A verification statement on completion will also be required to declare the site is free of ACM. Similar provisions should also be in place to satisfy the removal of Japanese Knotweed by an accredited operator where encountered on site.</p> <p>For any additional contamination identified on site the remedial strategy, will need to amend the RIP & VIP accordingly – in addition to providing the required details pertaining to capping layers and verification certificates (e.g., waste and imported soils).</p> <p>On completion of enabling and remedial works a validation statement will be required – stating: ‘the site is suitable for its intended use’.</p> <p>CGL can advise the client on these aspects.</p> <p>Commenting on the initial remedial proposals in the CGL document – please note the following:</p> <p>Additional lines of evidence are undertaken to gain a better understanding of the vapour risks and status at the site. This should include additional monitoring and the collection of vapour samples for laboratory analysis.</p> <p>In principle, based on the assurances and accuracies of documents provided -</p>	
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	the initial measures advocated are acceptable.	
Adult Social Care	<p>Adult Social Care have previously engaged with the developer to determine if the application could include the provision of any extra care units. However, this was investigated by the developer, with feedback from local RP's that the site was not suitable to develop extra care on for a number of reasons.</p> <p>As part of the planning process we have been asked to comment on if we have any concerns about the loss of the existing care home on the site based on our local intelligence and demand.</p> <p>ASC do not have any concerns over the loss of the Gallions View care home as a local CQC registered care home for the below reasons:</p> <ul style="list-style-type: none"> • The care home closed officially in 2019 so there is no immediate impact to local care home capacity • Sustained levels of capacity in the market for the last 12 months with some providers closing individual units to reduce costs whilst occupancy is lower. There is potential to work with these providers to increase capacity should the need arise. • Overall reduction in care home placements since covid with a revised market position statement for older people accommodation to ensure the market has the information to respond to the needs of the local population for the short to medium term future. • Home First initiative and priorities to support people to return home as a 	Noted.

	priority will further support the reduction in care home placements as more people are supported to live at home for longer	
Education	Thank you for notifying us of the proposed development at Gallions View Nursing Home. Children's Services has no comment to make on the proposal.	Noted.
Flood Risk Manager	We do not object to this planning application subject to conditions being attached to any consent if this application is approved by the LPA.	Noted.
Housing Occupational Therapist	Areas of non-compliance identified, but no in principle objection to proposal.	Noted. Revised details issued to OT. Final details to be secured via condition.
Conservation Officer	No response received.	Discussion on the proposal's potential impact on nearby heritage assets is set out in the Design, Townscape, Public Realm and Heritage section of this report.
Tree Officer	No comment received at the time of writing the report.	N/A
Sport and Leisure	No comment received at the time of writing the report.	N/A
Public Health	The provision of larger family sized homes is also a priority for the Council which will enable it to meet the needs of families on the Housing Register, many of whom have 3 children or more Although the proposed development is mostly of one and two-bedroom units it	Noted.

	<p>does include a proportion of 3 bed family units, the largest proportion being affordable rented tenure (38%), which provides much needed family accommodation. In addition, all the houses on the site are for the rented tenure.</p> <p>We note that there have been discussions with the Council’s Health and Adult Services regarding the implications of the loss of a care home and various options were explored including the provision of an extra care facility, but this was deemed not to be a viable option.</p> <p>The development will provide landscaped gardens and areas of play between the buildings which will connect through the scheme to a new area of public open space at the entrance to the site and Broadwater Dock. We note that work has been undertaken to ensure that entranceways, pedestrian routes and active frontages are prioritised within the scheme. In terms of amenity space all flats have private balconies and terraces and the houses have private gardens.</p> <p>We are concerned that although the site is close to the Carronade Place bus stop on Broadwater Road which is served by 2 bus routes and is approximately 950m from Plumstead Rail Station the PTAL accessibility score is between 1b (very poor) and 2 (poor). Although a range of improvements to the public realm, pedestrian and cycle access, as well as cycle storage facilities, are planned to encourage more sustainable travel and a travel plan this</p>	<p>Noted.</p> <p>Noted.</p> <p>Issues discussed in the Transport, Access, Servicing and Parking section of this report. Travel Plan which will secure further details of promoting</p>
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	<p>is an issue that could be further addressed.</p> <p>We note that the proposal includes a total of 129 car parking spaces, which accords with the current guidance outlined within RBG’s Local Plan Core Strategy, but the development will not be car free.</p> <p>We note that the developer’s Health Impact Assessment utilises the HUDU Rapid HIA Tool (2019) to consider the health impacts of the proposed development. We recommend that the developer consult the NHS South East London Clinical Commissioning Group for advice on the impact on local healthcare provision and also re-examine the sections relating to public transport and car use.</p>	<p>sustainable travel will be secured via S106 legal agreement.</p> <p>Issues discussed in the Transport, Access, Servicing and Parking section of this report. Parking arrangements are considered appropriate in this instance given the local circumstances.</p> <p>Contribution towards local health infrastructure has been agreed and will be secured via S106 legal agreement.</p>
Transport and Highways	<p>The layout of the site is not considered suitable for adoption.</p> <p>The site is approximately 900m from Plumstead Station and within reasonable walking distance to 2 bus routes. It therefore has poor access to public transport having a PTAL of 2 on a scale of 1 to 6, (where 6B is excellent).</p>	<p>Noted.</p> <p>Noted.</p>

	<p>The site is not located within a Controlled Parking Zone (CPZ) and the roads locally are largely unrestricted. While there is fair demand for parking in the area, where there is limited opportunity for parking, it is considered to be at a premium and additional demand will exacerbate existing problems for residents, businesses and visitors. Any parking not accommodated on site as part of the proposal would have to be met by kerbside availability.</p> <p>As part of the application, the developer's traffic consultant has provided a Transport Statement to predict the likely travel demand to and from the development. It is estimated that most trips will be via public transport and given the relatively low number of vehicle movements expected the development is unlikely to have any significant effect on traffic and could be accommodated on the highway network. Given the reliance on travel associated with the development by modes other than the car, it is recommended that contributions be sought towards public transport and improvements to footways nearby.</p> <p>With regard to parking, Policy T6 of The London Plan highlights that although the starting point for new developments in areas of good access to public transport with CPZ restrictions should be car free, it does acknowledge that where this is not the case some parking could be accepted.</p>	<p>Noted.</p> <p>£270,000 will be secured towards increasing public transport capacity. Upgrades are proposed to the footpath running adjacent to the site boundary. This will be secured through the S106 legal agreement.</p> <p>The proposed parking levels are considered acceptable, given the lack of existing public</p>
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	<p>Table 10.6 of the London Plan indicates that in inner London sites with a PTAL of 2 should have a maximum car park requirement of up to 0.5 space for each unit. It is indicated in Policy T6 that Inner London boroughs (such as RBG) should not adopt minimum standards. Policy would therefore require up to a maximum of 166 spaces to be provided. It is however accepted that the site is on the peripheral of the OAPF area where restricted parking levels should be sought although it is also accepted that the development is coming forward ahead of the public transport improvements envisaged in it. As a compromise, the level of parking is proposed to be at 0.39. Any permission granted should be subject to a Car Park Management Plan. Although a draft management plan is indicated it infers that spaces are allocated rather than a general permit system and does not indicate how the spaces are to be allocated. The allocation of a particular space prevents the flexibility to change the space in the future i.e. for EVCP or for the disabled, or car club etc. A general permit system is therefore preferred.</p> <p>Given the potential shortfall in parking that could arise if not all demand is met on site, it is possible that parking could arise on street. A parking survey was therefore undertaken to ascertain the level of stress in the locality. The survey was carried out using recognised methodology and at a time when most local residents would be expected to be home. From those surveys it was identified that while there is fair demand for parking in the area, it is</p>	<p>transport infrastructure and parking restrictions on surrounding roads. A financial contribution to facilitate a consultation on the implementation of a CZP will be secured if permission is granted.</p> <p>A Car Park Management Plan will also be conditioned.</p> <p>Noted.</p>
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	<p>expected that overspill parking could be accommodated on street.</p> <p>With regard to accessible parking for blue badge holders residents in the development, it is recommended that only 3% of dwellings should have a space from the outset although an additional 7% of dwellings could be provided should the need arise over time. The location of these w/c spaces should be positioned reasonably near to the units they serve but seem somewhat remote.</p> <p>It is also recognised that car use may still be required on an ad-hoc basis and it is proposed that use of a car club is encouraged and will also reduce the need for private car ownership.</p> <p>While there is a segregated cycle way along the western side of Pier Way, there are several deficiencies in it for modern day use. In order to encourage sustainable travel, a contribution should be sought towards improving cycle facilities in the area consistent with the Council's Cycling Strategy. Also, in line with the SPD requirement, a contribution should be sought toward cycle training.</p>	<p>Revised plans show 3% provision from the outset. Parking management plan to be secured by condition to demonstrate capacity to increase this provision should future demand arise.</p> <p>Formation of a car club to be secured through S106 agreement. All residents within the development to awarded complementary 5-year membership.</p> <p>Financial contribution towards improving existing cycle lane has been agreed. Cycle training contribution also agreed.</p>
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	<p>In line with London Plan policy T5, it is recommended that adequate cycle provision is made.</p> <p>A requirement should be sought to provide a Travel Plan which includes measurable targets and monitoring in order to promote sustainable travel for future residents. Personalised Journey Planning could positively influence journey patterns from the start. A Travel Plan for workers will also be required.</p> <p>A draft Construction Management Plan is provided but one providing greater detail should be conditioned.</p>	<p>Cycle parking spaces in line with London Plan requirements. Final details to be secured via condition.</p> <p>Travel Plan to be secured through S106 legal agreement.</p> <p>CMP to be secured via condition.</p>
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7.8 Local Residents

7.9 Four hundred and forty-one (441) neighbouring addresses were consulted via letter. Site notices were also displayed in the vicinity of the site and a press notice published.

7.10 The scheme has received 26 objections. A summary of the consultation responses received along with the officer comments are set out in table below:

Summary of Comments	Officer's comments
Height of proposed tower not in keeping with the area.	While not located in an area designated for tall buildings, given the location of the proposed tower adjacent to the Broadwater Dock, it is considered that in this instance the

	proposed 12 storey element can be supported.
Would bring too many people into an already crowded area	The site is located within the Thamesmead Strategic Development Location in which new housing is expected to be developed.
Infrastructure is already struggling to cope. Local facilities such as schools, GP surgeries and public transport will not support the increase in the number of additional residential dwellings.	Capacity of local schools is considered to be sufficient to absorb the expected child yield of the development, while financial contributions will be secured to mitigate the impacts on public transport and health infrastructure.
Development will remove the green landscape of the existing Care Home buildings.	The proposal provides multiple areas of open space throughout the development, while simultaneously making more efficient use of the land. The proposal would also include a new publicly accessible play equipped pocket park to the southern end of Pier Way, where the current open space on site is inaccessible on private land. The proposal is therefore considered to be an improvement.
Parking is already at a premium and the development would worsen this.	Car parking arrangements have been carefully considered, with on-site provision included so as to ensure there would not be any unacceptable parking overspill onto surrounding roads. A financial contribution towards a CPZ consultation would also be secured, which if agreed by residents would mean that future developments within the area could be delivered as car-free.
Existing properties will lose value.	The value of properties is not a material planning consideration.
Do not support any development that affects any listed sites or landmarks.	The impacts of the development on heritage assets has been considered and found to be acceptable. Full discussions on this point are set out in the Design, Townscape, Public

	Realm and Heritage section of this report.
Loss of views for existing properties.	Loss of private views is not a relevant planning consideration. Development has been assessed in regard to the impact on outlook of neighbouring properties more generally and found to be acceptable.
Buildings will block out light to neighbouring properties.	The submission included a Daylight, Sunlight and Overshadowing assessment which has been reviewed by Officers and was found to be acceptable. Full commentary on this point is set out in the Neighbouring Amenity section of this report.
Lack of space for children or families.	The proposal includes sufficient amounts of child play space, in accordance with the requirements of the GLA's Child Play Space Calculator. Playspace within the pocket park at the southern end of the site would be publicly accessible and would thus benefit the wider community.
Whilst under construction there will be major disruption with noise, increased traffic etc which will worsen quality of life for neighbouring occupiers.	Impacts during demolition and construction will be managed through appropriately worded conditions.
Loss of privacy and increased overlooking.	Development has been assessed in regard to privacy and overlooking and has been found to be acceptable. Full discussions are set out in the Neighbouring Amenity section of this report.
There are no precautions listed on how the developer is intending to keep roads and adjacent pavements safe, so children can safely walk to school without risking collision with site vehicles.	A construction management plan will be secured via condition.
Increase in population will bring an increase in crime.	The applicant has worked closely with the Metropolitan Police to ensure the development is designed

	in a way to deter crime. Moreover, a secure by design condition will be attached to any permission.
Object to the loss of the existing care home as there is a care home shortage.	The existing care home has been vacant since 2019 and the Council's Adult Social Care team have confirmed that its loss will not have a harmful impact on care provision within the borough.
The Council has significant climate change commitments. Adding 130+ car parking spaces seems incompatible with this.	Delivery of a car-free scheme is not presently viable in this location due to the lack of local parking restrictions. However, the development would secure funding for a consultation to implement such measures which would mean future developments could be secured as such. Moreover, the development would deliver a wide range of other sustainable measures, as set out in the Sustainability and Energy section of this report.
Five-storey block at the Broadwater Road/Pier Way roundabout will completely destroy the "green" currently visible from the roundabout and risks creating a tunnel effect all along Pier Way (which currently is a beautifully tree-lined road).	Whilst existing open space would be reduced, the development would deliver a pocket park to the southern corner of the site. The frontage on Pier Way has also been designed with breaks at upper floors to reduce the impact of the massing. Buildings on the opposite side of Pier Way are two-three storeys in height and have significant spacing between one another, which would ensure there would be no tunnelling effect along the road.
Having large blocks of flats along these footpaths will make them less inviting. Less people will use them.	Active frontages along Pier Way will increase security through passive surveillance, thereby improving pedestrian safety in comparison to the existing arrangement which has no primary windows overlooking the street.
The Council should make any planning permission strictly	Affordable Housing provision is in line with the Council's policy

conditional on appropriate levels of affordable housing.	requirements and in excess of those set out in the London Plan. This will be secured through S106 legal agreement.
Some other community project should be built such as a playground for children. My son doesn't have a place to play and he plays on the street with his friends.	Development would provide an equipped pocket park to the southern corner of the site which would be publicly accessible.

8. Planning Context

8.1 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 – 2021)**
- **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.

8.2 For full details of relevant SPD / Documents refer to Appendix 3.

9. Planning Considerations

9.1 The planning considerations relevant to this application are as follows:

- Principle of Development
 - Loss of Care Home
 - Principle of Residential Use
 - Land Use Conclusions
- Proposed Unit Mix
- Affordable Housing
 - Overall Provision of Affordable Housing
 - Proposed Tenure
 - Distribution of Affordable Units
 - Mayor’s Fast Track Route
- Standard of Accommodation
 - Size of Units
 - Wheelchair Units
 - Fire Safety

- Aspect
- Daylight to Proposed Units
- Sunlight to Proposed Units
- Urban Greening
- Design, Townscape, Public Realm and Heritage
 - Site Layout, Public Realm and Landscape Design
 - Height, Massing and Form
 - Architecture
 - Townscape
 - Heritage
- Open Space and Children’s Play Space
- Neighbouring Amenity
 - Daylight and Sunlight Impact to Neighbouring Properties
 - Overshadowing Impact to Neighbouring Properties
 - Outlook/Sense of Enclosure
 - Privacy
- Wind and Microclimate
- Transport and Highways
- Sustainability and Energy
 - Compliance Part L 2013 Base Case
 - Be Lean
 - Be Clean
 - Be Green
 - Overheating and Cooling
 - Cumulative Carbon Savings & Carbon Offset
 - Whole Life-Cycle Carbon Assessment
 - Be Seen Energy Monitoring
 - RBG Renewable/Low Carbon Energy Monitoring
 - Sustainable Design and Construction Standards
- Ecology and Biodiversity
- Noise and Vibration
- Air Quality
- Land contamination
- Flood Risk and Surface Water
- Refuse
- CIL
- Legal Agreement
- Public Sector Equality Duty (PSED) and Human Rights

10. Principle of Development

Loss of Care Home

- 10.1 The current proposal seeks to demolish the existing care home on site. To this end, Policy H8 of the London Plan outlines that the loss of supported accommodation (such as care homes) that meets an identified housing need should be satisfactorily re-provided to an equivalent or better standard. This is because care home accommodation (Use Class C2) is an important element of the suite of accommodation options for older Londoners and to meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year. In addition, Policy H12 states that the delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. Core Strategy Policy H(d) (Supported Housing) sets out the Council's policy for proposals involving residential care homes, hostels, cluster flats, refuges and other supported accommodation. However, it is noted in the supporting text (para. 4.1.48) it states that proposals that result in the loss of supported housing will take into account the continued local need for such housing.
- 10.2 The site is currently occupied by a former 86 bed care home (Use Class C2) across 6 buildings. The care home as a land use would not be provided as part of the proposed scheme. The site ceased care operations in 2019.
- 10.3 In order to justify the loss of the existing care home, the applicant has provided a Market Analysis and Viability Appraisal, with the conclusions of the report asserting the following:
- The care home is an obsolete first-generation purpose-built facility and despite being a fairly large, the setting is hampered through a combination of factors including the campus style layout with accommodation arranged over a collection of five small, poorly specified individual buildings which need to be staffed individually. Whilst historically it was possible to sustain such operations through substantial block contract arrangements, commissioning policies have changed over the years with better quality stock entering the market and these block contracts falling away.
 - Upgrading the accommodation would not be financially viable or economic as bedroom space will be lost, making the individual living units even more inefficient to operate.
 - A review of demand/supply dynamics within the Greenwich Borough do not substantiate a need for additional care home provision. Greenwich is the 5th best provisioned Borough in London with commissioning policy stating that there is no need for additional care home provision.
 - Neither the demand vs supply outputs or the affluence profile of the area provides a robust or compelling case for a new care home development.
 - The cost of redeveloping the Property to a high quality 80 bed scheme is not financially viable.

- 10.4 In assessing the proposed loss of the care home, Officers have consulted with the Council's Adult Social Care (ASC) team who oversee such provision within the borough.
- 10.5 The ASC team have highlighted that as the existing care home had formally ceased operations in 2019 there was no immediate impact to local capacity. Moreover, it was highlighted that there was a sustained levels of capacity in the market for the last 12 months, with some existing providers forced to close individual units to reduce operational costs whilst occupancy has been lower. As a result of these partial closures, there is potential to work with these existing providers to increase capacity should the need arise.
- 10.6 In addition to the above, it was highlighted by ASC that there had been an overall reduction in care home placements since the Covid-19 pandemic, with a revised market position statement for older people accommodation to ensure the market had the information to respond to the needs of the local population for the short to medium term future. Furthermore, since the start of the pandemic the "Home First" initiative has been further developed within the borough to support people to return home as a priority which will further support the reduction in care home placements as more people are supported to live at home for longer.
- 10.7 The applicant also explored the option of providing extra care (Use Class C3) as part of the redevelopment of the site. Unlike dedicated care facilities, extra care is designed to provide a reduced level of care for residents who only need supper intermittently, thereby allowing them to maintain a level of independence. Unfortunately, however, the two registered providers currently operating such services in the borough both declined involvement, highlighting that the lack of amenities in the local area rendered the site impracticable for such a proposal. This was also reiterated when another registered provider who was looking to expand into Greenwich was approached.

Provision of Residential Units

- 10.8 Policy H1 of the London Plan seeks to increase the supply of housing in the capital, setting Greenwich a ten-year net housing completions target of 28,240 net housing completions. Moreover, Table 2.1 of the London Plan identifies an indicative capacity for 8,000 new homes and 4,000 new jobs within the Thamesmead and Abbey Wood Opportunity Area. Policy H1 of the Core Strategy also confirms that new housing is expected to be developed in Royal Greenwich's six Strategic Development Locations, including the Thamesmead Strategic Development Location within which the

application site is located. Opportunity Areas are London's major reservoir of brownfield land with significant potential to accommodate new housing, with it expected that at least 99% of the development built in Royal Greenwich will be on brownfield sites.

- 10.9 The proposed development would deliver 333 new homes on what is now a vacant brownfield site, contributing to the borough's housing target, boosting the supply of housing in accordance with the NPPF and concentrating development and growth in an Opportunity Area and a Strategic Development Location, as per the objectives of the London Plan and Royal Borough of Greenwich's (RBG) Core Strategy.
- 10.10 Notwithstanding the above, concerns have been raised by local residents about the potential impact of the proposed development on amenities within the area, specifically impacts on the capacities of local schools and GP surgeries.
- 10.11 In regard to schools, there is considered to be sufficient capacity within the local area to absorb the predicted number of children which the development would yield. To this end Officers also note that the Borough's Education/Children's Services team were consulted and raised no objections to the proposal, nor did they outline that any contributions would be necessary to offset the impacts of the proposal.
- 10.12 In addition to the above, Officers have also consulted NHS London Healthy Urban Development Unit (HUDU) regarding the proposal and its potential impact on local health infrastructure. NHS colleagues dismissed the applicant's original assertion that because the three GP surgeries in the area were taking on new patients this meant there was sufficient capacity, highlighting that services will be stretched with longer waiting times for existing patients before a practice may close its list to new patients. On this basis it was agreed with the applicant that a financial contribution of £318,000 would be made to the South-East London Clinical Commissioning Group to allow additional health capacity to be provided alongside the arrival of the new population. Said funding would go towards GP and primary healthcare provision, as well as mental health care. Subject to this funding, which would be secured through the S106 legal agreement, it is considered that the proposal would adequately mitigate impacts on local amenities.

Land Use Conclusions

- 10.13 Given the above, Officers are satisfied that there is not an identified need for the Gallion's View Care Home, with the move towards "Home First" model likely to reduce the overall care home needs of the borough in the coming

years. It has also been confirmed that other existing care home facilities in the borough are operating at a reduced capacity, with scope to increase this should further demand arise. It is therefore considered that the existing facility would not require retention or reprovision, as Policies H8 and H12 of the London Plan specify this should only be sought when there is an identified housing need.

10.14 In weighing up the loss of the existing care home Officers have also had regard to the public benefits which would be delivered by the proposal. These include:

- A 35% affordable housing offer (41.7% by habitable room), with the majority of larger family sized units and all of the single family dwellinghouses within the scheme provided as affordable;
- Delivery of a balanced and mixed community;
- A new publicly accessible open space to be provided at the southern corner of the site, which would include children's play area;
- Equipped play areas throughout the site;
- Incorporation of public art throughout the development which is to be commissioned by local artists (to be secured by condition);
- A financial contribution towards increasing bus frequency during peak period;
- A financial contribution towards health infrastructure in the locality;
- Improvements to the existing cycle lane on Pier Way; and
- Financial contribution towards public realm improvements.

10.15 As such, the proposed development is considered acceptable in land use terms, subject satisfactory conclusions of the remaining planning considerations.

11. Proposed Unit Mix

11.1 Policy H10 of the London Plan (Housing size mix) states that schemes should generally consist of a range of unit sizes, having regard to the requirement to deliver mixed and inclusive neighbourhoods, the need to deliver a range of unit types at different price points, the mix of uses, the range of tenures, the nature and location of the site, PTAL, the need for additional family housing and the role of one and two bed units in freeing up existing housing by providing an alternative to conversions and subdivisions, with the aim of optimising a site's potential.

11.2 Policy H2 of the Royal Greenwich Local Plan states that a mix of housing types and sizes will be required in all developments, including conversions,

and developments should contain a proportion of 3, 4 and 4+ bedroom units. The exact mix on each site will vary according to the location of the development and the character of the surrounding area. The supporting text of Policy H2 further sets out that there is an objectively-assessed need for larger affordable homes within the borough, especially affordable rented tenures, and consequently, developments should seek to address this by prioritising larger family homes within the affordable elements of the scheme, and a correspondingly greater proportion of 1 and 2-bedroom units within the private sale elements.

11.3 The current development proposes the following mix:

Unit Type	Market	Percentage (%)	Affordable	Percentage (%)	Total	Percentage (%)
Studio	12	6%	0	0%	12	4%
1 bed	67	31%	21	18%	88	26%
2 bed	116	54%	51	44%	167	50%
3 bed	21	10%	45	38%	66	20%
	216		117		333	

11.4 While it is noted that the overall provision of larger family sized units is limited to 20% in total, they nevertheless form a much higher percentage of the affordable offer at 38% which is a positive element of the scheme. The proposals also include the provision of ten single family dwellinghouses, all of which are to be provided as affordable. Furthermore, while not classed as family sized, 2-bedroom units can also be used by small families.

11.5 As set out in London Plan Policy H10B, it is for boroughs to provide guidance on the size of units required in the social/affordable rent sector to ensure that affordable meets identified needs. Paragraph 4.10.1 goes on to state that because the 2017 London SHMA identifies the full range of needs between 2016 and 2041, boroughs may wish to prioritise meeting the most urgent needs earlier in the period, for example by prioritising social/affordable rented units of particular sizes. Analysis of the waiting list confirms that the priority need is for family sized accommodation.

11.6 It is therefore considered that the proposed development provides an acceptable mix of unit types in accordance with Policy H2 of the Core Strategy and Policy H10 of the London Plan.

12. Affordable Housing

Overall Provision of Affordable Housing

- 12.1 Policy H4 of the London Plan, sets a strategic target of 50% affordable housing in all new developments. Policy H5 of the London Plan sets out the 'threshold approach' to planning applications which trigger affordable housing requirements whereby schemes that meet or exceed the relevant threshold of affordable housing by habitable room without public subsidy, meet the relevant tenure mix and meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor are eligible to follow the Fast-Track Route. The threshold level of affordable housing on gross residential development is initially set at a minimum of 35% (measured by habitable room). Core Strategy Policy H3 requires major residential developments to provide at least 35% of units as affordable. The precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and of the development, including financial viability.
- 12.2 The current development proposes 35% affordable housing provision measured by units, which would meet the requirements of Core Strategy Policy H3. Moreover, when the proposed provision is measured per habitable room as is set out in the London Plan, it increases to 41.7%. It is noted that the latter is the preferred measurement tool of the GLA, as this results in larger sized units being given over to affordable housing. To this end, the proposal would represent provision in excess of the 35% London Plan requirement.

Proposed Tenure

- 12.3 Policy H6 of the London Plan sets out that the tenure split of affordable units should meet a minimum of 30% low-cost rent and 30% intermediate, with the remaining 40% to be determined by the Local Authority. In Greenwich, the supporting text of Core Strategy Policy H3 sets out the desired tenure split in the borough is 70% social rent and 30% intermediate so as to create mixed and balanced communities.
- 12.4 In this instance, the application proposes a 100% social affordable tenure, specifically as London Affordable Rent. Policy H6(B) sets out that the Fast-Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold level is reached. In addition, the Council's Core Strategy Policy H3 states that the precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and of the development, including financial viability. In this instance, the application proposes 41.7% by habitable room or 35% by unit. It is also acknowledged that the Royal Borough's specific housing needs are weighted

towards a greater need for social housing products over intermediate. Officers have also had regard to the input from registered provider Optivo, who are to partner with the developer in delivering the scheme and have outlined their preference for a 100% social scheme due to the needs of the local community, together with current uncertainty in the housing market as a result of the Covid-19 pandemic, which has seen purchasing of properties slow significantly. Officers are therefore comfortable supporting the proposed tenure in this particular instance, as are the RBG Housing team who were also consulted. It should however be noted that this is as a result of the considerations in relation to this application alone, and would not set a precedent on any other development scheme within the borough, present or future.

Distribution of Affordable Units

- 12.5 The supporting text of Core Strategy Policy H3 states that affordable housing should be distributed across development sites to help create mixed and balanced communities.
- 12.6 The proposed development would see a mixture of market and social units located within Block B, with the smaller Blocks C and D provided as 100% affordable and Block A as 100% Market. This is considered to be an acceptable arrangement, as it would see three of the four blocks on site featuring affordable tenures. Furthermore, it is noted that the provision of the smaller blocks to the north of the site as 100% affordable will ultimately minimise service costs for future respective tenants due to the single core design of the buildings, which is welcomed.
- 12.7 The provision of all proposed single family dwellinghouses as affordable is also strongly welcomed. Such properties are in high demand within the social rented sector, with the current proposal helping to directly address this need. It is noted that the provision of the smaller flatted blocks and single family dwellinghouses as affordable does result in a concentration of affordable units to the north of the site. However, the benefits which would be brought about by this, namely lower service charges for residents, easier management and provision of genuinely affordable family dwellinghouses is considered to greatly outweigh this.
- 12.8 On this basis no objections are raised to the proposed distribution of affordable units within the development.

Mayor's Fast-Track Route

12.9 Policy H5 of the London Plan outlines that “Fast-Tracked” applications are not required to provide a viability assessment at application stage. This occurs when applications meet all of the following criteria:

- meet or exceed the relevant threshold level of affordable housing on site without public subsidy;
- be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure);
- meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant; and
- demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.

12.10 In this instance, the application exceeds the relevant threshold level for affordable housing without public subsidy. While the proposal does not follow the 30/30/40 tenure breakdown set out by Policy H6 of the London Plan (discussed above), it addresses the Royal Borough’s specific housing needs for social housing products over intermediate. It is therefore considered that the proposal is acceptable for the Fast-Track route. Nevertheless, an early review mechanism would still be required, to be triggered if an agreed level of progress on implementation has not been made within two years of granting planning permission.

13. Standard of Accommodation

13.1 London Plan Policy D6 requires all housing developments to be of the highest quality design and provide adequately-sized rooms with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Table 3.1 of the London Plan outlines the relevant standards for residential developments in London, while the Nationally Described Space Standards set out the national requirements. This is supported by Core Strategy Policy H5.

Size of Units

13.2 All units across the proposed development would either meet or exceed the minimum internal space standards. Private amenity spaces would be provided for every unit, with flats served by either balconies or terraces and dwellinghouses by private rear gardens. In addition to the private balconies and terraced, flats within Blocks A and B would also have use of communal first floor podium amenity spaces.

13.3 All balconies and terraces serving flats would meet or exceed the minimum London Plan requirements, which set out that a minimum of 5sqm for 1-2 dwellings and an extra 1sqm for each additional occupant. The London Plan does not set out any separate amenity space requirements for gardens serving dwellinghouses, but the supporting text of Core Strategy Policy H5 does stipulate that gardens a minimum garden area of 50m² should be provided in houses with up to three bedrooms. To this end, six out of the ten houses would exceed the 50sqm requirement, with the remaining four dwellings having gardens ranging in size from 37.9sqm to 46.3sqm. Whilst these amenity spaces would fall below the minimum core strategy requirement it is noted that future residents would have access to the public amenity spaces which are to be provided as part of the scheme, with the closest of these featuring children's play equipment and being just some 75m to the north. On this basis no significant concerns are raised to the shortfall.

Wheelchair Units

13.4 Policy H5 of the Core Strategy requires 10% of the dwellings be built to full wheelchair standards. Policy D7 of the London Plan (2021) requires that 90% of units to meet Building Regulations requirement M4(2) 'accessible and adaptable dwellings' and 10% of new housing must meet Building Regulations requirement M4(3) 'wheelchair user dwellings' (i.e. be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users). London Affordable Rented units would be expected to be delivered to a fully accessible standard and private/intermediate units would be expected to be easily adaptable.

13.5 The scheme would deliver 33 wheelchair units, which would equate to 10%, in accordance with the above policy. The details have been reviewed by the Occupational Therapist, who raised a few areas of non-compliance, but confirmed these could be handled at submission of details stage.

13.6 Fire Safety

13.7 London Plan 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.

13.8 London Plan D5 also asserts that development proposals should achieve the highest standards of accessible and inclusive design and includes requirements

for developments to be designed to incorporate safe and dignified emergency evacuation for all building users.

- 13.9 An Outline Fire Safety Strategy has been submitted as part of the application. The report has been prepared by Ashton Fire on behalf of Fairview New Homes. The report details how the scheme has been designed and will operate in accordance with London Plan Policies D5 and D12.

Aspect

- 13.10 Two hundred and twenty-six (226) of the three hundred and thirty-three (333) proposed units would be dual aspect, which represents 68% of dwellings. Of the remaining one hundred and seven (107) single aspect units, none would be north facing. Given the majority of units would be dual aspect, with no single aspect units being north facing units, this is considered to be an acceptable arrangement.
- 13.11 The majority of units across the proposed development would be provided with good levels of outlook. Outlook would be restricted for a handful of single aspect market units, which would have views limited to inside the internal courtyards areas of the podium blocks. However, the developer has sought to mitigate this through the introduction of breaks in the elevations of the larger blocks, thereby allowing views out past the courtyard areas. Given this is limited to a handful of units it is considered that, overall, the arrangements are acceptable.
- 13.12 Units would be afforded good levels of privacy, with the majority of window-to-window separation distances within the site being in excess of 20m. Distances between units within the two smaller flatted blocks and the proposed dwellinghouses opposite would be reduced to 16m, but this is not considered unreasonable and would reflect similar arrangements within the adjacent Camelot Close. Concerns were raised with the applicant regarding the separation distances between the west facing balconies serving the smaller blocks and the first-floor windows of the dwellings opposite, which would be some 15m apart. In response the applicant amended the design of dwellings to provide a protruding angular window, thereby avoiding direct views into the bedrooms. Final treatment of the windows will be secured via condition. However, in principle it is considered that the design amendment addresses concerns raised by Officers, while simultaneously adding additional visual interest and internal floor space to the proposed dwellings.

Daylight to Proposed Units

- 13.13 The internal daylight assessment submitted with the proposal demonstrates a high level of compliance with the BRE guidelines for internal daylighting, with 93% of the habitable rooms achieving the BRE targets for average daylight factor. Where levels fall below the targets, in the majority of cases shortfalls were a result of the provision of separate kitchen/diners from the main living areas (resulting from the affordable tenant requirements), large open plan living spaces served by balconies, or minor shortfalls from the BRE targets which are unlikely to be perceptible to the occupants. Moreover, where kitchens are to be separated from the living spaces, in all of these cases these units feature well-lit living areas, as recommended by the BRE guidelines. These are considered to be reasonable and common trade-offs in design and are acknowledged by the BRE guidelines as typical constraints for larger flatted developments.
- 13.14 The developer also tested the development without balconies in place, with the results showing that all of the main living areas would fully meet the BRE daylight targets. Given the balconies provide valuable private amenity space and will themselves benefit from good levels of daylight, it is considered that the impact of their inclusion on the overall daylight levels is acceptable.

Sunlight to Proposed Units

- 13.15 In respect of direct sunlight, the focus of the BRE sunlight guidelines is on main living rooms rather than bedrooms and kitchens which are considered less important:

“3.1.2 In housing the main requirement for sunlight is in living rooms, where it is valued at any time of day but especially in the afternoon. Sunlight is also required in conservatories. It is viewed as less important in bedrooms and in kitchens”

- 13.16 Levels of direct sunlight to the living spaces would be lower, with 175 (45%) of the 387 main living rooms within the proposed development achieving the recommended target levels for sunlight. This is based on the Annual Probable Sunlight Hours (APSH) test, which calculates the percentage of probable hours of sunlight received by a window or room over the course of a year. However, 161 (42%) of these rooms are within 90° of due north and therefore see their potential for direct sunlight constrained by the orientation of the development. To this end, BRE guidance does outline that while the aim should be to minimise the number of dwellings whose living rooms face north, it does acknowledge that in larger developments, especially of flats, it may not be possible to have every living room facing within 90° of south.

13.17 When considering the main living rooms within 90° of due south, 161 (71%) of living rooms achieve the recommended sunlight levels of at least 25% for total annual levels and 5% for the winter. The vast majority of main living rooms within the development have been provided with private amenity space in the form of balconies and terraces which impact sunlight compliance. This is clearly illustrated by the results of these assessments with the balconies removed, which show that all 226 (100%) of the south facing rooms would fully meet the BRE criteria for APSH. Given the valuable private amenity which such spaces provide, and given that these spaces themselves would be mostly well served by direct sunlight, this is considered to be an acceptable trade off.

13.18 Returning to the living spaces which would be within 90° of due north, it is acknowledged that at 42% this represents a high proportion of the overall living spaces. However, in addition to the fact that BRE guidance acknowledges that in larger flatted developments it is not always possible to avoid this, Officers also have regard to paragraph 125 of the NPPF. This states that when considering applications for housing, Local Authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). Similarly, the BRE guidance sets out that, although it gives numerical guidelines, these should be interpreted flexibly since natural light is only one of many factors in site layout design.

13.19 With the above in mind, all other aspects of the proposed living standards are considered acceptable, with units afforded good levels of outlook, privacy, daylight, internal space and amenity. Furthermore, Officers also have regard to the wider public benefits which would be delivered by the scheme, which include:

- A high level of affordable house, of which 38% would be provided as family sized units, thereby serving to meet the social housing needs of the borough;
- A financial contribution towards an additional bus service during peak periods;
- creation of a car club in the area which could be utilised by the wider community and promotes sustainable travel;
- improvements to the existing cycle lane on Pier Way;
- a financial contribution to fund a controlled parking zone (CPZ) consultation in the area;
- a financial contribution towards health infrastructure in the locality;
- the creation of a new area of public space featuring children's play equipment to the southern corner of the site; and

- a financial contribution towards employment and training in the borough;

13.20 Given the multiple public benefits which would be delivered by the scheme, together with the guidance set out in the NPPF and by BRE regarding flexible interpretations of results, it is considered that the proposal would be acceptable.

14. Urban Greening

14.1 London Plan Policy G5 states that development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

14.2 The Urban Greening Factor (UGF) provides an assessment of design proposals in relation to the quantity and functionality of urban greening. The London Plan recommends a target score of 0.4 for predominately residential developments.

14.3 In accordance with Policy G5 opportunities for Urban Greening have been maximised across the site which has an Urban Greening Factor of 0.42-0.46, exceeding the Mayor's target

15. Design, Townscape, Public Realm and Heritage

15.1 Paragraph 126 of the National Planning Policy Framework states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve, and that 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.

15.2 The design principles in chapter 3 of the London Plan expect all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality. As per Policy D3 of the London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth.

15.3 Core Strategy Policy DH1 similarly requires that proposals must demonstrate an understanding of the existing context of the area and to promote local distinctiveness by providing a site-specific solution. The policy also requires developments to provide a positive relationship between the proposed and existing context, paying particular attention to the scale, height, bulk and

massing of the adjacent townscape; and create attractive, manageable, well-functioning spaces within the site. This is supported by London Plan Policy D3, which are divided into 3 general elements: Form and layout, Experience, and Quality and Character.

Site Layout, Public Realm and Landscape Design

- 15.4 The proposed layout is the outcome of a comprehensive design process and negotiation with the Local Planning Authority and aims to respond to a number of coexisting constraints regarding the redevelopment of this site. These include its relationship with the surrounding context, including Broadwater Dock to the east, Community Open Land to the north and the neighbouring low-rise houses at Camelot Close, its low PTAL 2 and the existing network of streets and accesses to the site.
- 15.5 The proposed development will provide 333 residential units comprising 10 houses and 323 apartments across 4 blocks. The largest of the apartment blocks (A & B) would be located at the front of the site, with the remaining two apartment blocks to be located along the north-eastern site boundary, to the north of Block B. The ten dwellinghouses would be located along the north-western boundary of the site. A new vehicular route will connect the site to the existing vehicular access point on Pier Way.
- 15.6 Due to the low level of public transport accessibility to the site a level of on-site private car parking was considered necessary, the rationale for which is further discussed in the Highways section of this report. As a result, 129 parking spaces are proposed (0.39 cars per residential unit). In order to ensure that the development is not dominated by cars at street level two ground floor enclosed car parking areas have been designed within Blocks A and B on the southern side of the site, to provide a total of 98 parking bays. A further 6 spaces would be provided on-plot for the proposed dwellinghouses and the remaining 25 car parking bays would be distributed across the site's internal access roads. This is considered to be a good design outcome.
- 15.7 The deck courtyards above the car parking are considered adequate in size, with their average width exceeding 20m. They would provide secured communal amenity in addition to the designed public amenity space on the site.
- 15.8 As mentioned above, the proposal retains the existing vehicular access to the site from Pier Way, next to the boundary wall with the Camelot Close estate. While this is possibly not the most effective approach in terms of addressing the exposed frontage of neighbouring rear-gardens and creating a more gradual transition with the proposed massing on the site, it is considered

acceptable in design terms, as all alternative locations for this access were explored by the applicants and refused by the Council's Highway Team due to problematic interfaces with the existing network of streets. As part of the landscaping condition, particular attention will be paid to the detailing of the proposed green buffer, with trees adjoining the neighbouring properties to ensure that it would be visually appealing whilst simultaneously enhancing the perceived security of those rear gardens and the streetscape of the proposed development.

- 15.9 The existing timber fences of the neighbouring gardens are in poor conditions and are to be replaced with a 1.8m closed board fence as part of the development. Details of this will be included in the associated landscaping condition.
- 15.10 On the northern part of the site, the scheme is well integrated within the surrounding context. A row of two-storey and pitched-roofs houses effectively mediates between the low-rise fabric at Camelot Close and the mid-rise Blocks C and D designed on the dock side. The designed buildings define a street with an appealing domestic character, marked by the designed front doors, soft landscape with trees and pattern of pavements.
- 15.11 The open space on the site has been designed with a good balance of soft and hard surface and the breaks between block create an adequately level of permeability across the site and towards the dock. To the south, a generous green open space with integrated play equipment defines a welcoming pedestrian and cycle access to the scheme from the Pier Way roundabout, and an inviting interface with the neighbouring developments to the south and east. A landscape pedestrian pathway would effectively activate the front of the scheme towards the dock, incorporating a green strip with trees and the accesses to the ground floor residential units in the designed blocks B, C and D. Acceptable defensible space and green hedges are proposed in front of all units.
- 15.12 It is noted that the proposed pathway running along the eastern boundary of the site would be at a higher level than the existing public path lining the dock, with this being separated by a retaining wall and metal fences. While not an ideal design solution, it is acknowledged that changing land levels would require substantial engineering works to provide a level surface across the two. Nevertheless, access onto the existing path is provided at two points, one with an accessible ramp and the other with steps.
- 15.13 This issue, due to the existing conditions and constraints on the site, has some negative impact on the perceived safety and visual appeal of the existing pathway and is only partially mitigated by the proposed ramp and steps

connecting it to the scheme. Public artwork is to be incorporated along the boundary fence to improve the overall design quality of the existing and proposed pedestrian route, with the applicant committing to engage with local artists to produce the work. This is to be secured via S106 agreement.

- 15.14 The green area at the northern end of the site would provide additional amenity. It would receive an acceptable level of passive surveillance from the active frontages of the neighbouring residential units and the street terminating into its central play area. While no development to the neighbouring green site to the north is currently proposed, the applicant has provided indicative plans based on a previously consented development to show how the two sites could be integrated with pedestrian links – this is welcomed.
- 15.15 The proposed routes across the site have been thoughtfully activated by designing the great majority of the ground floor units with direct access from the street. This provides an attractive streetscape with active frontages throughout the development. Adequate green buffers and defensible spaces have been designed at the front of all the units. Different colours of block paving have been thoughtfully used to mark the different areas of the open space and the intended pedestrian-friendly character of the scheme. The on-street car parking has also been carefully integrated in the landscape design of the scheme, with the proposed on-plot parking for the houses proving beneficial to avoid any excessive car-parking on the relatively narrow street on the northern side of the site.
- 15.16 The proposed link to the existing cycling routes on Broadwater Road and Pier Way would contribute to mitigating any excessive insular character of the scheme and promote more sustainable and active modes of travelling. Further detail is expected at the next stage on the designed interface of the cycle pathway with the pedestrian pavement surrounding Block A, which still appears somewhat conceptual at this stage. This will be secured by condition.
- 15.17 The development would also deliver public realm improvements in the form of a new footpath along the site's frontage on Pier Way. This would be secured in the S106 legal agreement. Numerous trees would also be planted resulting in a significant increase in trees throughout the site and along the boundaries. This would integrate well with the surrounding streetscape, with existing roads featuring a large number of trees creating attractive green streets.
- 15.18 Overall, the proposed site layout, public realm and landscaping is considered acceptable in design terms.

Height, Massing and Form

- 15.19 The proposal incorporates a mix of building types, with heights varying from two storeys, for the terraced-houses, to twelve storeys for the proposed tallest block (Block B).
- 15.20 The proposed massing legibly steps down towards Camelot Close. The two-storey houses and the three-storey north-western frontage of Blocks A and B, create a legible mediation between the low-rise surrounding fabric and the bigger scale of blocks proposed towards the dock.
- 15.21 While the three-storey element of Block B would be only fourteen metres away from the neighbouring Camelot Close estate, it would face the flanks of two houses, each of them incorporating a single window. This is considered acceptable in design terms, also in consideration of the fact that the two neighbouring flanks are adjacent to the boundary of the site.
- 15.22 The proposed heights on Pier Way, varying from three to five storeys, are considered acceptable in design terms, as beneficial to mark the street roundabout and the access to the site, and to mediate between the different types in the surrounding context, including the two-to-three storey dwellings opposite Pier Way and the five storey blocks of School House, on the opposite side of the dock.
- 15.23 Any excessive monolithic feel created by the proposed courtyard blocks has been addressed by introducing some legible breaks between blocks, setbacks on façade and changes in material.
- 15.24 On the northern side of the site, the designed 19m gap between the first-floor elevation of the proposed terraced-houses and the rear elevations of the neighbouring dwellings at Camelot Close would be adequate in design term, and in consideration of the limited height of the proposed houses, which would further limit any excessive overshadowing towards the neighbouring amenities. This is discussed in greater depth in the neighbouring amenity section of this report.
- 15.25 The top-floor of the five-storey Blocks B and C has been thoughtfully setback from the internal street, to mitigate any excessive sense of enclosure on the street and overshadowing to the designed terraced houses. Triangular oriel windows have been integrated in the first-floor elevation of the houses to further mitigate any undesirable direct overlooking, as outlined in the standard of accommodation section above.

- 15.26 The blocks on the dock's side would create a legible mid-rise frontage with heights varying from five to seven storeys. Given the relief provided by the dock, it is considered that this scale would be appropriate and would sit well with the existing three storey townhouses opposite.
- 15.27 The variations in height, setbacks between segment elevations, arrangement of balconies and the gaps between the blocks are considered beneficial in breakup any excessive monolithic feel and the overall bulk of these buildings towards the dock side of the site.
- 15.28 Officers also have regard to Policy D9 of the London Plan which outlines that tall buildings should only be developed in locations that are identified as suitable in Development Plans. This is reaffirmed by Policy DH2 of the Core Strategy which outlines that tall buildings will only be acceptable in Woolwich Town Centre, Greenwich Peninsula, Greenwich Peninsula West, East Creekside, Charlton Riverside, Tamesis Point in Thamesmead, Thamesmead Town Centre, the area directly surrounding Abbey Wood train station, and 'the Hub' area surrounding Kidbrooke station. All other parts of the borough are outlined to be inappropriate for tall buildings.
- 15.29 In the context of the above, the development of the 12-storey tower would not be considered appropriate at the application site. However, as with all planning applications, the proposals must be assessed on their merits on a case-by-case basis. Policy D9 states that development proposals should address the following impacts:
- Visual Impact
 - Functional Impact
 - Environmental Impact
 - Cumulative Impact
- 15.30 The applicant has addressed the criteria in Policy D9 within the submitted application through the provision of relevant technical reports (including design and access statement, wind microclimate, daylight and sunlight assessment, transport assessment, noise assessment, air quality and verified views) which are discussed throughout the report.
- 15.31 The site's location directly adjacent to the Broadwater Dock provides a significant amount of relief, with the placement of the tower in the 'elbow' of the site allowing for separation distances of at least 45m from the townhouses on Whinchat Road and 63m from the School House flatted development. Similarly, it would be some 70m from the nearest properties on Camelot Close to the north. These distances are considered to provide sufficient visual relief, with massing and heights across the remainder of the

site stepping down to respond to the immediately surrounding townscape. The generous open space surrounding it, is considered beneficial to mitigate any excessive visual impact or sense of enclosure on the surrounding site.

15.32 The 12-storey element in Block B would create a focal point on this mid-rise frontage of buildings and act as the local marker for the dock and the surrounding area, approaching the site from all directions. Its form has been well designed and expressively subdivided into four elements, separated by slightly recessed brick-piers, which are beneficial to slightly reduce its perceived bulk and enhance its verticality. While being significantly taller than the surrounding blocks, the building looks well integrated within the overall scheme and the composition of blocks on the dock side. These specific site conditions would also mean that future developments would struggle to use the current proposal as a precedent should it be approved.

15.33 Furthermore, whilst the area may not be designated as being appropriate for tall buildings in the Local Plan, they nonetheless feature within the surrounding townscape. Specifically, a number of towers feature along the river front to the north, cited between Erebus Drive and the Thames Path. These towers range in heights from eight-storeys to 17-storeys. Given this, it is not considered that a taller tower element would appear incongruous within the surrounding streetscene or wider townscape. The height of the proposed tower, which has been reduced from 13 storeys to 12 over the course of the current application, would also remain subservient in height to the taller river frontage, which is considered appropriate. However, the design of the proposed tower is considered to be of a much finer design quality, with a brick finish to prevent unappealing ageing as observed in the existing towers and a great level of architectural detail to provide visual interest.

Architecture

15.34 The proposed terraced houses are contextual in character, with their proportions and pitched roofs legibly sympathetic to the neighbouring Camelot Close estate. Their red brick elevation is enriched by the designed canopies, generous openings including triangular oriel windows and grey brick lintels, which provide contemporary visual interest.

15.35 The mid-rise blocks have been designed with expressive variations in the brickwork colours, including buff, red and grey brick, legibly applied to the distinct elements and segment elevations of the buildings. Brick rustications, projecting and recessed courses, soldier courses, corduroy brickwork and alternated grey/buff courses are also utilised to mark the main parts and features of the buildings. The metalworks of the buildings, including the

balconies-posts and metal railings, entrance doors and canopies, windows and water pipes, create a leitmotif and a sense of unity around the scheme.

- 15.36 The design of the 12-storey tower follows the same partite of the rest of the scheme. Alternated buffer and grey brick courses are used to mark the lower two floors of the building. The middle section of the building is marked by the rational rhythm of balconies and windows with wet-cast fasciae, which enhance the intended vertical feel on façade. The top of the building, designed as a lighter brick-frame and recessed dark-brick elevation, is considered beneficial to express it as a local landmark and reduce its perceived bulk on long views. The visual breaks designed into the top of the tower would allow light to pass through during the day, softening the overall scale proposed. Roof plant has been be carefully positioned centrally and symmetrically to the main form of the building and enclosed by an expressive, textured, metal screen. Final details of plant treatment will be secured by condition.
- 15.37 Overall, it is considered that the proposed, simple design for all buildings, including the 12-storey block, would substantially rely on the construction materials, detailing and finishes, which should be of the highest quality. Therefore, a comprehensive condition is to be included for all materials and features of the buildings, to ensure that adequate discussion is undertaken at the post-approval stage and all materials and detailing are approved by the Local Planning Authority.

Townscape

- 15.38 As part of the submission the applicant has provided various verified views to illustrate the development's impact on the local townscape. This is particularly relevant for the proposed tower, as Policy D9 of the London Plan requires development proposals for tall buildings to address impacts in respect of the local townscape in terms of legibility, proportions and materiality. This is reaffirmed by the supporting text of Core Strategy Policy DH2.
- 15.39 On View 2 from the northern elbow of the dock, the proposed 12 storey block would raise above the canopy of the existing trees to the north of the site, marking the southern end of the dock. It is noted that the existing tall buildings at Elmley Street, 800 metres away from the site, would also be clearly visible in the background of this view. While being significantly taller than the surrounding fabric, the proposed tall building would not have a highly detrimental impact on this view, looking acceptably integrated in the designed frontage of buildings and their surroundings, in terms of its legible role as local landmark, its sympathetic architectural language and materiality.

- 15.40 On Views 4 from Camelot Close, the proposed lower buildings of Block B would create some mediation between the 12-storey building and the low-rise houses in the foreground of this view. The tall building would sit centrally on this view and reads as a focal point, framed by the existing trees on Camelot Close, far enough to not look too much engaged with the neighbouring houses. While some impact on this view is acknowledged in consideration of the low-mid-rise character of the surrounding area, this would be acceptably mitigated by the highest quality of materials and features to be achieved for this building. A similar level of impact is acknowledged on views 11 and 14 from other points of Camelot Close.
- 15.41 On view 5 from Carronade Place and view 6 from Broadwater Road, the low-mid-rise blocks of the scheme create a legible transition with the surrounding fabric and mediation with the 12-storey building.
- 15.42 On views 7 and 8 from Whinchat Road, the 12-storey building would raise above the roofs of the three storey houses on this street, reading as relatively close and engaged with them. This effect is only partially mitigated by its sympathetic materiality.
- 15.43 On view 10, looking south from the opposite side of the dock, the proposed 12-storey building does look somewhat squat, however, it is still considered to acceptably integrated within the designed frontage of buildings.
- 15.44 The proposal would raise in the background of view 12 from northern Pier Way. The 12-storey element of Block B and the seven-storey element of Block A would read as relatively distant and disengaged from the foreground of this view, creating a new, expressive architectural element in its skyline.
- 15.45 On the long view 19 from the junction of Argyll Road and Cadogan Road, the proposal is slightly visible behind the roof of the Grade II listed Royal Arsenal – Armstrong Gun Factory. The level of harm created to this heritage asset is considered to be low and limited to a very small portion of the roof of the listed building. This is further discussed in the heritage section below.
- 15.46 Overall, it is considered that the proposal would result in some visual harm to a limited number of views where it would raise behind and above the roofs of the surrounding low-rise fabric. Nevertheless, this harm would be offset by achieving the highest quality of materials, detailing and finishes at the post-approval stages.

Heritage

- 15.47 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that, in considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 15.48 Paragraph 199 of the NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Moreover, Paragraph 202 states that where a development proposal will lead 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.
- 15.49 Part C of London Plan Policy HCI requires new development affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 15.50 Core Strategy Policy DH(h) expects developments to pay special attention to preserving or enhancing the character or appearance of the Conservation Area, with the local scale, the established pattern of development and landscape, building form and materials all to be taken into account. Similarly, Policy DH(i) states that proposals which would detract from the setting and proportions of a Listed Building or group will be resisted.
- 15.51 The site itself does not hold any designated or non-designated heritage assets. The closest heritage asset within the vicinity of the site is the Grade II Listed lock and swing bridge at the end of the Broadwater Dock. The designation for this structure is as follows:

Lock of 1812-14 and swing bridge of C1876. Entrance lock built of brick with dressings and coping of Dundee stone; C20 riveted steel lock gates. Iron swing bridge to south west corner of lock. History: the Royal Arsenal Canal was built to allow supplies (especially timber) to be brought into arsenal and to protect the eastern boundary of the site. The swing bridge was built to serve a standard gauge line added in 1876 to connect the LCDR at Plumstead.

- 15.52 The proposed development would be some 238m away at the closest point, with the distance to the taller tower increased to 406m. Given these separation distances, coupled with the presence of several existing taller towers within the vicinity of the listed structure, it is not considered that the proposed development would result in any harm to the designated heritage asset.
- 15.53 As outlined in the townscape considerations above, the development would be slightly visible behind the roof of the Grade II listed Royal Arsenal Armstrong Gun Factory. The level of harm created to this heritage asset is considered to be less than substantial and Officers have therefore had regard to the public benefits the scheme would deliver, in accordance with the NPPF guidance set out above. To this end, it is considered that the high level of affordable housing which would be delivered, together with new public realm and pedestrian connections and the various financial contributions which would also be secured, outweigh this limited harm.
- 15.54 Overall, it is considered that the development would have an acceptable impact on local heritage assets, noting the public benefits which would be secured through the delivery of the scheme.

16 Open Space and Children's Play Space

- 16.1 Policy OSI of the Core Strategy (2014) states that existing public and private open space should be safeguarded, enhanced and benefit from improved access. The supporting text further states that open spaces are a recreational resource and provide opportunities for residents to participate in leisure activities as well as the opportunity to improve the health and well-being of residents. Policy G4 of the London Plan (2021) reinforces this and confirms development proposals should where possible create areas of publicly accessible open space, particularly in areas of deficiency.
- 16.2 All units across the site would have access to the proposed public amenity spaces located throughout the site. This would include the formation of a new "pocket park" to the southern corner of the site, which would feature children's play equipment. Whilst the pocket park would primarily be used by residents of the development, it could also be used by members of the wider public and has been positioned in this location for the purposes of fostering community cohesion between existing and future residents.
- 16.3 An additional community amenity space would be provided to the northern end of the site, again featuring equipped child play space. While this area would be publicly accessible, given its location at the end of the site, which is

essentially a large cul-de-sac, it is envisaged that this would be used primarily by residents. Nevertheless, the applicant has shown how the proposed development would integrate with a previously consented scheme to the north, with this area opened up to allow permeability between the two. The adjacent permission is no longer implementable, but gives an indication of how the two sites could be linked to foster community cohesion in the future.

- 16.4 Other smaller green spaces would be dispersed around the proposed development, as would numerous trees.
- 16.5 Policy S4 of the London Plan requires that new housing development ensure that children have access to good quality, well designed, secure and stimulating play opportunities. Policy H(e) of the Core Strategy requires that in residential developments that include over 50 units of family housing, suitably equipped and well-designed children’s play areas are required for different age groups. The required level of provision is calculated using the methodology set out in the Mayor of London’s Play and Informal Recreation SPG.
- 16.6 The Mayor’s Play and Informal Recreation SPG recommends 10sqm of play space per child. The requirements of children’s play space are divided into three categories. Space for the under 5s, described as doorstep play and generally considered as part of the plot; space for ages 5-11 and children 12 plus.
- 16.7 Based on the mix of units proposed the scheme would generate 188 children, which would necessitate the provision of 1888sqm of on-site playspace.
- 16.8 The proposed development would deliver the following on-site play provision:

Age Group	Play Space Policy Requirement (sqm)	Proposed Play Space Provision (sqm)
0-4	826sqm	830sqm
5-11	630sqm	668sqm
12+	433sqm	418sqm
Total	1,889sqm	1,916sqm

- 16.9 While it is noted that the proposed provision for the 12+ age group falls below policy requirement, this is considered to be a minor shortfall. Moreover, given the overall overprovision of play space proposed within the site, coupled with the fact that the site is within 4 minutes’ walk of

Broadwater Green (equipped) and 10 minutes' walk Gallion's Park (equipped), no objections are raised.

16.10 Play space would be distributed throughout the site and within podium amenity spaces. The proposed equipped space within the pocket park to the southern corner of the site would, due to its location, invite the use of the wider community which is welcomed. The applicant has provided indicative plans at this stage to demonstrate the types of equipment which would be incorporated, with the final details to be secured via condition.

17 Neighbouring Amenity

17.1 Policy DH(b) of the Core Strategy sets out that developments which result in 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 will be resisted.

Daylight and sunlight impact to neighbouring properties

17.2 The daylight/sunlight report submitted with the proposal has assessed the impacts of the development on neighbouring properties using the VSC (vertical sky component), NSL (daylight) and APSH (sunlight) tests set out within the BRE guidance. The assessment considered all of the closest neighbouring residential properties with windows overlooking the proposed development which included:

1. 97-150 Whinchat Road
2. 1-96 Whinchat Road
3. Hillwood House
4. 1 & 44-45 Carrondale Place
5. 16-20 Camelot Close
6. 24-26 Camelot Close
7. 27-29 Camelot Close
8. 34-47 Camelot Close
9. 48-50 Camelot Close

17.3 The scheme has been designed to respond to the neighbouring context by placing the taller elements of the development along the eastern boundary, with heights stepping down towards the closest neighbouring properties on Camelot Close. As a result, the effects to the vast majority of neighbouring windows and rooms fully accord with the BRE guidelines.

17.4 The Daylight and Sunlight Report provided a detailed commentary of the effects of the proposed development on the following neighbouring properties:

17 Camelot Close

17.5 This is a 2-storey end of terrace property is located to the south west corner of Camelot Close, bound by the development site to the south.

17.6 The report noted that the Vertical Sky Component (VSC) results for this property showed that the first level window retained VSC levels in accordance with the BRE guidelines at 0.8 times the former level. The ground level window experienced a marginal deviation below the BRE targets at 0.7 times its former level. Whilst the ground floor window experiences a minor adverse effect beyond the BRE target of 0.8, the retained absolute VSC level is very high at c.26% VSC, only marginally below the target 27% VSC. The limited daylight effect to this property is confirmed by the No Sky Line (NSL) results. Both the ground and first level room recorded no noticeable shift in daylight penetration to the room, retaining 0.9 times their former level.

17.7 The results from the APSH study show that the windows across the rear elevation of this property, significantly exceed the BRE criteria of 25% APSH with at least 5% during the winter months and thus fully meet the BRE recommendations for direct sunlight.

48 Camelot Close

17.8 This 2-storey dwelling adjoins the development site to the north east corner of Camelot Close.

17.9 There is good separation between the development and the rear elevation of this neighbouring property such that both the VSC and NSL results show there will be no material change in the daylight to these rear windows and rooms. All levels remain at or within 0.8 times the existing value and fully comply with the BRE targets.

17.10 In terms of total APSH, the report stated that the windows across the rear elevation of this property will retain excellent levels at 37% in excess of the BRE criteria of 25%.

17.11 In the winter months, the report noted that 1 ground level window would experience a degree of change below the BRE targets of 5% at 3% WPSH. This is a marginal deviation from the BRE guidelines that is somewhat driven by the relationship of this property being set back from the neighbour to the

south. This is illustrated by the neighbouring property at 46-47 Camelot Close retaining winter sunlight levels in excess of the BRE targets above 12% WPSH.

17.12 The report noted that the this 2% deviation from the BRE targets relating to low angle winter sunlight is considered minor and will not materially impact the use and amenity of the space.

17.13 Hillwood House

17.14 This is a 3-storey residential block is situated on Pier Way, to the south west of the development site.

17.15 The VSC results showed that all but 1 of the flank windows will retain 0.8 times their former level or achieve a VSC of 27% with the scheme in place such that they fully comply with the BRE guidelines. The 1 window falling below the targets is that at second level which is recessed beneath deep eaves.

17.16 The BRE guidelines recognise the limitations that balconies / overhangs have on daylight availability at neighbouring properties and as such flexibility should be applied to ensure that such features do not hamper development potential at sites. To show that it is the design of the neighbour rather than the scheme itself driving the reductions in daylight, BRE guidelines suggests that additional assessments are undertaken with the balcony / overhang removed.

17.17 The results show that with the overhang removed this room would comfortably exceed the targets for VSC.

17.18 With regards to the NSL, three kitchens experienced a shift in the No Sky-Line outside of the BRE targets but the main living rooms were unaffected. As galley style kitchens these are 'non-habitable' spaces and which the report considers the localised shift in daylight penetration not to have a material impact on the use / enjoyment of the space.

17.19 The report noted that whilst there are 6 windows within the southern elevation of this property, these face away from the site such that they are limited to oblique views of the scheme.

17.20 The results show that all south facing rooms are well in excess of 25% target for total annual sunlight levels and 5% for the winter months receiving at least 46% and 22% respectively.

1-96 Whinchat Road

- 17.21 This is a 4 to 5-storey block of flats located to the south of the site and comprises retail units at ground with residential flats at the upper levels.
- 17.22 The VSC results for the property show that all of the kitchens overlooking the site will experience a change below the BRE target level of 0.8 their former level. These are already constrained in their existing position due to their recessed position below the walkways.
- 17.23 The report noted that the affected kitchens are however just c.8m² in area and therefore considered 'non-habitable' when referring to the Mayor of London's housing design guidance. As the kitchens are too small to qualify as a habitable room under the guidance and the main living spaces facing away from the proposals will be completely unaffected, the effects are unlikely to affect the pattern of use or enjoyment of the property such that the impacts are not considered to result in an unacceptable levels of harm upon these residents.
- 17.24 The NSL results for the kitchens show that all of the rooms will experience comparable levels of daylight penetration within the room retaining 0.9 times the former level. These effects are not considered to be material under the BRE document and fully meet the guideline targets.
- 17.25 In addition, the report considered the VSC changes without the external overhangs in place to demonstrate that effects these balconies have on the daylight availability to the spaces. The results show that, were it not for the balconies, all of the rooms would satisfy the BRE targets.
- 17.26 In terms of direct sunlight, the windows within 1-96 Whinchat Road which look towards the proposals are not within 90 degrees of due south. As such they are therefore not relevant for sunlight assessment under the BRE criteria.

109 Whinchat Road

- 17.27 This is a 2-storey mid-terrace property located on the western side of Whinchat Road, to the east of the site.
- 17.28 The results of the VSC analysis show that two of the windows experience minor VSC reductions beyond the BRE targets to 0.7 times their former level. These isolated effects are exacerbated by the setback of the property when compared to the neighbour at 108 Whinchat Road.

- 17.29 Despite the slightly increased proportional reductions, the absolute retained VSC levels are good across the rear elevation at between 17% and 25%.
- 17.30 The good level of retained daylight is confirmed by the NSL results which shows no material change in the daylight penetration to the rooms when compared with the existing condition.
- 17.31 Overall, the report noted that the daylight effects to this property are isolated to minor changes in the sky views and retained daylight amenity will be in line with that typically accepted for a London location.
- 17.32 In terms of direct sunlight, the windows within 109 Whinchat Road which look towards the proposals are not within 90 degrees of due south. As such they are therefore not relevant for sunlight assessment under the BRE criteria.

115-118 Whinchat Road

- 17.33 115-118 Whinchat Road are 2-3 storey mid terraced dwellings situated approximately 39m to the east of the proposals, across the Broadwater Canal.
- 17.34 The results of the VSC assessment demonstrate that the majority of windows meet the BRE recommendations with 14 out of the 18 rear windows retaining at least 0.8 times its existing level. Whilst there are deviations from the targets, those across no.115 and 117 are considered to be only minor effects retaining 0.7 times the former value with absolute VSC levels between c.23%-25%. Such retained VSC levels are considered to exceed that typically accepted for urban developments in London.
- 17.35 The remaining window falling below the targets is located at the ground level of no.116 and is significantly overhung. The report noted that the porch feature above limits the availability of daylight to these windows in the existing condition and exacerbates the effects to this property.
- 17.36 When considering the VSC effects with the rear overhang removed, the report noted that the effects to this window fully meet the BRE guidelines with the proposal in place therefore demonstrating that the design feature is the driving factor rather than the scheme itself.
- 17.37 The NSL results show that the majority of rooms will retain daylight distribution levels within 0.8 times the former value and therefore will meet the BRE guidelines. A total of 4 rooms across no. 115 and 117-118 fall below the targets, but do so marginally with the retained levels within 0.7 times the existing levels. These are minor transgressions from the BRE guidelines given

that the daylight penetration across these rooms remains high, with c.70% of the room area maintaining sky visibility.

- 17.38 Whilst there is similarly 1 room experiencing daylight distribution effects beyond this, this is an isolated effect to the kitchen / diner at no.116 hampered by the rear overhanging porch. The report points out that from the results of the neighbours it is clear that the overhang results in disproportionate effects to this property.
- 17.39 In terms of direct sunlight, the windows within these properties which look towards the proposals are not within 90 degrees of due south. As such they are therefore not relevant for sunlight assessment under the BRE criteria.
- 17.40 The remaining units identified in section 17.2 were considered to accord with the BRE guidelines.
- 17.41 In conclusion, where deviations from the BRE recommendations do occur, these are considered to be minor shortfalls during limited times of the year which are unlikely to cause any detrimental impact to the amenities of neighbouring occupiers. In the majority of cases these shortfalls are caused due to the specific design constraints at neighbouring properties where windows are recessed below external overhangs. This is further exacerbated by the underdeveloped nature of the current site, which result in neighbouring properties receiving an unusually high levels of sunlight/daylight than what would ordinarily be experienced in an urban environment. Furthermore, the report also highlights that in almost all cases where shortfalls occur, the respective rooms which would be impacted would not be habitable rooms, such as kitchens and bathrooms, with the main living areas and bedrooms unaffected.

Overshadowing impact to neighbouring properties

- 17.42 An assessment of sunlight amenity (overshadowing) within neighbouring rear gardens was also undertaken. This considered the effects to the nearest neighbouring gardens at 16-27 Camelot Close adjoining the site, as these are orientated south towards the scheme and are most likely to be impacted, and utilised the 2-hour sun on ground/sunlight amenity test in line with the BRE guidelines.
- 17.43 The assessment demonstrated that all but 1 of the gardens would fully satisfy the BRE criteria for sunlight amenity with the scheme in place when tested on 21st March. The one rear garden which fell below the BRE target levels was 18 Camelot Close, which saw the existing levels of 50% 2hr₊ sunlight

availability in the existing condition reduced to 38% sunlit in the proposed scenario. This equates to 0.75 its former level.

17.44 This shortfall is considered to be a minor deviation from recommendations, which state that scheme should seek to retain 0.8 times existing levels. Moreover, a further assessment on 21st June showed there was no material change to the neighbouring property. Given the summer months are when gardens are most utilised, together with the fact that the shortfall is a minor deviation from BRE guidance, no objections are raised.

Outlook/Sense of Enclosure

17.45 As mentioned above, the layout and massing of the proposed development has been considered with the adjacent neighbours in mind. This has seen the incorporation of dwellings along the north western boundary to minimise the impact on neighbouring properties on Camelot Close, who's gardens would back onto those within the proposed development. Dwellings would be located some 18m away from the rear elevations of the proposed dwellings, which considering these would be limited to two storeys in height is unlikely to cause any undue loss of outlook or increased sense of enclosure.

17.46 The larger podium blocks have also been designed to minimise heights along their respective northern elevations, those closet to sensitive neighbouring uses on Camelot Close. This has seen these sections of the buildings limited to three storeys in height.

17.47 The properties on Camelot Close which would be closet to Block B would be some 13m away. However, whilst these distances are close, the orientation of the relevant neighbouring properties sees their side elevation facing towards the application site. Each side elevation of these properties feature a single window at first floor level, but given the location and proportions of these fixtures it is clear that they are either secondary windows or serve non-habitable spaces such as stairs/bathrooms. On this basis it is not considered that the proposed development would result in a detrimental harm to the amenities of the neighbouring occupiers.

17.48 The properties Camelot Close which would be closet to Block A would be Nos.16-20. No.16 would have their side elevations facing the site, with no windows within this. The garden of No.16 would also be some 20m away from the proposed three storey massing, which is not considered to be unreasonable and reflects similar arrangements between two storey dwellings and three storey, plus roof, flatted blocks within the area. Views past the block would also be possible from within the garden space. As such, the

development would not have any unacceptable overbearing impacts on the residents of this dwelling.

17.49 Nos. 17-20 Camelot Close would have rear elevations facing towards the application site, with the diagram below demonstrating the separation distances.

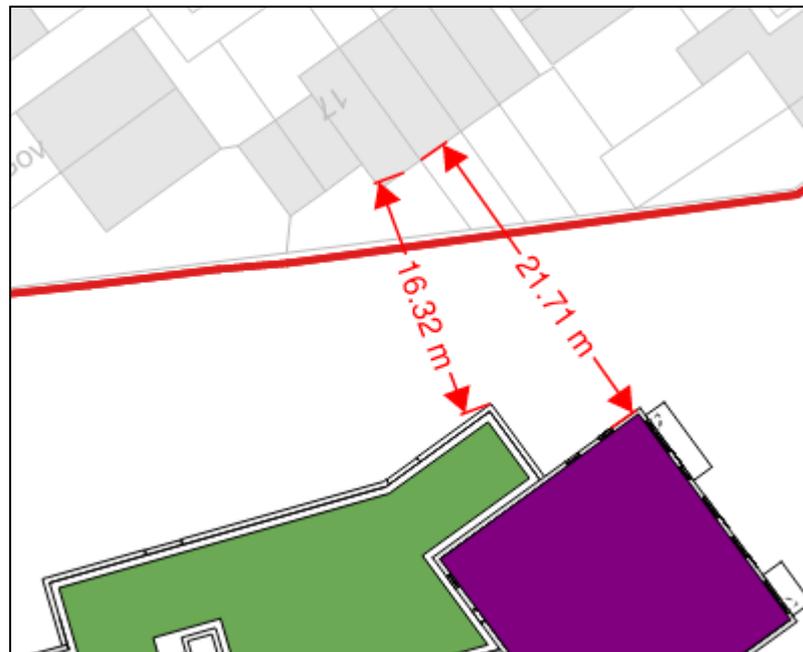


Figure 2: Camelot Close Separation Distances

17.50 The area shown above in green would be three storeys in height, while the purple would be four storeys. Nos.19 and 20 Camelot Close to the far right of No.17 would have views directly past the proposed development and would therefore not be impacted by any overbearing impacts or increased sense of enclosure. No.18 would be directly opposite the four-storey element at a distance of 21m, however, views past the development would still be possible. Given this, coupled with the +20m separation distance, it is not considered that the proposal would result in a significant loss of outlook or increased sense of enclosure to no. 18. No.17 would be closest to the proposed flatted block, with separation distances of between 16m-19m from the three-storey element and 21m-23m from the four storeys. Views past the development for No.17 would still be possible from both the ground and first floor but these would be limited. The boundary would also be treated with soft landscaping to further soften the appearance of the development, which would be in addition to the fairly extensive vegetation within the rear of the neighbouring property's garden. The arrangement would also not be dissimilar from arrangements within the area, where two storey dwellings back on to three storey, plus roof, flatted blocks at a distance of some 15.6m. Given the flat roof design of the proposed development, the resultant

arrangement would not be dissimilar to this. On this basis it is considered that the development would have an acceptable impact on the properties within Camelot Close.

17.51 Neighbouring properties to the west of the application site do not feature primary windows which would face the development. As such, they would experience no unacceptable overbearing impacts.

17.52 Neighbouring units to the south and east of the application site would all feature sufficient setbacks from the development to ensure there would be no overbearing impacts.

Privacy

17.53 The main potential impacts of the development in terms of privacy would be to neighbouring dwellings within Camelot Close, as these would be in closest proximity to the site. The neighbouring properties to the northern end of the application site would back on to the proposed two-storey dwellinghouses, with separation distances of some 16.3m from habitable windows. These are not considered to be unreasonable distances given the urban environment and are not considered to result in an unacceptable loss of privacy for neighbouring occupiers. It is noted that similar separation distances are experienced within Camelot Close itself and the surrounding area. The proposed balconies within Blocks C and D which would face towards the neighbouring properties would be some 41m, which is considered sufficient to safeguard privacy.

17.54 The northern elevation of Block B would face on to the side elevations of Nos.27 and 26 Camelot Close at a distance of 13.6m. While these properties do feature windows within these elevations, due to their size and location it is not considered that these are primary fixtures to any habitable rooms and this would not result in an unacceptable loss of privacy. Balconies within the northern elevation of Block B have also been positioned so as to limit overlooking into neighbouring properties on Camelot Close. Views from these fixtures would be largely limited to the side elevations of Nos.26 & 27, which as outlined above feature windows which are considered to serve non-habitable rooms/spaces. Some views of the rear elevations of Nos.27 and 28 would be possible from two proposed balconies within Block B, but these would be at an acute angle, thereby restricting direct and obtrusive views into the neighbouring dwellings. The two balconies in question would also see overlooking increased to the rear gardens of Nos.27 and 28, at distances of 16m and 20m respectively, and due to the orientations of the balconies, privacy screens would not be a suitable solution in this instance. While these distances are close, especially with regard to No.27, they would be somewhat

similar to a handful other arrangements within Camelot Close where first floor windows directly overlook neighbouring gardens at a distance of some 7m-15m. Given this, coupled with the fact that only two such balconies within the development would be within such distances without privacy screens, on balance no objection is raised.

- 17.55 In respect of Block A, separation distances between proposed and existing habitable windows would be a minimum of 22m. As outlined previously, these distances are considered acceptable within the context of the area and it is not considered that this would result in a harmful loss of privacy for existing residents. Views from proposed balconies onto the rear elevations of Nos. 25 and 26 Camelot Close would be possible. Two balconies would see separation distances of some 22.5m, with a further two at 27.5m. With regard to the latter, it is considered that at 27m the separation distance would be sufficient to ensure no detrimental loss of privacy for the neighbouring occupiers. The two balconies with shorter separation distances of 22.5m would not be directly opposite either of the properties on Camelot Close, thereby reducing overlooking into the rear windows to an acute angle. On balance this is considered acceptable. Privacy screens would be utilised to minimise impacts on Nos. 17-20, with details of these to be secured by condition. View onto the rear gardens of Nos. 15 and 16 Camelot Close would be possible from two balconies at a distance of 23m, however, this is not considered to result in a detrimental harm to privacy. Views onto the rear elevations of these properties from the balconies in question would be at an angle, thereby preserving the internal privacy of the occupiers.
- 17.56 As outlined in the Outlook/Sense of Enclosure considerations above, the side elevations of properties on the western side of Pier way do not feature primary windows serving habitable rooms. As a result, the proposed window and balcony arrangements would have limited impact on the internal privacy of neighbouring occupiers. Some views into the rear gardens would be possible, but as these would be on the opposite side of the street at some 22m-25m at the closest points, it is not considered that this would result in an unacceptable loss of privacy to these spaces.
- 17.57 Windows within School House to the south which face towards the site are believed to serve non-habitable spaces such as bathrooms and kitchens, thereby mitigating against an unacceptable loss of privacy. In any event, separation distances would in excess of 35m, which is considered sufficient to safeguard the amenities of neighbouring occupiers.
- 17.58 Properties to the eastern side of the Broadwater Dock would be at least 40m away, which again is considered to be a sufficient distance to ensure there

would be no unacceptable loss of privacy from either windows or balconies from the proposed development.

18 Wind and Microclimate

- 18.1 There are no national planning policies directly relating to wind microclimate issues. However, the National Planning Policy Framework (updated in June 2021) emphasises the benefits of a high-quality built environment. An example of this is set out in paragraph 130, which states that developments should establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- 18.2 The National Design Guide (2021) forms part of the associated planning practice guidance. Within this guide, the section Built Form B2 'Appropriate building types and forms' states that proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character.
- 18.3 London Plan Policy D3 seeks to optimise site capacity through the design-led approach, with the supporting text setting out that buildings should be of high quality and enhance, activate and appropriately frame the public realm. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area. Particular attention should be paid to the design of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and location of entrances. Creating a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation is important.
- 18.4 Policy D8 of the London Plan (Public Realm) goes on to state that development plans and development proposals should consider the local microclimate created by buildings and ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.
- 18.5 London Plan Policy D9 states that in respect of development proposals for tall buildings, impacts relating to wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be

carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

- 18.6 The applicant has submitted a Wind Microclimate study prepared by Urban Microclimate Ltd. and is dated May 2021. This comprises a desk study to assess the likely impact of the proposed Gallions View development on pedestrian level wind conditions in and around the site. The assessment considers the proposed development massing and exposure in conjunction with long-term wind climate statistics applicable to the site and provides a review of the likely suitability of wind conditions based on the industry standard Lawson criteria for pedestrian comfort and safety.
- 18.7 The proposed development includes two blocks which, whilst relatively modest in scale, do represent significant structures with regards to potential wind effects. However, the lower building heights along the southwest edge of the site, stepping up in height towards the centre of the site, is expected to help encourage prevailing south-westerly winds to pass up and over the development. The development also benefits from significant landscaping proposals which were purposely developed to help enhance wind conditions across the site and provide localised shelter to key amenity spaces.
- 18.8 As a result, the proposed development is not expected to have any significant impact on pedestrian level wind conditions with regards to pedestrian safety, and conditions in and around the site are expected to rate as safe for all users.
- 18.9 In terms of pedestrian comfort, with respect to wind force, thoroughfares within and alongside the site are expected to be suitable for pedestrian access to, and passage through or past, the proposed development. Moreover, the main entrances to the proposed development are expected to enjoy suitable conditions for pedestrian travel.
- 18.10 Ground and podium level recreational spaces are generally expected to enjoy suitable conditions for planned activities. However, a few small areas, such as the 'Story Telling Zone' and corner private spaces have been identified as potentially benefiting from enhancement through further development of soft landscaping proposals during detailed design stages. A requirement will therefore be attached to the associated landscaping condition.
- 18.11 With development of appropriate landscaping, the report concludes that it is expected that acceptable conditions for proposed recreational uses of the Core B3 roof terrace can also be achieved during the detailed design stages.

18.12 The proposed development is not expected to have any significant impact on the pedestrian level wind conditions within the surrounding area, which are expected to remain suitable for existing uses.

19 Transport, Access, Servicing and Parking

19.1 London Plan Policy T1 states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Policy T2 further sets out that development proposals should:

- 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance
- 2) reduce the dominance of vehicles on London's streets whether stationary or moving
- 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

19.2 London Plan Policy T4 requires developments to reflect and be integrated with current and planned transport access, capacity and connectivity. It further outlines that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified. Development proposals should not increase road danger. Additionally, Policy T5 of the London Plan (2021) states that development schemes should help remove barriers to cycling and create a healthy environment in which people choose to cycle.

19.3 Policy T6 of the London Plan confirms car parking is restricted in line with levels of existing and future public transport accessibility and connectivity. The maximum car parking standards set out in Policy T6.1 should be applied to this residential scheme. A site in this location should be car free as indicated in Table 10.3 of the policy. Part G of Policy T6.1 confirms that as a minimum any proposal should ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset.

19.4 Core Strategy Policy IM4 notes that developments should prioritise the needs of pedestrians, disabled users and cyclists over car users, stating that developments should not go above the requirements set out in the London Plan. Policy IM(c) of the Core Strategy sets out the requirements for parking provision.

- 19.5 PTAL (public transport accessibility level) is measured on a scale of 0-6b, with 6b being the most accessible. The application site has poor access to public transport, with half of it falling in PTAL 2 and the other half in 1b. Public transport is limited to two bus stops (opposite sides) a short distance to the south-west of the site. Bus Nos. 244 and 380 operate along this route and provide services terminating at Queen Elizabeth Hospital, Lewisham Shopping Centre, Abbey Wood and Belmarsh. The Thames Path and associated cycle lane are located 272m to the north and can be accessed via an existing cycle lane which runs along the western side of Pier Way. The nearest rail station is Plumstead Station to the south, which is approximately a 13-minute walk. Woolwich Arsenal Station and the upcoming Woolwich Crossrail Station are both within 1 mile of the site and are approximately 18 and 15-minute walks respectively.
- 19.6 The immediate surrounding road network is largely residential in nature, with traffic calming measures featuring along Pier Way. No controlled parking zones are in place.

Pedestrian and Vehicular Access

- 19.7 The current proposal would see the existing access and egress point to the north-western corner of the site retained. This followed feedback from the Council's Highways team at pre-applications stage where it was confirmed that relocating the road would not be advisable due to internal access road safety concerns. The internal access road layout would be altered slightly, pulling it back from the western elevation to the north of the site to allow the construction of the proposed dwellinghouses. RBG Highways Officers have recommended that traffic calming measures are installed along the access road to manage driving speeds and a condition will be added to this effect. RBG Highways have also advised that the road is not suitable for adoption, so it will be the developer's responsibility to manage.

Parking

- 19.8 Parking is proposed at a ratio of 0.39, which equates to 129 on-site parking spaces. This would usually be within the maximum thresholds set out in the London Plan, which states that a parking ratio of up to 0.5 is acceptable for sites with a PTAL of 2 and up 0.75 for those with a PTAL of 0-1. However in this instance, the site is located within the Thamesmead Opportunity Area (OA). The London Plan specifies that developments in inner London OA's should be car free and TfL and the GLA have therefore raised objection to the proposed parking provision.

- 19.9 While Officers acknowledge the concerns raised by TfL and the GLA, regard is also given to the potential impacts of the development should it be delivered as car free. As previously mentioned, the surrounding roads are not subject to parking restrictions and RBG Highways Officers have confirmed that parking on street is already at a premium. On this basis, if the development featured no on-site parking the surround roads would most likely be flooded with cars, which would not only increase parking stress in the area, but would also have a harmful impact on traffic and congestion as residents would be forced to travel further and longer to find a space.
- 19.10 TfL have suggested that parking restrictions are imposed on the surrounding road network to enable the delivery of a car free scheme, however, the Council is unable to unilaterally impose such restriction, rather it would be subject to public consultation of affected properties. In this regard, the developer has agreed to provide a financial contribution of £60,000 to fund such a consultation. If well received by residents and a controlled parking zone (CPZ) was introduced, it would mean that future developments in the area would be able to be secured as car free. Moreover, the developer has also agreed as part of the associated S106 agreement that future occupiers of the development would not be eligible to apply for parking permits should a CPZ be introduced in the future.
- 19.11 The developer has also sought to mitigate the impact of the proposed parking provision. In the first instance they have proposed to incorporate 40% of spaces with active electric charging points, which is double the 20% requirement specified by the London Plan. All remaining spaces would be provided with passive provision to allow easy conversion to active provision in the future, in accordance with London Plan policy. The developer has also agreed to a financial contribution of £270,000 to improve existing public transport capacity in the area, which the GLA and TfL have confirmed would fund an additional bus service during peak periods to help offset the impact of the development.
- 19.12 Given the site's close proximity to the Thames Path cycleway, it is envisaged that residents of the development would likely utilise this for commuting links into Woolwich, especially once the Crossrail station is opened. In light of this, a financial contribution of £40,000 has been agreed to improve the existing cycle path along Pier Way which links into the Thames Path cycleway. The developer has also incorporated a cycle lane within their site to further incentivise active travel.
- 19.13 A car club would be established on site, with every resident in the development provided with five years free membership. This would also have

positive impacts for the wider area, as the services would be available to all residents within the area and would promote more sustainable car sharing.

- 19.14 Given the above, it is considered that the proposed parking provision can be supported.
- 19.15 London Plan Policy T6.1 outlines that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset, with capacity for an additional seven per cent of dwellings should future demand arise. Following the receipt of revised details, the applicant has confirmed that 10 blue badge spaces would be delivered from the outset as part of the development, which would equate to 3% provision. They have also confirmed that there is capacity for a further 7%, with details of this to be secured as part of the parking management condition.

Servicing and Delivery

- 19.16 A Delivery and Servicing Plan (DSP) has been prepared alongside the Transport Assessment (TA) as part of the overall planning application and forms a logistics management tool which is aimed at reducing the impact of delivery and servicing at the site. The DSP sets out in detail the proposed delivery and servicing vehicle arrangements, measures of the DSP as well as how the DSP will be managed and monitored. Given some concerns have been raised by TfL in regard to delivery logistics, a condition will be attached to secure additional information.

Cycle Parking

- 19.17 The development will have 615 long stay cycle spaces and nine short stay cycle spaces, which will be distributed across the site in a number of secure stores serving each of the main areas of the development. Final details of the proposed provision will be secured by condition.

Impact on Public Transport

- 19.18 The development will have 615 long stay cycle spaces and nine short stay cycle spaces, which will be distributed across the site in a number of secure stores serving each of the main areas of the development. Final details of the proposed provision will be secured by condition.

Impact on Public Transport

- 19.19 The Transport Assessment (TA) includes an assessment of the impact on public transport.

Rail:

- 19.20 The TA identifies the nearest National Rail stations as Plumstead Station and Woolwich Arsenal Station which are 950m and 1400m from the site respectively. In the future, Woolwich Station for the Elizabeth Line (Crossrail) will also be accessible from the Site (1200m); once operational it will provide links to Abbey Wood, Heathrow, Reading, London and Shenfield.
- 19.21 The proposed development is forecast to result in 97 two-way rail trips in the AM peak and 77 two-way rail trips in the PM peak.
- 19.22 The TA concluded that the train services within the vicinity of the development are available at regular intervals during the peak hours and therefore the proposed development is expected to have negligible impact on the rail services.

Bus Services:

- 19.23 The site is currently served by the 244 and 380 bus routes at Broadwater Road and Whinchat Road which are 190m and 260m south of the site. Both the 244 and 380 bus routes offer frequent services all day.
- 19.24 Further buses are available on Pettman Crescent and Plumstead Bus Garage on Plumstead Road; this includes the 96, 99, 177, 180, 301, 422, 469, 472 and the NI bus services.
- 19.25 The proposed development is forecast to result in 58 two-way bus trips in the AM peak and 46 two-way bus trips in the PM peak.
- 19.26 The TA concluded that the bus services within the vicinity of the development are available at regular intervals during the peak hours and therefore the proposed development is expected to have negligible impact on the bus services.
- 19.27 Notwithstanding the above, TfL has requested a contribution of £270,000 toward bus service improvements, associated with routes 380 and 244 as both are currently operating at full capacity. This has been agreed by the applicant and will be secured in the S106 legal agreement.

Impact on Highway Network:

- 19.28 The proposed development is forecast to result in 18 two-way vehicle trips in the AM peak and 15 two-way vehicle trips in the PM peak utilising the A206 Pettman Crescent Gyratory.

19.29 It is estimated that most trips will be via public transport and given the relatively low number of vehicle movements expected, the development is therefore unlikely to have any significant effect on traffic and could be accommodated on the highway network.

Transport Conditions and S106 obligations:

19.30 Various conditions and S106 obligations are proposed to be secured. These include:

Conditions:

- Demolition/Construction Travel Plan
- Demolition/Construction Management Plan
- Traffic Calming Measures
- Blue Badge Parking Bays
- Car Park Management Plan
- Delivery and Servicing Plan
- Details of Cycle Parking
- Details of Works to adopted Highways
- Car Parking
- Electric Charging Vehicle Points
- Details of On-Street Parking

S106 Obligations:

- Bus Service Contribution of £270,000
- Car Club - 5 years free membership
- Consultation/Implementation of a CPZ
- Highways Works
- Cycle Training Contribution
- Public Realm Improvement
- Travel Plan
- Prevention of Occupiers being entitled Parking Permit

20 Sustainability and Energy

20.1 The National Planning Policy Framework (2021) sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The NPPF also notes

that planning supports the delivery of renewable and low carbon energy and associated infrastructure.

20.2 The London Plan (2021) policy SI 2, Part A, states major development should be net zero carbon, which means reducing greenhouse emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

1. Be lean: use less energy and manage demand during operation.
2. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
3. Be green: maximise opportunities for renewable energy by producing, storing, and using renewable energy on-site.

20.3 Part C, of Policy SI2 of the London Plan (2021) confirms a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

- 1) Through a cash in-lieu contribution to the borough's carbon offset fund; or
- 2) Off-site provided that an alternative proposal is identified and delivery is certain.

20.4 Policy SI 4 of the London Plan (2021), stated that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

1. Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure.
2. Minimise internal heat generation through energy efficient design.
3. Manage the heat within the building through exposed internal thermal mass and high ceilings.
4. Provide passive ventilation.
5. Provide mechanical ventilation.
6. Provide active cooling systems

20.5 Policy SI 5 of the London Plan (2021) highlights development proposals should:

1. Through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations

- (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
2. Achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development)
 3. Incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise futureproofing.
 4. Seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided.

Compliant Part L 2013 Base Case

- 20.6 The compliant regulated Part L 2013 carbon dioxide emissions have been calculated to be 353.6 (SAP10) tonnes and 399.3 (SAP2012) tonnes CO₂ per year.

Be Lean

- 20.7 A range of energy efficiency measures such as improved fabric specification and air permeability, 100% energy efficiency, Mechanical Ventilation with heat recovery (MVHR) in 120 units facing Piers Way in Blocks A and B and Mechanical Extract Ventilation (MEV) in all other units are proposed for the apartments and houses that exceed the minimum requirements of the BR Part L 2013.
- 20.8 A reduction of 15% is predicted in the space heating and hot water demand.
- 20.9 An improvement of 21.6% of the Dwellings Fabric Energy Efficiency over the Target Fabric Energy Efficiency is proposed.
- 20.10 Appendix 10 of energy report Rev B demonstrates the psi values as these have been calculated for the proposed development. These show an improvement when compared to the SAP default values. Whilst this is welcomed, SAP Thermal Bridging reports have not been provided as requested and therefore this information will be requested through the energy condition.
- 20.11 In addition, measures to reduce the unregulated energy and associated emissions have been demonstrated within the energy report. In particular, Section 8 of the Energy Report Rev B states that applicant commits in reducing unregulated energy consumption by implementing appliances with A rating and B rating for washer dryers where possible, smart meters and EU Energy Efficiency Labelling Scheme guidance to all occupants.

- 20.12 These measures predict a reduction in regulated CO₂ emissions of 14% (equal to 50.6 tCO₂/year, SAPI0) and 12% (equal to 48.6 tCO₂/year, SAP2012) for the residential element beyond the compliant Part L2A 2013 base case.
- 20.13 Whilst the energy report demonstrates that the CO₂ savings under the Be Lean stage exceed the minimum 10% target required in line with SI2 policy, the applicant has been strongly encouraged to improve the fabric specification especially for the walls on the apartments and the roof and identify measures to reduce the auxiliary energy usage as based on the GLA carbon calculation spreadsheet an increase of 53% compared to the baseline is observed.
- Be Clean*
- 20.14 In line with the report, an investigation into existing or planned DHNs in the vicinity with the proposed site was carried out via the London Heat Map and UK CHP Development Map with the Royal Arsenal (RAR) Energy Centre (EC) being the closest identified.
- 20.15 Evidence of correspondence with the RAR EC has been provided confirming that the EC does not have extra capacity to serve the proposed development which makes connection currently unfeasible. The applicant commits, however, to connect to any future network when it becomes available by proposing a centralised heating system.
- 20.16 Appendix 8 of energy report Rev B provides indicative drawings showing the heat pipework and the plant room configuration. No details on the heat distribution pipework, thermal stores, future single point of connection have been provided. Detailed and readable drawings will be required through a condition.
- 20.17 In addition, Section 7.1 of the updated energy report indicates that the centralised heating system will operate in 65 degrees flow and 28-35 degrees return with site wide primary and secondary heat losses of 4.83% in line with CIBSE CPI. Detailed information will be required through a condition.
- 20.18 The applicant should become aware that the Council is undertaking a detailed decentralised energy techno-economic feasibility (DE TEF) study to explore if a low carbon heat network can be developed to link all areas with anchor loads across Greenwich Riverside via Woolwich Town Centre extending from Thamesmead/Abbey Wood to Greenwich West and East areas and Woolwich is one of the cluster areas investigated. Localised solutions for the different areas with anchor loads are also being investigated as part of the

study until connection to the transmission pipeline is available. Investigation of connection to an offsite heat network will be secured in the legal agreement. The requirement to connect to an offsite heat network will be secured in the legal agreement.

20.19 No further CO₂ emission savings have been achieved at the Be Clean stage of the energy hierarchy.

Be Green

20.20 A number of renewable technologies has been investigated with ASHPs and solar PV technologies found to be the most feasible for the development.

20.21 In line with the report, the centralised heating system is comprised of ASHPs with 290% efficiency (SCoP of 2.9) to cover 70% of the space heating and hot water demand and top up gas boilers to provide the remaining 30%.

20.22 In addition, an increase in the solar PV area is proposed from 100kWp /~800m² to 261.75kWp/ ~2000m². A revised indicative roof plan layout has been provided showing potential areas of PV of some of the blocks. The PV is proposed to be split as follows:

- a) Block A 343no 375W panels – 128.625kW
- b) Block B 211no 375W panels – 79.125kW
- c) Block C 72no 375W panels – 27kW
- d) Block D 72no 375W panels – 27kW

20.23 In line with Section 7.1, the PV will supplement the electricity required by ASHP.

20.24 In terms of maintenance of the proposed technologies, it has been assumed that the solar PV will require minimal maintenance with annual cleaning as well as 5-yearly inspections of panels and inverters. An annual maintenance regime is proposed for the ASHPs and gas boilers. Relevant operational details for the ASHPs have not been provided, so this information will be conditioned.

20.25 The proposed low carbon energy technologies predict a reduction in regulated CO₂ emissions of 55%, equal to 166.9 tCO₂/year (SAP10) and 41%, equal to 144.8 tCO₂/year (SAP2012), beyond the Be Lean case of the Energy Hierarchy.

20.26 In line with energy report Rev B, it has been calculated that the low carbon energy technologies proposed are predicted to meet 14.74% of regulated

energy demand, which equates to 398,117kWh per year of a total energy demand of 1,350,896kWh.

20.27 The following information remains outstanding and will be required to be submitted through condition:

- a) Further information on the heat pumps should be provided including:
 - i. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
 - ii. types of refrigerants proposed for the technology and heat network, efficiencies of systems, refrigerant leak detector and refrigerants' Global Warming Potential.
 - iii. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
- b) Technical details for the solar PV should be also provided
 - i. An estimate of the electricity that the photovoltaic modules will generate including the assumptions for the calculations.
 - ii. The Percentage of Electricity Generated by the solar PV against overall electricity demand (%).
- c) Whilst the applicant seems to have maximised the CO₂ emission savings through the incorporation of solar PV throughout the development, they should especially investigate installing PV panels on the biodiverse roofs.
- d) A roof plan showing the location of the PV panels, biodiverse roofs and plant allocated space should be provided.

Overheating and Cooling

20.28 A number of additional measures than those stated above are proposed to reduce the risk of overheating in a selection of units including lower, mid and top floors, with large glazing areas, with less shading, large sun facing windows, single aspect, limited opening windows and communal corridors including fully openable windows, solar control glazing with windows g-value

of 0.5, external shading in the form of balconies, overhangs and recessed windows and internal shading in the form of blinds and either high level dumpers or via mechanical means for the communal corridors.

20.29 The results showed that all habitable spaces and communal corridors tested under CIBSE TM59 criteria (a) and (b) under the 2020 weather file, high emissions, 50% percentile scenario pass the criteria.

20.30 The following information remains outstanding and will be required to be submitted through condition:

- a. Results without the internal blinds should be also provided in line with CIBSE TM59 and GLA's energy assessment guidance documents.
- b. Consideration of thermally insulated pipework and ductwork and minimisation of horizontal pipework to assist with the risk of overheating should be explored.
- c. Results under the more extreme weather files including DSY2 and DSY3 should be also provided to demonstrate that compliance has been maximised.
- d. Although the more extreme weather scenarios DSY2 and DSY3 may not be compulsory to demonstrate a pass, the applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans, and they should commit to providing guidance to residents on reducing the overheating risk in their home in line with the cooling hierarchy.

Cumulative Carbon Savings & Carbon Offset

20.31 The energy efficiency measures, centralised ASHPs and 261.75 kWp solar PV panel predict an overall reduction in regulated CO₂ emissions of 62%, equal to 218 tCO₂/year (SAP10) and 48%, equal to 193.4 tCO₂/year (SAP2012) beyond the compliant Part L2A 2013 base case.

20.32 The development does not meet the zero-carbon target and proposes to address the remaining annual carbon shortfall of 136.1 tonnes CO₂ to 100% CO₂ reduction through a carbon offsetting contribution which based on 30 years at the current adopted price equates to £387,907. The carbon offsetting contribution will be secured in the legal agreement.

20.33 The development has generally demonstrated compliance with the London Plan 2021 and Local Plan policies. There are however a number of areas

where information has not been found sufficient and appropriate conditions are proposed to ensure that this information will be submitted at relevant stages of the development.

Whole Life-Cycle Carbon Assessment

- 20.34 The Life Cycle Carbon Assessment (LCCA) has been submitted in line with the guidance outlined in the GLA Whole Life-Cycle Carbon Assessments guidance document. The assessment follows the guidance for whole life carbon assessments outlined in EN 15978:2011 and the BREEAM UK tool.
- 20.35 The LCCA demonstrates the estimated WLC Emissions for lifecycle modules A, B, C (excluding B6 and B7) and D, benchmarks and aspirational benchmarks. In particular, the following WLC emissions have been estimated for
- a) lifecycle module A1 - A5: 844.956 kgCO₂e/m² compared to WLC benchmark of 750-850
 - b) lifecycle module B-C: 327 kgCO₂e/m² compared to WLC benchmark of 300-400
- 20.36 The development is currently just within the A1-A5 benchmark and within the B-C benchmarks. Opportunities to improve the concrete carbon emissions will be investigated further as the project design will progress. However, it is noted that the main constraint is the ground conditions and load of the building which requires piled foundations made of reinforced concrete.
- 20.37 Whilst the WLC emissions for the proposed building have been demonstrated to be generally within the GLA WLC benchmarks, the applicant proposes a number of actions to reduce whole life-cycle carbon emissions and emission reductions including
- a) Pre-demolition audits to determine qualities of existing materials and their potential for repurposing or recycling
 - b) water efficient appliances and fittings and water leak detection system
 - c) energy strategy following the Mayor's Energy Hierarchy
 - d) dual aspect units with cross ventilation and reduced cooling demands
 - e) selection of low embodied carbon materials
 - f) materials with Environment Product Declarations (EPDs)
 - g) use of more standardised materials that requires little to no maintenance over its life and can often be reclaimed at the end of the building's life
 - h) green roofs and soft landscaping and planting will be maximised

- i) a comprehensive maintenance and repair schedule will be developed to ensure longevity of materials
- j) Site Waste Management Plan to reduce and manage waste
- k) A full Circular Economy Statement will be developed

20.38 The applicant has been advised that the following should be considered for the next stage of the WLC submission:

- a) consideration of concrete mix with higher 55% recycled cement replacement content
- b) investigation of recycled aggregates and demolition waste in new on-site concrete
- c) minimisation of the volume of concrete within the building, by ensuring a highly efficient structural design is conducted
- d) use of local suppliers where possible to reduce transportation emissions
- e) consideration of demolition and deconstruction of the development at the design stage
- f) The refrigerant proposed as part of the services strategy should be also quantified and measures to minimise the in-use emissions of these should be reported

20.39 The WLC will also have to be submitted at detailed planning stage and post construction stage. This requirement will be conditioned.

Be Seen Energy Monitoring

20.40 The applicant should review the 'Be seen' energy monitoring guidance to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy. A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through suitable legal wording or conditioned. The first submission of the planning stage data should be provided to the GLA through the be seen reporting spreadsheet within four weeks of planning approval. This requirement will be conditioned.

20.41 Smart meters and energy display devices are proposed to allow residents to manage the occupants' energy use.

20.42 In addition, the applicant is committed in ensuring occupants are protected from high prices limiting the costs to no more than 6p/kWh through provision of transparent billing mechanisms. It is also noted that future occupants will have the choice for meters and heat tariffs at no extra cost

with the applicant currently looking to propose prepayment meters to added occupant control.

RBG Renewable/Low Carbon Energy Monitoring

- 20.43 For any renewable/low carbon technology proposed, compliance with London Plan (2021) Policy SI2 (Minimising greenhouse gas emissions) and RBG Core Strategy policy EI (Carbon Emissions) is required to be demonstrated through a monitoring agreement that will be signed between the Local Authority and the applicant to monitor the effectiveness of the renewable energy technology. The agreement has to be signed at prior to first occupation to comply with the prevailing monitoring requirements which will include the installation of an on-site automatic meter reading (AMR) device and provision of monitoring data to the Council's Sustainability Team for a minimum period of 5 years. This requirement will be secured in the legal agreement.

Sustainable Design and Construction Standards

- 20.44 With regards to the sustainability measures proposed, the development proposes to incorporate environmentally friendly and responsibly sourced materials, low embodied carbon materials, water efficient measures to achieve a internal water consumption of 95.5l/p/s which improves on the maximum 105l/p/d target and water meters, reduction of surface water run-off through the use of sustainable drainage, provide attenuation through permeable paving of 183.15m³, crate attenuation to provide 748m³ and blue roofs to provide 352m³, biodiversity enhancement through incorporating of soft landscaping, planting, public and private gardens which will also contribute to the reduction of surface water run-off, bird and bat boxes and trees, reduction of noise, light and air pollution during construction and operation, waste management plan during construction and operation, registration with Considerate Constructors Scheme.
- 20.45 The following information remains outstanding and will therefore be required through a condition:
- a. All insulation used within the development should have a low GWP and paints, sealants and other finishes should be of low or zero Volatile Organic Compounds (VOCs).
 - b. Details of the refrigerant, leakage and refrigerant's GWP of the ASHPs should be provided and commitment to use the lowest GWP should be explored.
 - c. Any gas boilers proposed should be of ultra-low NO_x emissions. Details should be provided.

d. Water Efficiency Calculations should be provided.

21 Ecology and Biodiversity

- 21.1 Policy G6 (Biodiversity and access to nature) of the London Plan (2021) requires that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Policy OS4 of the Core Strategy requires that new development enhance Royal Greenwich's rich biodiversity and geo-diversity. Policy OS(f) expands on the aspects that must be taken into account when assessing ecological factors.
- 21.2 Policy G5 of the London Plan (2021) confirms proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. This is reinforced by Policy E(f) of the Core Strategy.
- 21.3 Policy G7 of the London Plan (2021) confirms new developments should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 21.4 Policy OS(f) of the RBG Core Strategy (2014) refers to development proposals to be expected to take account of ecological factors, which includes the retention of trees.
- 21.5 An Ecological Appraisal (EA) and Extended Phase I Habitat Survey have been carried out for the land east of Pier Way to assess the baseline ecological conditions of the site and its potential to support protected species and species of conservation concern.
- 21.6 With regards to the EA, the report demonstrates that the site consists mainly of buildings, maintained amenity planting and ornamental planting and invasive species. The site has been found of low ecological value.
- 21.7 The site is not subject to any statutory nature conservation designations, nor is any such designation located within 2km of the site. Maryon Wilson & Gilbert's Pit (LNR) is the closest designated location, some 2.7km west of the site, and the nearest non-statutory designation is the River Thames (SMINC)

which is located 0.2km north of the site. Due to the location and distance of the proposed development from any statutory or non-statutory designated sites, it is considered unlikely that the development will have any direct, indirect or in combination adverse effect upon these sites.

- 21.8 No evidence of priority habitats, ancient woodland or notable trees have been identified within or adjacent to the site.
- 21.9 The desk-based study recorded a number of habitat species of conservation concern including Stinking Goosefoot *Chenopodium vulvaria* and Sea Barley *Hordeum marinum*. No evidence of Priority Habitats were recorded during the site survey.
- 21.10 The amenity grassland areas recorded within the site comprise generally of close-mown, with common herb species including Creeping Cinquefoil *Potentilla reptans*, Hoary Plantain *Plantago media*, Mouse-ear Hawkweed *Pilosella officinarum*, Cat's-ear *Hypochaeris radicata* and Yarrow *Achillea millefolium*. The small areas of ornamental planting recorded onsite included a number of species of urban setting such as Butterfly Bush *Buddleja davidii*, Dogwoods *Cornus sp.*, Lavander *Lavandula sp.*, Fuschia *sp.* etc while small number of existing small ornamental trees are present, including Sycamore *Acer pseudoplatanus*, Cedar *Cedrus sp.*, Tree *Cotoneaster Cotoneaster sp.*. Weed species were also recorded onsite.
- 21.11 A single record of hedgehog located approximately 0.8km south east of the site and a number of records of water vole closest located approximately 0.35km east of the site were recorded from the desk-based study.
- 21.12 No evidence of badgers, hedgehogs and other common mammals, GCN, reptiles, amphibians and suitable habitats to support these species have been identified during the site survey.
- 21.13 Evidence of invasive Butterfly Bush *Buddleja davidii*, apanese Knotweed *Fallopia japonia*, along with Wall *Cotoneaster horizontalis* and Virginia Creeper *Parthenocissus quinquefolia* were observed within the site and measures should be taken to remove these plants from site following best practice guidance (DEFRA).
- 21.14 Evidence of a range of notable and other bird species were recorded during the desk-based study. The site survey recorded several bird species including Magpie *Pica pica*, Woodpigeon *Columba pallambus* and Feral Pigeon *Columba livia* and nesting bird habitat features mainly to the denser ornamental shrubs and planting within the site, minor ledges and buildings. Mitigation measures

are proposed such as any tree and shrub clearance should be taken outside of the bird breeding season.

- 21.15 The desk-based study identified a range of bat species including noctule, common/ soprano, and pipistrelle within 1km of the site. The small number of trees present were not recorded to support roosting bat features. A Phase 2 bat survey work carried out in June and July 2021 where each building was subject to a single dusk emergence (B2, B3, B4 and B6) or dawn re-entry (B1 and B5) survey. In line with the bat emergency/re-entry surveys carried out within the site, the potential of habitats to support roosting bats was found to be low. However, further recommendations are proposed.
- 21.16 No evidence of invertebrate activity on site was recorded during the site survey. A small number of records of stag beetle was recorded 0.2km north of the site from the desk-based study. The site is unlikely to support an assemblage of common invertebrate species. It is recommended that any new planting be composed of native species or species of known wildlife value.
- 21.17 A number of mitigation and enhancement measures are proposed including a Construction Environmental Management Plan to mitigate any impacts during demolition and construction, bat sensitive lighting strategy, further surveys works if works on the site commence after a significant time (e.g. 2 years), removal of suitable roofing tiles should be handled with care, if bat is found during construction all works to that building will cease and advice from an ecologist will be sought, artificial bat and bird boxes and bee bricks, timing of site clearance and commencement of works to be taken outside the breeding bird season or an ecologist's check should be undertaken prior to any works commencing to confirm the presence/absence of nest sites, clearance of all invasive species, biodiverse green roofs with additional features such as log piles, bare shingle and sandy piles.
- 21.18 The Defra 2 Metric calculator indicates a Habitat Biodiversity Impact Score for the proposals within the site boundary of +0.01 Habitat Units representing an increase of 0.6% within the site boundary.
- 21.19 As discussed in section 14 of this report, the Urban Greening Factor (UGF) calculator showed that the residential scheme will achieve a factor of 0.42 which is slightly higher than the 0.4 required by London Plan policy G5. A Landscape Maintenance Plan for the soft landscaping features has been also included. It is also noted that the Landscape Report shows an UGF of 0.46.
- 21.20 The Landscape Report provides details of the different planting species proposed and bird and bat boxes as well as log piles and green roofs. Final details will be secured via condition.

21.21 Based on the findings of the EA, the demolition and construction works will not have an impact on the designated sites due to the location of the proposed site. The habitats identified within the site are also considered of poor quality so their clearance will not have an impact on foraging bats, birds and protected planting. Landscaping proposals and enhancements will improve the value of the site for these species.

21.22 Whilst the measures proposed are generally supported, the following measures should be considered by applicant and have therefore been conditioned:

- a) any trees removed should be replaced with trees of high ecological value;
- b) any trees retained should be protected during demolition and construction;
- c) Maximisation of biodiverse green/biosolar roofs and compliance with GRO Green Roof Code 2021;
- d) Maximisation of the Urban Green Factor;
- e) use of organic pesticide;
- f) night-scented flowering plants such as thyme, sweet rocket, honeysuckle, catchfly, to attract nocturnal invertebrates for bats to prey upon;
- g) artificial bat bricks;
- h) use of organic pesticide; and
- i) winter berry species to provide nesting bird opportunities.

21.23 A Landscape and Ecological Management Plan should be provided to demonstrate the actions for the first five years after project completion including management responsibilities and long-term design objectives. This requirement will be conditioned.

22 Noise and Vibration

22.1 Paragraph 174 of the NPPF requires that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

22.2 Policy D14 of the London Plan (2021) states in order to reduce, manage, and mitigate noise, to improve health and quality of life, residential, and other non-aviation development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life, and separating new noise-sensitive development from major noise sources (such as road, rail, air transport, and some types of industrial use) through the use of

distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation.

- 22.3 Policy E(a) states that housing or other sensitive uses will not normally be permitted on sites adjacent to existing problem uses, unless ameliorating measures can reasonably be taken.
- 22.4 Policy H5 Housing Design of the Core Strategy expects that an acceptable level of noise insulation being achieved by means of sensitive design, layout and in development vulnerable to transportation noise and vibration.
- 22.5 The applicant has submitted a Noise Impact Study as part of the submission, in which it is confirmed that a noise measurement survey was carried out over a 2-day period at the proposed development site. The initial site risk assessment identified that the part of the site closest to Pier Way has a medium risk in terms of noise during both the daytime and at night. The majority of the site, however, has a negligible risk in terms of noise during both the daytime and at night. Where risks have been identified, suitable glazing and ventilation specification have been provided to offset this. The assessment has also shown that the majority of flats will have access to a balcony with acceptable noise levels, and that all flats will have access to a relatively quiet communal amenity area which would achieve the lower guideline criterion. Additionally, the noise levels within the rear gardens for the houses will achieve the lower guideline criterion. It can therefore be safely concluded that amenity area noise levels will be acceptable. Noise from plant equipment has also been shown to achieve the requirements of the Council.
- 22.6 The proposed development has been reviewed by the Council's Environmental Protection team, who confirmed that the context of the site seems reasonable for this residential development. Moreover, the relevant Officer confirmed that the details provided in the Noise Impact Study were generally seen as satisfactory, with acceptable noise levels predicted inside the development. No objections were therefore raised subject to standard residential noise conditions.

23 Air Quality

- 23.1 In terms of air quality, Part B of Policy SI 1 of the London Plan states:
- I. Development proposals should not:
 - a) lead to further deterioration of existing poor air quality

- b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
- c) create unacceptable risk of high levels of exposure to poor air quality.

2. In order to meet the requirements of Part I, as a minimum:

- a) development proposals must be at least Air Quality Neutral
- b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures
- c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
- d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

23.2 Additionally, Part D of Policy SI 1 confirms in order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance. The London Plan (2021) requirements is supported by Policy E(c) of the Core Strategy (2014).

23.3 The application was supported by an Air Quality Assessment prepared by Syntegra Consulting (report ref: Ref: 20-7187 dated August 2021). This has been reviewed by the Council's Environmental Health Officer, who raised no objections subject to conditions being attached.

24 Land Contamination

24.1 Policy E(e) of the Core Strategy require a preliminary site investigation for developments confirming the presence of contamination and any appropriate remediation measures are applicable to ensure the site can be occupied safely without any adverse impacts.

24.2 In support of the application a CGL Geoenvironmental Report - Ref: CG/38206A, Feb 2021 has provided an initial characterisation of the site to be developed. This has been reviewed by the Council's Environmental Protection Officer and the Environment Agency. Both parties confirmed that in principle, based on the assurances and accuracies of documents provided, the initial measures advocated in the report were acceptable, subject to the inclusion of relevant conditions.

25 Flood Risk and Surface Water

25.1 Policy E2 of the Core Strategy states that new developments should apply the sequential and exceptions tests as detailed in the NPPF and the Council's Strategic Risk Assessment be used to inform development and reduce flood risk in the Borough. Policy E3 states that within those areas protected by flood defences but with a high residual risk classification should implement risk reduction measures with the primary aim of reducing risk to life.

25.2 Policy SI 12 London Plan (2021) states development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

25.3 The site lies in predominantly Flood Zone 3, but benefits from flood defences which reduces the risk to this area. According to the Risk of Flooding from Surface Water mapping, available on the gov.uk website, the majority of the site is at a very low risk of surface water flooding (<0.1% Annual Exceedance Probability (AEP)). However, there are surface water flow pathways of low risk (between 0.1% to 1% AEP) shown to flow and pond at topographical low points in roads adjacent to the site boundary. The closest known watercourse (fluvial and tidal) is the River Thames, which runs approximately 300m west from the site. The site is within Flood Zone 3. The site is defended and is at residual risk of tidal flooding due to a breach/overtopping event.

25.4 A pond is also located immediately to the south and east of the site.

25.5 The Environment Agency Groundwater Vulnerability Map indicates the site has a medium - high flooding susceptibility. British Geological Society (BGS) mapping shows that the area has a bedrock geology comprising of Thanet Formation, with superficial deposits of alluvium.

25.6 A Flood Risk Assessment and Drainage Strategy have been submitted as part of the current application. The submitted reports have been reviewed by the Council, as the Local Lead Flood Authority, and no objections have been

raised. A condition is however proposed to secure a detailed design of a surface water drainage scheme. The EA were also consulted and similarly raised no objections, subject to a condition regarding the finished floor levels within the scheme.

- 25.7 Subject to compliance with the aforementioned conditions, the proposal is concluded as complying with the relevant local, London, and national planning policies for flood risk.

26 Refuse

- 26.1 Part E of Policy D6 within the London Plan (2021) states, housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.
- 26.2 Policy H5 of the Core Strategy states that the Council should expect from new residential development adequate provision for waste recycling (xi). Part ii. of Policy H5 requires that the design of the development is consistent with Policy DH1, and within DH1, all developments are required to demonstrate on-site waste management including evidence of waste reduction, use of recycled materials and dedicated recyclable waste storage space.
- 26.3 The RBG New Developments: Guidance Notes for the storage and collection of waste and recycling materials (May 2018) sets out the Council's requirements for its waste and collection services, and should be used by applicants when considering the waste strategy for a proposed scheme within the Borough.
- 26.4 The applicant has provided details of waste arrangements on the site. This would see communal bin stores for the majority of flats and individual 240L bins for the proposed dwellinghouses. A small number of ground floor flats which would be accessed via independent entrances rather than the main building cores would be outside the carry distance to the proposed communal refuse stores and so will be provided with individual 240L bins. The Council's Street Services team originally raised concerns with these arrangements as they outlined that these may attract fly tipping. However, it was agreed that a condition securing lockable bin stores for said units would provide a suitable solution to this and a condition to this effect is therefore proposed. The applicant also confirmed that a contracted managing agent would move the individual refuse bins to the identified collection area on a weekly basis to correspond with refuse collection days, with the same managing agent also maintaining the bulky waste provisions. This was considered acceptable by the Street Services Officer.

26.5 On this basis it is considered that the proposed refuse arrangements are acceptable, subject to the aforementioned condition.

27 Community Infrastructure Levy (CIL)

Mayoral CIL 2

27.1 The Mayor introduced a new London-wide Community Infrastructure Levy (CIL) on 1 April 2019. It is payable upon commencement of development. The Mayor's CIL2 will contribute towards the funding of Crossrail2. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £25 per square metre and the development would be subject to this.

RBG CIL

27.2 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. Residential development in this area is liable to pay £70 per square metre (subject to indexation).

28 Legal Agreement

28.1 Policy IM1 of the Royal Greenwich Local Plan sets out that all qualifying developments will provide for the infrastructure, facilities, amenities and programmes that are considered necessary to support and serve the development and offset any harm. When applicable, this is in addition to the Community Infrastructure Levy.

28.2 The development of this site will require a legal agreement, and the following Heads of Terms have been agreed between the Royal Borough of Greenwich and the applicant:

- Affordable Housing and Wheelchair Units Provision of:
 - 117 Social Rented Units at London Affordable Rent Level
 - 10% Wheelchair accessible units
 - Provision of an affordable housing delivery plan
 - Provision of an affordable housing lettings plan
 - Agreement protocol for the Council to advertise to individuals living and/or working in the Borough in the first instance

- To use reasonable endeavours to keep service charges for affordable tenants to a minimum
- Provision of affordable housing in perpetuity
- Early stage review mechanism to ensure that the scheme delivers the maximum amount of affordable housing and maximum S106 contributions required to achieve a policy compliant scheme if not commenced within two years.
- Highways
 - £270,000 payment to TfL for additional bus service at peak times.
 - £40,000 for cycle lane improvements along Pier Way.
 - Improvements to Pier Way footpath adjacent to the site.
 - £6,700 for cycle training consistent with the Council’s Cycling Strategy and SPD requirements.
 - Commitment for developer to establish a car-club, with residents of the development given 5 years free membership.
 - £60,000 for public consultation exercise for the establishment of a Controlled Parking Zone and commitment that residents of the development would not be eligible for a permit should such parking measures come into force in the future.
 - Travel Plan
- £318,000 contribution towards healthcare infrastructure
- Commitment and Participation in GLLaB and an Employment Training contribution towards GLLAB of £333,000.
- Carbon Offsetting Payment
 - Payment of £475,805.00 to the Council’s Carbon Offsetting fund. Payment to be due prior to the occupation of the development to incentivise further on-site savings during the construction period.
- Maintenance of the “pocket park” at developer’s expense, which is to be provided as public open space.
- Commissioning of artwork by local artists to be implemented within the development.
- Payment of Legal Costs and S106 Monitoring.

29 Public Sector Equality Duty (PSED) and Human Rights

29.1 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.

29.2 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.

30 Conclusion

- 30.1 The proposed development is considered acceptable in principle, with the Council's Adult Social Care team confirming that the loss of the care home use would not impact on overall provision within the Royal Borough. It has therefore been concluded that there is no identified need for the Gallion's View Care Home and no objections are therefore raised to its loss. The provision of residential units on the land is also acceptable in land use terms, on what is now a vacant brownfield site. The proposed residential units would positively contribute towards the Borough's housing target, increasing the supply of housing in accordance with the NPPF. Moreover, the site's location in an Opportunity Area and Strategic Development Location is considered appropriate for such uses and would comply with the objectives of the London Plan and Royal Borough of Greenwich's (RBG) Core Strategy.
- 30.2 The proposed unit mix is considered to be acceptable and would deliver a good range of dwelling types for future occupants of the development. The proposed 35% affordable housing offer (41.7% by hab room) is welcomed, with a high proportion of family sized units given over to the affordable tenure. This provision will aid in addressing the borough's housing need and will help to meet the needs of families on the Housing Register. Whilst no intermediate affordable housing products are proposed, given feedback from the registered provider who will be partnering with the applicant on the scheme (Optivo), it is acknowledged that this will more adequately meet the needs of the local community, and as such this can be supported in this instance. The development does qualify for the Mayor's fast-track route but will be subject to an early stage review should it not be implemented within two years of a positive decision.
- 30.3 The proposed residential units would provide a good standard of accommodation for future residents. The overall design of the development is considered to be well thought through and generally responds well to the locality given the constraints of the site. Whilst the proposed tower element of Block B would be higher than the immediate neighbouring properties and is not located in an area designated for tall buildings, given its location adjacent to a large area of open space in the form of the Broadwater Dock, it is considered that in this instance it can be supported. Moreover, the submission has demonstrated that the impacts of the proposed development, including the tower, would be acceptable in regard to neighbouring residential uses. It is also considered that the development would have an acceptable

impact in local heritage assets, noting the public benefits which would be secured through the delivery of the scheme.

- 30.4 Whilst not car-free, the proposed parking provision is considered appropriate given the lack of parking restrictions on surrounding roads and the very low PTAL score of the site. Furthermore, the scheme would secure funding to allow for the consultation for a CPZ in the area, which if accepted by local residents would enable the implementation of parking restrictions and would allow future developments in the locality to be delivered as car-free. In addition, the development would incorporate other measures to promote sustainable travel, such as the creation of a car club and a financial contribution towards improvements to the existing cycle lane on Pier Way. The parking which would be delivered on site would also see a high proportion of spaces provided with electric charging points (40%), with infrastructure to facilitate such provision to all remaining spaces in the future. A financial contribution would also be made by the applicant to TfL to increase local bus services during peak times.
- 30.5 Considerations around sustainability and energy, ecology and biodiversity, pollution, flood risk and refuse have also been assessed as part of Officer's considerations and have been found to be acceptable.
- 30.6 Overall, the proposal is considered to represent an efficient use of a brownfield site in a sustainable location, and on this basis, it is therefore recommended that permission be granted for application reference 21/2040/F, in line with section I of this report..

Background Papers:

Planning (Listed Building and Conservation Areas) Act 1990

National Planning Policy Framework (2021)

The London Plan (2021)

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

Supplementary Planning Documents

Responses from Consultees

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