

<b>PLANNING BOARD</b>	<b>Agenda Item: 6</b>
<b>2 February 2021</b>	<b>Reference No: 19/4075/R</b>

**Applicant:** Greenwich Millennium Village Ltd  
**Agent:** Gerald Eve LLP

<b>Site Address:</b> Plots 401-405, Parcel 4, Greenwich Millennium Village, 3-5 Peartree Way, Greenwich, SE10	<b>Ward:</b> Peninsula Ward  <b>Application Type:</b> Reserved matters
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## **I.0 Recommendation**

I.1 The Board is requested to grant consent for reserved matters consent as outlined below:

Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission Reference 19/1545/MA for the construction of 489 residential dwellings, plus associated infrastructure, landscape, car parking and associated works at Plots 401, 402, 403, 404 and 405 (Parcel 4).

I.2 Subject to:

- i) 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 paragraph 25.4 out in this report (see section 27.0), any addendums, and the minutes of this Planning Board meeting;
- ii) The recommended conditions as set out in this report (Appendix 2);
- iii) To authorise the Assistant Director of Planning & Building Control to:
  - a) make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2), its addendums and the minutes of this Planning Board meeting, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice; and
  - b) 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, its addendums and the minutes of this Planning Board meeting.

- iv) 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 obligations which would have been secured, and if so, to determine the application with reasons for refusal which will include the following:
  - i) In the absence of a legal agreement to secure the restriction of the occupation of all residential units in Plots 401-405 until Plot 503 has been delivered to accord with the acoustic requirements set out in the Sandy Brown reports, the proposed residential units would be subject to excessive noise which would result in a poor living environment for future occupants contrary to policies 3.5 and 7.15 of the London Plan 2016 (as amended), Policies H5, E(a) of the Core Strategy and Policy D14 of the Publication London Plan. In addition, the failure to mitigate the impacts from the existing activities at the protected wharves could jeopardise the viability of these established and ongoing activities contrary to policy 7.26 of the London Plan (2016) and policies D13, D14 and SI 10 of the Publication London Plan.

## **2.0 Executive Summary**

- 2.1 Officers have considered the circumstances of this application against the relevant development plan policies in the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), the London Plan (2016), the National Planning Policy Framework and National Planning Practice Guidance and have concluded that:the principle of redevelopment and general parameters for the proposed were established by the outline consent. These are discussed further within the relevant section, and include design (heights & footprint), access, uses, sustainability, parking, affordable housing, and family units. The application is consistent with the outline consent.
- 2.2 The application site is constrained by contaminated land which prevents underground parking/basements and noise from the adjoining Aggregates Works which can operate 24/7 meaning the proposed requires extensive acoustic mitigation. These site constraints have been accounted for within the proposal.
- 2.3 Each block is designed as a podium block which centres around a communal courtyard with parking provision underneath. The proposed elevational treatment offers a subtle colour strategy. It is considered that the proposed is well designed. The scheme also includes a well designed central public square.

2.4 The application proposes a total of 489 units, the breakdown is as follows:

	Private	Affordable Rented	Shared ownership	Total
1 bed	11	0	17	28 (6%)
2 bed	210	26	18	254 (52%)
3 bed	167	0	25	192 (39%)
4 bed	2	0	13	15 (3%)
Total	390	26	73	489
Percentage	80%	5%	15%	100%

2.5 The proposed includes 20% affordable housing. Of the total 99 affordable units, 26% are shared ownership and 74% are affordable rent, taking account of the proposed and the consented scheme. The outline planning consent requires a total of 20% affordable housing provision with a tenure split of 70% affordable rent and 30% shared ownership. The masterplan is delivering 20% affordable housing (349 units) with a tenure split of 70% affordable rent (245 units) and 30% shared ownership (104 units). In addition, the application has been subject to viability testing, which confirmed that no further units could be provided.

2.6 The application has been subject to consultation with statutory consultees, local residents and interested groups. A total of one objections have been received from local residents. These are detailed in Section 8 of this report along with the responses from internal and external consultees.

2.7 The scheme is not liable to Mayoral or Borough CIL as the outline consent was approved prior to the adoption of either. The outline consent was subject to a number of financial and non-financial obligations, secured through a Section 106. These are applicable to this plot also.

2.8 The application is considered to comply with the parameters of the outline consent and is recommended for approval.

### 3 **Summary**

3.1 Detailed below is a summary of the application:

<b>The Site -</b>	
Site Area (m <sup>2</sup> )	2.4ha
Local Plan Allocation	Part of site allocation GP5 in the Site Allocations Preferred Approach August 2019 for Residential and A, B1 and D uses

Heritage Assets	Not applicable
Tree Preservation Order	No
Flood Risk Zone	Flood Zone 3 - Area benefiting from flood defences

<b>Proposed Building</b>	
Building height (metres AOD)	33.50 AOD m maximum
No. of storeys	Maximum 8 storeys with elements at 6, 5, and 2 stories
Floor area (GEA) (m <sup>2</sup> )	Plot 401 – 12,628 m <sup>2</sup> Plot 402 – 11,530 m <sup>2</sup> Plot 403 – 11,712 m <sup>2</sup> Plot 404 – 12,053 m <sup>2</sup> Plot 405 – 11,536 m <sup>2</sup>  Total – 59,459

<b>Housing</b>		
Density	Units per Hectare (u/ha) and/or Habitable Rooms per Hectare (hr/ha)	204u/ha 720hr/ha
Dwelling Mix	Studio (no. / %)	0 / 0%
	1-bed (no. / %)	28 / 6%
	2-bed (no. / %)	254 / 52%
	3-bed (no. / %)	192 / 39%
	4-bed (no. / %)	15 / 3%
	Total (no. / %)	489 / 100%
Affordable Housing / Tenure Split	Overall Affordable Housing (no. / %)	99 / 20.25%
	Affordable Rent (no. / %)	73 / 73.74%
	Intermediate / Shared Ownership (no. / %)	26 / 26.26%
	Private (no. / %)	390 / 79.75%
	Commuted Sum	-
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes

<b>Transportation</b>		
Car Parking	No. existing car parking spaces	0
	No. Proposed Car Parking Spaces	Plot 401 – 45 Plot 402 – 30 Plot 403 – 40 Plot 404 – 30 Plot 405 – 25  Total – 170
	Proposed Parking Ratio	0.35:1
Cycle Parking	No. Proposed Cycle Parking	950 long stay and 20 short stay spaces  Plot 401 – 200 Plot 402 – 183 Plot 403 – 181 Plot 404 – 198 Plot 405 – 188  And 4 short stay spaces per plot
	Complies with policy	No – however, the applicant has committed to updating this and this will be reported in an addendum report.
Public Transport	PTAL Rating	3 / 4

<b>Sustainability / Energy</b>	
BREEAM Rating	N/A
Renewable Energy Source (%)	22.8%

<b>Public Consultation</b>	
Number in Support	0
Number of objections	1
Main issues raised	<ul style="list-style-type: none"> <li>• Development is too dense</li> <li>• Lack of amenity space and community facilities</li> <li>• Too close to adjacent roads</li> </ul>

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

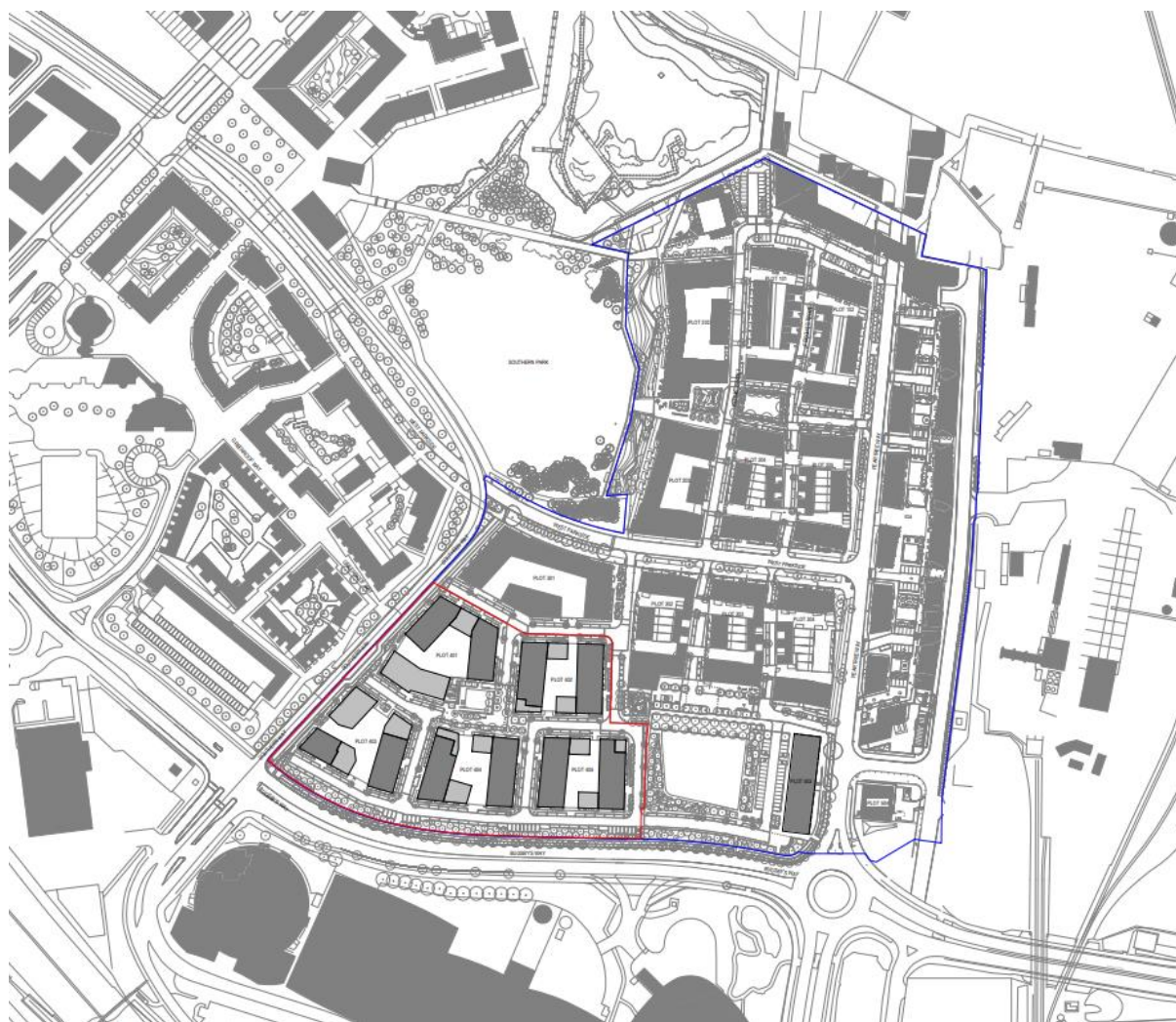
3.3 The application is considered acceptable and is recommended for approval, subject to conditions set out in the report.

#### 4 **Site**

4.1 Greenwich Millennium Village Phases 3, 4, 5, Peartree Way, Greenwich, SE10

4.2 This reserved matters application relates specifically to Plots 401, 402, 403, 404 and 405 of the development.

4.3 The following shows the site location plan for the reserved matters application (outlined in red):



## 5 **Site and Surrounding Area**

- 5.1 The application site forms Plots 401, 402, 403, 404 and 405 of the Greenwich Millennium Village (GMV345) development and comprises an area of approximately 2.4 hectares.
- 5.2 The application site is currently unused.
- 5.3 The site area forms part of the wider redevelopment site known as Greenwich Millennium Village (GMV) Phases 3, 4 and 5 which has outline planning permission to be developed for 1,746 residential dwellings, commercial, retail and community uses by the outline permission dated (“the Outline Planning Permission / OPP”). Planning permission 12/0022/O as amended by 14/1633/MA and 19/1545/MA reserves all matters except for access and Parcel 1.
- 5.4 To the north of the site is Plot 301. This received detailed consent under planning reference 19/2055/R and construction has commenced on site. Plot 301 is a podium block containing 135 residential units and has a maximum height of 10 storeys with elements at 8, 5, and 4 stories centred around a 2 storey central podium. The plot proposes a light buff brick.
- 5.5 To the north east of Parcel 4 are Plots 302-304. These plots have been granted detailed consent for 170 residential dwellings and 613 sqm GEA Class A1-A4 retail/commercial units (18/1318/R). Directly to the east is Plots 501-503 which is yet to receive detailed consent however an application has been made under reference 19/4058/R. This plot contains a large area of landscaping at Plots 501-502 and a non-residential building at Plot 503 which is proposed at five storeys.
- 5.6 To the south of the site is Bugsby’s Way which is a highly trafficked road. There is a line of trees that separate the application site and the road. On the opposite side of Bugsby’s Way is the Millennium Leisure Park, which includes stores such as B&Q, Ikea and the Odeon Cinema.
- 5.7 To the west of the application site, on the opposite side of Southern Way, is the original phases of Greenwich Millennium Village (Phases 1 and 2) which are not included within the redline boundary of the outline consent against which this reserved matters application is being considered (14/1633/MA). The adjacent blocks range from 2 to 4 storeys in height. Southern Way is a bus route only and there is a bus stand roughly half way down Parcel 4 between Plots 401 and 403.

## 6 Relevant Planning History

- 6.1 Planning permission was initially granted on 30 March 2012 for a hybrid outline planning application for 1,746 residential units and 6,902 sq.m of non-residential floorspace comprising A1/A2/A3/A4/B1/ D1 and D2 uses; and full details for Parcel 1 for 459 of the residential units, an energy centre, open space, hard and soft landscaping, associated car parking, servicing, highways and transport works and ancillary works (Ref. 12/0022/O).
- 6.2 09.04.2014 – Reserved Matters (appearance, layout, scale and landscaping), for Parcel 2 Sub-Phase 1 of Greenwich Millennium Village Phases 3, 4 & 5 pursuant to Condition 2 of Outline planning permission dated 30/03/2012 (Ref: 12/0022/O) for the erection of 83 residential dwellings including associated infrastructure and car parking (Ref: 13/3281/R). This application was approved.
- 6.3 23.12.2014 - Minor Material Amendment under s73 to vary condition 1 (Approved Plans) of outline planning permission dated 30/03/12 (ref: 12/0022/O) involving changes to the footprint, no. of units, floorspace, elevations and associated landscaping in respect of Block 107. The application was approved and the scheme has been implemented.
- 6.4 24.02.2017 - Reserved Matters (Appearance, Landscaping, Layout and Scale) pursuant to condition 2 of planning permission dated 23/21/2014 (Reference: 14/1633/MA) for the erection of an energy centre (EC2) and associated infrastructure, landscape and parking was received for Plot 504. This application was approved (reference: 17/0576/R).
- 6.5 21.06.2017 - Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to Condition 2 of Planning Permission dated 24/12/2014 (Reference: 14/1633/MA) for the construction of 112 residential units with associated landscaping, infrastructure and parking was received for Plots 204 & 205. This application was approved (reference: 17/1631/R).
- 6.6 05.09.2018 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Outline Planning Permission dated: 24/12/2014 (Reference 14/1633/MA) for the construction of 170 residential dwellings and 613 sqm GEA Class A1-A4 retail/commercial units, associated infrastructure, landscape and car parking plus temporary vehicle turning area for refuse/servicing vehicles and temporary GMV345 Concierge and Management Suite, situated immediately south of the site (18/1318/R). This application was approved.



- 6.7 11.06.2019 - Section 96a of the Town & Country Planning Act 1990 for a non-material amendment in connection with the planning permission 14/1633/MA, dated 23/12/2014 for the application for Minor Material Amendment under s73 to vary condition 1 (Approved Plans) of outline planning permission dated 30/03/12 (ref: 12/0022/O) involving changes to the footprint, no. of units, floorspace, elevations and associated landscaping in respect of Block 107 to allow:
- Amendment to wording of Condition 14 (Density) in respect of Parcel 3 and Parcel 5.
- This application was approved (reference: 19/1636/NM).
- 6.8 09.09.2019 - Section 73 of the Town & Country Planning Act 1990 for a minor material amendment in connection with the planning permission 14/1633/MA (dated 23/12/2014) for mixed use development comprising: up to a total of 1,746 Class C3 residential units; up to a total of 1,190 sq.m (GEA) Flexible Class A1 (shops) and/or A2 (financial and professional services) and/or A3 (restaurants and cafes) and/or A4 (drinking establishments); up to a total of 4,462 sq.m (GEA) business space for B1(a) (offices) and/or B1(b) (research and development) and/or B1(c) (light industry); up to 500 sq.m (GEA) Class D1 for a children's nursery; up to a total of 750 sq.m (GEA) Class D2 for community space and a management facility; up to a total of 992 sq.m (GEA) for two energy centres; associated open space, hard and soft landscaping, car parking and servicing, highways and transport works and ancillary works; with all matters reserved for future approval except for access (Outline Application). In addition to the matters set out above, full details (access, appearance, landscaping, layout, scale) in relation to the first sub-phase, being Parcel 1, located to the north and east of the site for: 459 residential units; a 365 sq.m energy centre; associated open space, hard and soft landscaping, car parking and servicing, highways and transport works and ancillary works.
- To allow:
- Amendment to density requirement
  - Redistribution of non-residential floor space
  - Reduction in Car Parking Provision
  - Revision to Phasing
  - Increase in height by 1m on Plots 202, 203, 301, 401-405, 501-503
- This application was approved (reference: 19/1545/MA).
- 6.9 11.11.2019 - Submission of reserved matters application (appearance, layout, scale + landscaping) pursuant to condition 2 of planning permission dated 23/12/2014 (Ref:14/1633/MA) for the construction of 135 residential dwellings, ancillary residents screening room plus associated infrastructure, landscape and car parking (Plot 301). This application was approved (reference: 19/2055/R).

- 6.10 18.03.2020 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated 14/11/2019 (reference 19/1545/MA) for the construction of 122 residential dwellings, 152 sqm GEA Class A3 Cafe, 500 sqm Class D1 nursery, plus associated infrastructure, landscape and car parking on Plot 202. This application has been approved (reference: 19/3063/R).
- 6.11 21.11.2019 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated 14/11/2019 (Reference 19/1545/MA) for the construction of 119 residential dwellings, 750 sqm GEA Class D2 Community Centre and Management Facility, plus associated infrastructure, landscape and car parking on Plot 203. This application has been approved (reference: 19/4008/R).
- 6.12 02.12.2019 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated 14/11/2019 (Reference 19/1545/MA) for the construction of 65 residential dwellings with resident's lounge, plus associated infrastructure, landscape and car parking on Plot 201. This application is currently being considered (reference: 19/4064/R).
- 6.13 13.12.2019 - Reserved matters application seeking approval of appearance, layout, scale and landscaping, for Plot 501, 502 and 503 (Parcel 5) of Greenwich Millennium Village Phases 3, 4 & 5 development (GMV 345) pursuant to Condition 2 of outline planning permission reference 19/1545/MA dated: 14/11/2019, involving the provision of 4,887 sqm of commercial floorspace (comprising 4,462sqm of Use Class B1 floorspace and 425sqm of Use Class A1 and/or A2 and/or A3 and/or A4 floorspace), plus associated infrastructure, landscape and car parking. This application is currently being considered (reference: 19/4058/R).
- 6.14 19.12.2019 - Removal of the existing Gatehouse and adjoining buildings and the erection of a new Ecology Park Building to also include the diversion of the cycle path and associated ecological works. This application is currently being considered (reference: 19/4092/F)
- 6.15 07.02.2020 - Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated: 23/12/2014 (Reference 14/1633/MA) for the construction of 65 residential dwellings, with resident's lounge, plus associated infrastructure, landscape and car parking on Plot 201 (reference: 18/0825/R). This application was refused by the Planning Board on 14.11.2018 and has subsequently been allowed by appeal on 07.02.2020 (reference: APP/E5330/W/19/3228947).

6.16 19.01.2021 - Environmental Impact Assessment Screening Opinion under the Town & Country Planning (EIA) Regulations 2011 for redevelopment of the site to include the construction of 489 residential dwellings, plus associated infrastructure, landscape and car parking pursuant to condition 2 of planning permission dated 14/11/2019 Ref: 19/1545/MA. It has been determined that an addendum to the Environmental Statement is not required (reference: 19/4095/EIA).

## 7 **Proposal**

7.1 The principle of redeveloping the application site for residential development has been established by the Amended Outline Planning Permission (Ref. 19/1545/MA). The outline scheme set the parameters for the quantum of development, range of uses, maximum building heights and massing together with hierarchies of open spaces and circulation routes.

7.2 The detailed design of Plots 401-405 was reserved for approval through the submission of Reserved Matters applications. In particular, the external appearance, internal layout, scales and landscaping has been reserved for future consideration.

7.3 Reserved Matters consent is sought for the construction of 489 residential dwellings, plus associated infrastructure, landscape and car parking.

7.4 The application proposes a total of 489 residential units. The breakdown of housing is as follows:

	Private	Shared Ownership	Affordable Rent	Total
1 bed	11	0	17	28 (6%)
2 bed	210	26	18	254 (52%)
3 bed	167	0	25	192 (39%)
4 bed	2	0	13	15 (3%)
Total	390	26	73	489
Percentage	80%	5%	15%	100%

## 8 **Consultation**

### 8.1 **Statutory Consultees**

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

<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officers comments</b>
Environment Agency	We have reviewed the submitted documents and the finished floor levels are more than 300mm above the predicted Maximum Likely Water Level, therefore we have no concerns.	Noted
London Fire & Emergency Planning	Satisfied with the proposal in relation to the fire precautionary arrangements, subject to access and facilities for the fire service complying with the functional requirements of B5 of Approved Document B	This has been included in an informative to advise the applicant.
Transport for London	No objection raised but raised concerns that the streets to be dominated by car parking; visibility when entering or existing the undercroft parking is restricted by car parking spaces; the cycle parking spaces do not comply with the London Cycle Design Standards and it is questioned whether the roads are appropriate for two way traffic, especially for larger vehicles such as delivery vans.	The quantum of car parking is symptomatic of the historic nature of the Outline Planning Permission which dates back to 2012. Subsequent applications have sought to reduce this but the masterplan maintains a ratio of 0.34:1 site wide. The applicant has committed to updating the plans to remove the car parking spaces that affected visibility from the undercroft parking and has committed to LCDS standards. Additional conditions will be imposed on this reserved matters application to require this detail to be submitted in consultation with TfL. The applicant has also provided additional justification to explain the traffic layout. It

		is also noted that the masterplan includes a concierge which will take the majority of parcels and therefore the presence of delivery vans will be minimal. Tracking diagrams for refuse and emergency vehicles has been provided to demonstrate that such vehicles will be able to enter and exit the site accordingly.
London City Airport	Proposal is acceptable subject to conditions being imposed	These conditions are included in Appendix 2 of this report.
Port of London Authority	Object to the application until it can be appropriately demonstrated that the acoustic measures necessary to safeguard the operation of the wharfs has been appropriately accounted for	The PLA have requested a number of conditions be imposed. These have all been accepted by the applicant. The conditions are in the advance stages of drafting in consultation with the PLA although final confirmation that these are acceptable has not yet been received. This will be updated in an addendum report.
Firstplan (on behalf of Cemex/Tarmac/Aggregate Industries/ Daygroup)	Confirmed that the application is acceptable subject to the imposition of conditions and obligations.	The conditions have been accepted by the applicant and are included in Appendix 2 of this report. The obligations are to be imposed by the Deed of Variation. The Heads of Terms for this can be found in Section 25 of this report.
GLA	No comments have been received at the time of writing the report.	As this is a reserved matters application, referral to the GLA is not required.
Natural England	No comments have been received at the time of writing the report.	It is considered acceptable to proceed with the determination of the

		application in the absence of these comments.
Thames Water	This site is located within a CleanWater & Waste Water-INSET Zone. Meaning the Clean Water and WasteWater operates are not Thames Water but another 3rd Party company.	Noted
Crime Prevention Officer	The submission is acceptable and should comply with the requirements of Secure by Design.	Compliance with Secure by Design is Required by Condition 34 of the outline planning permission.
GLAAS	Advised no objection to the proposal subject to the conditions attached to the outline consent being adhered to.	Noted
NHS CCG	Advised that there is insufficient capacity to accommodate the uplift in population and that a contribution should be allocated to address this.	The application does not result in an uplift against the masterplan development for a total of 1,746 units. The financial contributions required to make the masterplan acceptable were fully considered at the time the outline consent was granted and it is not possible to impose additional requirements at this stage.

## 8.2 Council Departments

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

<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officers comments</b>
Environmental Health	The information is satisfactory and there is no objection. The balcony noise levels are relatively high when compared to the target noise level. When the submission for Planning condition 87 is received, further justification will be required so that the criteria contained within the condition is suitably met.	This comment is noted as an informative and will be further discussed when Condition 87 is discharged.
Housing	The proposal complies with the requirements of the Outline Planning Permission	Noted
Waste Services	Requested that the bulky waste storage areas be reviewed at submission of details stage and requested confirmation that there is a dropped kerb positioned outside of each of the bin stores	The applicant has confirmed that there is a dropped kerb outside of each bin store and that full details of the bulky waste will be reviewed when discharging the planning condition attached to the Outline Planning Permission.
Sustainability and Renewal	The details submitted are acceptable subject to further information being provided at submission of detail stage and the imposition of additional conditions on the reserved matters application.	The additional conditions are included in Appendix 2 of this report.
Transport and Highways	No highway objection	Noted
Occupational Therapist	The application is acceptable subject to full details being provided at submission of detail stage.	Full details will be submitted pursuant to Condition 33 of the Outline Planning Permission. An additional condition requiring marketing details to be submitted prior to any marketing of the adaptable

		units has been included in Appendix 2 of this report.
Flood Risk Manager	No objection is raised to the reserved matters submission.	Noted

### 8.3 Local Residents

Public consultation consisted of a press notice, site notice and letters sent to 865 individual neighbouring properties. One response has been received. A summary of the consultation response received, along with the officer comments are set out in table below:

Summary of Comments	Officers comments
The proposed development is sited too near to the pavements and roads. It is very dense and lacking in play ground areas and green space. The uniform height of the proposed blocks is unattractive and not in keeping with the earlier phases of the Greenwich Millennium Village. Few community spaces are planned in the proposed development. The courtyard spaces are minimal. The landscaping planned does not add to the village atmosphere.	The blocks are located within the footprints and heights established by the outline consent. Design is discussed in Section 13; Density is discussed in Section 12 and Landscaping is discussed in Sections 16 and 17. The submission has been found to comply with the requirements of the Outline Planning Permission.

## 9 Planning Context

9.1 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 – 2019)**

#### **Technical Housing Standards – Nationally Described Space**

**Standard** (Department for Communities and Local Government – March 2015)

**The London Plan (March 2016)** - Full details of relevant policies refer to appendix 3.

#### **The Royal Greenwich Local Plan: Core Strategy with Detailed**

**Policies (“Core Strategy” – 2014)** - Full details of relevant policies refer to appendix 3.

Full details of relevant SPD / Documents refer to Appendix 3.



**The Publication London Plan** The Mayor has formally approved a new London Plan, the 'Publication London Plan'. It has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 to the Intend to Publish plan.

It has been sent to the Secretary of State for his consideration. He has up to 6 weeks to decide whether he is content for the Mayor to formally publish the Publication London Plan or apply for a further extension of time. Once the Mayor has formally received confirmation from the Secretary of State that he is content for the Publication London Plan to be published, the Mayor will proceed with the final steps to publish the final London Plan. On publication it will become the Spatial Development Plan for London and part of the statutory Development Plan for Greater London.

## 10 **Material Planning Considerations**

10.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application (Ref: 19/4075/R):

- Section 11 - Principle of development;
- Section 12 - Density;
- Section 13 - Visual Impact (Design and Townscape);
- Section 14 - Residential Units (Housing Mix, Affordable Housing, Wheelchair Units);
- Section 15 - Amenity for future residents and neighbouring properties (Size of units, Noise, Overheating, Sunlight/Daylight, Privacy, amenity space);
- Section 16 - Landscaping / Public Amenity Space / Communal Space;
- Section 17 - Child Play Space;
- Section 18 - Biodiversity;
- Section 19 - Sustainability and Energy;
- Section 20 - Transport and Access;
- Section 21 - Air Quality;
- Section 22 - Waste and Refuse Provision;
- Section 23 - Area of High Archaeological Potential;
- Section 24 - Flood Risk;
- Section 25 - Legal Agreement;
- Section 26 - Community Infrastructure Levy (CIL); and
- Section 27 - Implications for disadvantaged groups.

## 11 Principle of Development / Compliance with the outline consent

11.1 The principle of the development was established as part of the outline planning application approved on 30.03.2012, as amended by 14/1633/MA and 19/1545/MA.

11.2 The outline application as amended by 19/1545/MA established the following parameters for Plots 401-405:

### *Heights*

- Plots 401-405 – Each have parameter heights of 8 storeys to the east and west of the plot; 6 storeys to the south; 5 storeys to the north and 2 storeys in the centre. The footprints of Plots 402-405 are square in shape. No massing is proposed on the south-eastern corner of Plot 401 and the 6 storey element projects into the central 2 storey area slightly.
- A comparison against the maximum AOD requirements is as follows:

Plot	Outline Parameter Heights	As Proposed (RMA)
401	34.100m AOD	33.500m AOD
402	33.800m AOD	33.075m AOD
403	32.800m AOD	32.600m AOD
404	32.900m AOD	32.500m AOD
405	33.100m AOD	32.500m AOD

### *Land Use*

- Plots 401-405 – Solely Use Class A3 (Residential)

### *Car Parking*

- Plots 501-502 – Podium Parking in each plot
- Plots 401-403 – On-street Parking on the north, east and south side of the plots
- Plots 402-405 – On-street Parking on the north, west and south side of the plots
- Plot 405 – On-street Parking on all sides of the plots
- Southern road end-on parking along to southern border of the site

### *Access*

- Primary estate road to the south and east of the Parcel
- Secondary estate roads through the centre of the plots and to the north
- No access is permissible from Southern Way

- Foot and Cycle path runs along the western border of the Plot

### *Landscaping*

- Residential Courtyards in the centre of all plots, the courtyard to be visible from the south-eastern corner on Plot 401
- Green buffer zone to the southern boundary of the masterplan adjacent to Bugsby's Way
- Public Square in the centre of the Parcel adjacent to Plots 401, 402 and 404.

11.3 The proposed is found to be in accordance with the parameters and principles established by the outline consent.

11.4 A review of the Environmental Statement finds that the site has been suitably assessed in terms of a worst-case scenario. An EIA Screening Opinion concluded that the subsequent application (the reserved matters) did not indicate a change in circumstance from the initial Environmental Impact Assessment as was undertaken to support 12/0022/O and further assessments were not required.

11.5 The proposed is considered to be in substantial accordance with the outline consent and no in principle objection is raised.

## 12 **Density**

12.1 Policy 3.4 requires development to optimise housing output, subject to Chapter 7 (Living Spaces and Places) also being met. The supporting text notes that 'a rigorous appreciation of housing density is crucial to realising the optimum potential of sites' emphasising that it is only one part of the decision-making process. Publication London Plan Policy D3 moves away from the Density Matrix approach used in the existing London Plan towards a design-led approach to establish an appropriate density.

12.2 Based on the character, location of the site and the proposed development to be brought forward, it is considered the setting of the site is best described as Central in character. It is noted that the site does not fulfil the definition set out in London Policy 3.4; however, it is considered to more closely match the definition for central than urban given the building footprint and heights allowed by the outline consent.

12.3 Table 3.2 is a density matrix based on the suburban, urban or central nature of the sites location and accounting for the sites PTAL rating. This table should not be applied 'mechanistically' and decision makers must consider the

broader context (for example transport capacity, social infrastructure, local context etc.).

- 12.4 Using this table, the density range for this site should be 300-650 hr/ha and 100–240 u/ha for a central site with a PTAL of 2-3. This site has a PTAL of 2 / 3.
- 12.5 Notwithstanding the policy context, Condition 14 of the outline consent restricts the density for the site to be no less than 130 dwellings per hectare nor more than 210 dwellings per hectare.
- 12.6 The proposed provides 489 dwellings and 1,728 habitable rooms within a site area of 2.4ha. This equates to a density of 203.8 dwellings per hectare and 720 habitable rooms per hectare.
- 12.7 Whilst the proposed does marginally exceed the density range recommended in the London Plan for hr/ha, it is compliant with the u/ha recommended range and the density of the proposal is well within the parameters of the Outline Planning Permission.
- 12.8 As the proposal forms the final residential plot across the masterplan, it is necessary to ensure compliance site wide. The following table shows the breakdown by Parcel. Parcel 5 is non-residential only and therefore is not included.

<b>Parcel</b>	<b>Area (Ha)</b>	<b>Total Dwellings</b>	<b>Density (u/ha)</b>
Parcel 1	2.9	451	156
Parcel 2	2.67	501	188
Parcel 3	2.34	305	130
Parcel 4	2.4	489	204
<b>Total</b>	<b>10.32</b>	<b>1,746</b>	<b>169</b>

- 12.9 As can be seen from the table, the proposal and those which has received consent to date maintain a density of 169 across the masterplan. This is well within the range required by Condition 14 which sets a minimum of 130 and a maximum of 210 units per hectare.
- 12.10 The proposal accords with the masterplan requirements and maintains compliance site wide. The application is therefore considered to be acceptable in this regard.

### **13 Visual Impact (Design and Impact on the Character of the Surrounding Area)**

- 13.1 Policy 7.4 of the London Plan requires that development have regard to the local character, by considering “form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings”. Policy 7.5 further emphasises the need for development to “relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces”. Policy 7.6 of the London Plan states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 13.2 Policy DHI of the Core Strategy requires that all developments be of a high quality design and demonstrate that they positively contribute to the built and natural environment. The policy goes on to list the expectations of new development in achieving this policy aim.
- 13.3 Policy DHI is consistent with the NPPF which asserts in Chapter 12 (Achieving well-designed places) that “the creation of high quality buildings and places is fundamental to what the planning and development process should achieve”.
- 13.4 The Design and Access Statement submitted in support of the application sets out the various constraints for the site and details the conceptualisation of the design for these plots. The site constraints are listed as: noise from aggregates wharf, vehicular route (West Parkside & Peartree Way), surrounding residential development, and contaminated land.
- 13.5 The overall layout, scale and massing of Plots 401-405 was established by the outline consent. As noted earlier in the report, each plot was consented with parameter heights of 8 storeys to the east and west of the plot; 6 storeys to the south; 5 storeys to the north and 2 storeys in the centre. Section 11 sets out the parameter requirements in more detail and the parameters plans are shown within the Design and Access Statement.
- 13.6 The site occupies a prominent location in the masterplan and is highly visible from Southern Way and Bugsby’s Way. Plot 402 is the only plot proposed as part of this reserved matters application that is not visible from outside the masterplan. As such, the design must ensure the scheme suitably responds to its location.
- 13.7 Condition 98 of the Outline Consent required the reserved matters application in respect of the western corner of the site to include a

reassessment of its connectivity to the current phase 2 of the Greenwich Millennium Village. The proposed streets and routes through the site do not directly align to Phase 2. Directly aligning the blocks to create direct routes was not considered to be conducive to efficient development of Parcel 4 as it created a fragmented block arrangement. However the proposed route continues to offer ease of movement across both the newer and older parts of the GMV development as the proposed access route through Parcel 4 sits slightly to the south of Phase 2. Details of the how the applicant has sought to address Condition 98 is set out within the submission reports and the proposed design approach is set out in the Design and Access Statement.

- 13.8 The five residential building within this scheme have been designed around new estate roads with a new public square at the heart of the site. The plots are all designed with a maximum height of 8 storeys with a podium at first floor in the centre. There are also lower elements with Plot 401 including elements at 6 and 5 storeys; Plot 402 including 5 and 4 storey elements; Plot 403 including 7 and 6 storey elements and Plot 405 including elements at 5 storeys.
- 13.9 The massing of each plot and the proposals compliance with the outline parameters is shown in the following image taken from the Design and Access Statement. The yellow outline shows the parameter massing overlayed onto the proposed massing in blue. The blue plots in the masterplan image show the proposal in the wider context. It is noted that Plots 501-503 show the parameter massing rather than the proposed massing under 19/4058/R.



- 13.10 As can be seen from the image, each plot substantially accords with the parameter requirements although there are slight projections beyond the footprint.
- 13.11 The block typologies and arrangement complies with the footprint set out by the masterplan and has also been designed to create clear routes through the site to offer permeability and legibility which builds on the existing routes both through the masterplan and beyond the site boundary.
- 13.12 Each plot within the parcel has been designed as a podium building with the massing located around the perimeters and each plot providing a central courtyard amenity space. The design intent is to create a 'family' of buildings that offer their own character whilst maintaining harmony across the parcel. The buildings centre around a neighbourhood square which sits in the heart of the parcel. When designing the massing, the Design and Access Statement explains the massing has been carved away to respond to circulation and daylight/sunlight, openings for key views and to carve the massing for the corners of the blocks that face onto the square. The carving of the massing has also allowed roof terraces to be provided as additional amenity space.
- 13.13 Each plot is proposed as a brick building with metal detailing for architectural elements. The brick shall be a light buff brick. The metal work introduces the colour creating a more subtle approach than that employed on some other parts of the masterplan. Parcel 1 for instance includes bright, strong colours; whereas, the approach across Parcel 4 has been to use more earthy and natural tones. The emphasis on colour has been on the lower floors but this is integrated on the upper floors of the buildings by applying colour to the architectural elements of the proposal (such as window frames, balconies etc.). The intent behind this is to reinforce the connection to the earlier phases (including GMV 1 and 2) without becoming a pastiche. Additional design details are used across all plots; such as: ribbed brickwork is proposed on the ground and first floor, which is in line with earlier plots that have been delivered/consented, and some entrances are stepped back with more colour used in these areas for instance.
- 13.14 Condition 15 attached to the Outline Planning Permission requires facing materials to be submitted prior to commencement. Indicative materials can be found in the Design and Access Statement.
- 13.15 The application is also accompanied by a Landscaping Design Statement (set out in TM360R03A Landscaping Statement). The landscaping proposal is considered to enhance the public realm and be a positive feature of the scheme. Landscaping is discussed further in Section 16 of this report. Full details of landscaping is to be provided by way of condition.

13.16 The affordable units are located in Plot 403. The scheme has been designed to be tenure blind, in terms of the massing and appearance. There is no differentiation in the quality of the building, the quality of materials or colours, or spaces standards between the different tenures. This plot also contains a central courtyard with enhanced play equipment as well as two roof terraces. The cores are of similar sizes and will be completed with similar quality in materials and finish.

13.17 The design and visual impact of the proposal is considered to be high quality and overall accords with the design rationale for the wider site.

## 14 **Residential Accommodation**

### *Housing Mix*

- 14.1 London Plan Policy 3.3 and Publication London Plan Policy H1 seek to increase London’s supply of housing and, in order to do so, sets each borough a housing target. London Plan Policy 3.8 and Publication London Plan H10 supports the provision of different types and sizes of dwellings to provide a choice of homes for Londoner’s.
- 14.2 Local Policy H2 sets out that a mix of housing types and sizes will be required in all developments 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.
- 14.3 In terms of the outline scheme family units will make up 31% of the total number of units across the GMV phases 3, 4 & 5 site and condition 13 attached to 19/1545/MA sets out that the unit mix across the masterplan shall be as follows:

<b>Unit size</b>	<b>No. of units</b>		<b>Total</b>
	<b>Parcel 1</b>	<b>Parcels 2-5</b>	
<b>1 bed</b>	125	231	356
<b>2 bed</b>	216	640	856
<b>3 bed</b>	95	375	470
<b>4 bed</b>	15	49	64
<b>Total</b>	<b>451</b>	<b>1,295</b>	<b>1,746</b>



14.4 The breakdown of units as proposed in this reserved matters is as follows:

	Private	Shared Ownership	Affordable Rent	Total
1 bed	11	0	17	28 (6%)
2 bed	210	26	18	254 (52%)
3 bed	167	0	25	192 (39%)
4 bed	2	0	13	15 (3%)
Total	390	26	73	489
Percentage	80%	5%	15%	100%

14.5 As can be seen family units account for 207 out of the 489 units proposed, equating to 42%. These are provided as both 3 bed (39%) and 4 bed (3%) units. This is therefore above the requirement for 31% family provision. By plot, the breakdown is as follows:

	401	402	403	404	405
1 bed	8	3	17	0	0
2 bed	58	49	44	53	50
3 bed	38	41	25	44	44
4 bed	0	0	13	2	0
Total	104	93	99	99	94

14.6 As noted above, the 31% requirement is a site wide requirement. All other residential plots across the masterplan have been consented and therefore this reserved matters application must demonstrate compliance on a site wide level.

14.7 To date, including this application, the consented/proposed mix of units has been as follows:

	Condition 13	Consented Units	Percentage
1 bed	356	345	19.8%
2 bed	856	863	49.4%
3 bed	470	468	26.8%
4 bed	64	70	4.0%
Total	1,746	1,746	100%

14.8 As can be seen, there is a slight variation between the unit numbers set out in condition 13 and the proposed. There are 11 fewer 1 beds, 7 additional 2 beds, 2 fewer 3 beds and 6 additional 4 beds. Condition 13 requires that the proposal be in 'substantial accordance' with the mix set out in the condition. The differences are considered to be marginal and substantially in accordance.

In addition, the application proposes a greater number of family units than the Outline Planning Permission requires which is considered to be a positive. As such, it is considered that the unit mix is acceptable.

### *Wheelchair units*

- 14.9 A total of 50 units are proposed for wheelchair users in line with the requirements of the planning restrictions attached to the outline consent for 10% of all dwellings.
- 14.10 Of the private units a total of 40 units will be provided as wheelchair adaptable units, which equates to 10.2%. These are proposed in Plots 402, 404 and 405 and the unit size is as follows: 28x 2b3p and 12x 3b5p. The units will be subject to a marketing period, should there be no interest in the unit as wheelchair adaptable then the applicant will be able to advertise the units for non-wheelchair users. Full details of the marketing strategy shall be required by a condition imposed on the outline planning permission. The adaptable units within the Shared Ownership tenure are provided in Plot 403. The private tenure units are distributed amongst the remaining plots.
- 14.11 There are 73 social rent dwellings and 26 shared ownership dwellings in total across the proposal. The applicant is required to provide 10% as wheelchair accessible (affordable rent) and 10% as wheelchair adapted (shared ownership). This creates a requirement for 7 affordable rented units and 3 shared ownership units when rounded to the nearest whole. The application proposes the following, which accord with the requirements of the condition:

Affordable rent (7 total)

3 x 1B2P wheelchair units

2 x 2B4P wheelchair units

2 x 3B5P wheelchair units

Shared ownership (3 total)

3 x 2B4P wheelchair adaptable units

- 14.12 The accommodation schedule sets out that these have been designed to comply with the Greenwich Wheelchair Site Brief as per the conditions attached to the consent with additional details being provided post consent. Full details will be provided pursuant to condition 33 of the outline consent.

### *Affordable Housing*

- 14.13 Policy 3.12 describes the process of negotiating affordable housing provision in the decision-making process. The policy seeks to maximise the amount of

affordable housing sought considering 'current and future requirements for affordable housing'. Policy 3.12 requires planning decisions to take account of 'the need to encourage rather than restrain residential development'. Policy H5 of the draft London Plan sets out how the threshold approach applies to major development proposals which trigger affordable housing requirements.

- 14.14 The total affordable housing provision across the GMV Phases 3, 4 and 5 was considered at outline stage and the development is fixed as a minimum 20%, with a split of 70% social rented and 30% intermediate. The affordable housing provision has to some degree been front loaded with the first Parcel (Parcel 1) having 25% affordable housing. As such, later phases may well deliver less than 20%. The outline consent was considered against the policies of the Unitary Development Plan, which has now been superseded by the Core Strategy; however both set out a policy requirement for 35% affordable housing. As such, the 20% provision is significantly below this requirement and a review mechanism was included in the S106. A late stage review has also been included in the legal agreement attached to 19/1545/MA, this requires a viability review to be undertaken at the occupation of 75% of dwellings.
- 14.15 At reserved matters stage, the S106 agreement requires a review of the viability to be submitted for approval to ascertain whether any further affordable units can be provided. The review allows for the capture of potential future uplift from schemes that would be unviable if they provided the amount of affordable housing required in terms of Development Plan policies as a means of potentially increasing the amount of affordable housing should the viability of the scheme improve.
- 14.16 The reserved matters application provides 99 affordable units of the total 489 making 20.25%. Of these, 73 are proposed as affordable rented units and 26 are shared ownership. This creates a tenure split of 73:26. As such, the proposed generally accords with the requirements of the outline consent. The following tables set out how the applicant is compliant with the S106 requirements on a site wide basis.
- 14.17 All other residential plots have been consented and therefore Parcel 4 needs to ensure compliance with the obligations imposed across the masterplan. Including this reserved matters proposal, the masterplan includes a total of 349 out of 1,749 units as Affordable Housing. Of these, 245 are affordable rent and 104 are shared ownership. The masterplan therefore complies with the requirement for 20% of units to be affordable housing with a tenure split of 70% Affordable Rent and 30% Shared Ownership.

14.18 The breakdown of affordable, including the tenure breakdown, across the masterplan to also include the proposed reserved matters is as follows:

Parcel	Total Units	Total Affordable	%	Affordable Rented	%	Shared Ownership	%
Parcel 1	451	113	25.1%	80	70.8%	33	29.2%
Parcel 2	501	83	16.5%	54	65.0%	29	35.0%
Parcel 3	305	54	17.7%	38	70.3%	16	29.7%
Parcel 4	489	99	20.2%	73	73.7%	26	26.3%
Parcel 5	-	-	-	-	-	-	-
Total	1,746	349	20%	245	70%	104	30%

14.19 As can be seen from the above, the applicant is compliant with the obligations required by the S106.

*Viability Assessment*

14.20 In accordance with the requirements of the legal agreement and current policy, a viability assessment has been submitted with the application. The Independent Viability Assessment undertaken by BPS concludes that:

*The appraisal before our changes produces a profit output of 17.49% of GDV (£153,730,215) compared to a target profit benchmark of 20% of GDV as identified in the Section 106 agreement for the masterplan development. Even after adopting our slightly increased private residential values, BNPPRE show the appraisal produces a profit of 18.11% which remains less than the benchmark profit, as such there is no surplus arising. We are therefore in agreement with BNPPRE's conclusions that the proposed scheme is currently contributing towards the maximum viable level of affordable housing.*

14.21 The assessment therefore finds that the GMV development is unviable and that the overall provision of 20% site wide, as required by the S106, is a risk to the developer and that these Plots would not be viable with any additional affordable units.

14.22 Given the confirmation from the assessor that the viability review does not generate any additional affordable housing and that the total provision is in accordance with the requirements of the S106 on a site wide basis, the proposed is considered to be acceptable.

## 15 **Amenity (for future residents and neighbouring properties)**

- 15.1 Policy 3.5 of the London Plan requires development to be of the highest quality internally, as well as externally, further noting that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meeting the changing needs of Londoners over their lifetimes.
- 15.2 Publication 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. Publication 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.
- 15.3 Core Strategy Policy H5 seeks to ensure an adequate standard of accommodation is provided to ensure satisfactory levels of residential amenity and quality of life for future occupiers.
- 15.4 The issue of noise exposure is referred to in London Plan Policy 7.15. The policy seeks to ensure that development proposals reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or within the vicinity; by separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening or internal layout; and by promoting new technologies and improved practices to reduce noise at source.
- 15.5 Core Strategy Policy E(a) seeks to avoid locating housing on site adjacent to existing problem uses, unless ameliorating measures can reasonably be taken and which can be sought through the imposition of conditions.
- 15.6 GLA's Housing SPG (March 2016, Updated August 2017) dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements. Suitable plans have been provided.
- Size of units*
- 15.7 An accommodation schedule has been provided to support the Planning Statement and Design and Access Statement. The accommodation schedule

includes details of the size of each unit. Unit types are also shown in more detail in the Design and Access Statement.

- 15.8 The unit sizes have been considered and all of the units are found to be in accordance with the National Space standards with some units exceeding the minimum standards.

*Aspect*

- 15.9 The application has been designed with 63% dual aspect and 7% triple aspect units with the remaining 30% being single aspect. There are no single aspect, north facing units in the development proposal.

*Noise*

- 15.10 The site is located adjacent to an Aggregates Zone, which comprises Angerstein and Murphy's Wharves. Therefore, there is the potential for noise from these wharves to impact upon the occupants of the proposed dwellings.
- 15.11 The planning application is supported by an acoustic, noise and vibrations report produced by Sandy Brown as per Condition 87 of the Outline Consent, which requires compliance with the six criteria in the Environmental Statement. Criteria 1 and 2 are considered using acoustic models to determine the facade noise level from the various wharf and dredger noise sources. Facade design details are then developed to meet Criteria 3, 4, 5 and 6. Full details of the criteria are set out in the Acoustic Reports produced by Sandy Brown and submitted in support of the application. The conditions attached to the outline also require additional testing be conducted prior to occupation to ensure the impact of noise is suitably considered.
- 15.12 The original scheme approved under reference I2/0022/O was designed to overcome the potential impact of noise from the adjacent aggregates sites. The approved scheme included an 11 storey terrace on the north and east sides of the site (northern and eastern terraces) to attenuate the potential noise impact from the operations to the east. This will screen noise from the operations on the Aggregates Zone (including the safeguarded wharves and Murphy's Waste Transfer Station) and aims to reduce the noise levels in the proposed development.
- 15.13 The noise impact on the development in the original scheme has been reduced by the use of strategically placed terrace buildings, appropriate layout, glazing specifications and ventilation strategies.

- 15.14 The noise report assumes a worst case scenario (i.e. the highest noise level which might occur). The report also assumes that all wharf / dredger sources operate at once given the fact that there are no restrictions in place to control the operations at the adjacent aggregates site and their operations are often based on tidal considerations.
- 15.15 As such, the proposed mitigation on the facades of the development have been informed by the results of the noise modelling from the varying noise sources. Where noise levels are above LAeq 44 dB windows of habitable rooms are to be fixed closed or to be provided with further mitigation measures to reduce noise within the limit. Non-habitable rooms will generally require fixed windows should noise levels be above LAeq 50 dB, however this will be based on the internal configuration of the property and location of non-habitable rooms in respect of habitable rooms.
- 15.16 Potential mitigation measures that may be required include: semi-enclosed balconies; fixed shut windows and additional screening to windows such as 'Juliet' additions. With these in place, all units comply with the noise criteria established by the outline consent. It should be noted that no unit is fully sealed and a suitable level of amenity is achieved for future residents. On this basis, the noise strategy is considered to protect the amenity of future occupiers in accordance with Policy requirements.
- 15.17 The requirements for each dwelling are set out within the Sandy Brown reports and demonstrate that the standards imposed by the Outline Planning Permission can be accommodated. The units are tested based on the 'as occupied' position which is based on the phasing of the masterplan and accounts for future plots. The 'as occupied' model considers buildings at Plots 101 to 109, 201, 202 to 210, 301 to 304, 503 and 504 to be in place. All of these are either consented, under construction or completed aside from Plot 503. The report has assumed that building configuration at Plot 503 to be as proposed by reserved matters application 19/4058/R. This plot forms a barrier between the entrance to Horn Link Way, the access point to the wharf operators, and Parcel 4. If the building proposed at Plot 503 was to not be delivered, the acoustic requirements for the residential units in Parcel 4 would need to be further enhanced. As such, it is necessary to secure the delivery of the building at Plot 503 that has been used in the noise testing to ensure that the mitigation proposed is sufficient to safeguard the amenity of residents. A variation to the Section 106 agreement for the masterplan is therefore proposed to restrict the occupation of Parcel 4 until the building as proposed under 19/4058/R has been delivered, in line with the acoustic testing.

15.18 In addition, it is recommended that should consent be granted a condition be imposed requiring compliance with the mitigation recommended in the Sandy Brown reports submitted with the reserved matters application. On-going testing is required in accordance with Conditions 87 and 88 also. On the basis of the above, the amenity standard in respect to noise is found to be acceptable and compliant with the requirements of the Outline Planning Permission.

*Sunlight / Daylight / Overshadowing*

15.19 A sunlight/daylight assessment has been undertaken for Plots 401-405. This provides a number of assessments including an assessment of the levels achieved for the proposed units and surrounding blocks.

15.20 A daylight/sunlight assessment was carried out as part of the ES. This was an outline assessment of the parameter massing, whereas the assessment provided for the RMA now provides a more detailed analysis.

15.21 The ES submitted with the 2012 consent stated that the following mitigation measures will be adopted: reducing the massing of the proposed blocks to allow adequate daylighting onto the proposed and existing facades; reducing the massing of the proposed blocks at the southern end, to ensure adequate levels of sunlight onto the proposed facades (16.112). The ES goes on to state that the built development that is eventually delivered will be less than the Parameter Plans indicated, as the blocks that come forward will not fill the complete envelopes as presented and tested (16.113). The impact on amenity spaces are also discussed within the ES with paragraphs 16.157 and 16.161 stating the residual impact is expected to be 'no impact'. The mitigation proposed in table 16.16 for sunlight and overshadowing includes: Reduce massing at the southern end of each plot; increase size of proposed windows, in particular those facing south; locate non-habitable rooms where sunlight levels are low; reduce massing of adjacent blocks; ensure amenity spaces are located within 30 degrees of due south; redefine size of amenity spaces to reduce overshadowing.

15.22 To address this requirement, the applicant has explained that the following measures have been employed: reduction on massing and carving away massing for additional sunlight as detailed in the Design and Access Statement; the glazing has been maximised as far as feasible to account for other matters such as overheating, privacy and energy measures; the development prioritises main habitable spaces for sunlight access, and with one exception, there are no single aspect north facing living rooms; amenity spaces have been maximised across the scheme such that available sunlight levels is maximised and the scheme introduces roof terraces which were not part of the Outline



Planning Permission to offer additional amenity space; finally whilst podium spaces have limited scope to be reorientated, the introduction of roof terraces creates additional amenity space where residents can enjoy space with more direct sunlight.

- 15.23 A further assessment has been submitted with the current proposal to show the exact impact from the detailed design. The RMA assessment shows that as a result of reduction in massing relative to the approved parameter baseline, neighbouring properties will achieve an improvement in daylight access compared to if the scheme were to be built to the approved parameter. In addition, the DSO sets out that design changes were made to the proposal in order to seek to achieve the BRE's recommended daylight/sunlight levels.

### *Daylight*

- 15.24 As set out in the Daylight/Sunlight assessment the BRE guidelines use the average daylight factor calculation (ADF). The ADF is a measure of internal daylight indicating the ratio of inside illuminance to the outside illuminance expressed as a percentage. The BRE states that daylighting in new rooms can be determined using average daylight factor (ADF) calculations. BS8206-2 Code of Practice for Daylighting recommends different average daylight factors for different habitable spaces; as follows: 1% for bedrooms; 1.5% for living rooms and 2% for kitchens. A value of 1.5% is accepted for open plan spaces such as kitchen/living/dining (KLD) rooms. Each window in a room will provide an ADF value; the value of each window are then summed to give the overall value for the room. Therefore even if an individual window is affected by obstructions to daylight, the room it belongs to may still meet the ADF target as long as there are other windows present which provide sufficient ADF.
- 15.25 The results of the testing are set out in detail in the DSO report. A total of 129 units were tested, these were taken from the first three floors as these were considered to be the worst-case dwellings and all habitable rooms from these dwellings were assessed, a total of 525 habitable rooms were therefore tested.
- 15.26 A total of 108 KLD Rooms; 28 Living Rooms and 29 Kitchen/Dinning Rooms were tested. All of the KLD rooms and the living rooms tested achieved at least 1.5% ADF with 93 of the KLD rooms achieving 2% ADF. A total of 3 of the Kitchen/Dinning spaces failed to meet the 2% ADF, two of these achieved at least 1.5% and the other achieved 1.38% and therefore was only slightly below. A total of 360 bedrooms were assessed against the requirement of 1% ADF, of these 346 passed and 14 failed. Some of the units do fail quite

significantly with resulting ADF values of 0.04%, 0.12%, and 0.15% as examples. The applicant has explained the failures are a result of the requirement for private external amenity space and that daylight provision has been maximised as far as feasible. Given that the majority of units meet the BRE requirements and that only a small number of units are affected, on balance the proposal is considered acceptable in this regard.

15.27 In addition to the tests within the proposal, a series of tests have been carried out on neighbouring properties to establish the impact on amenity. The methodology for these tests is as follows:

**Daylight to Surrounding Windows:** A plane is drawn at 25 degrees from the horizontal, at the centre of an existing window. If the new development intersects with this plane, the internal daylight levels of the surrounding windows may be reduced. When an obstruction of the 25-degree plane occurs, a more detailed assessment involving the Vertical Sky Component of the affected window would need to be carried out.

**Absolute Vertical Sky Component (VSC):** The Vertical Sky Component is the ratio of the direct sky illuminance falling on the vertical wall at a reference point, to the simultaneous horizontal illuminance under an unobstructed sky. To maintain good levels of daylight, the Vertical Sky Component of a window needs to be 27% or greater. If the VSC is less than 27%, then a comparison of existing and proposed levels of VSC level would need to be calculated.

**Relative Vertical Sky Component:** Good levels of daylighting can still be achieved if VSC levels are within 0.8 of their former value. The former value in this case uses the maximum permitted massing as the baseline; where the relative VSC levels of above 1.0 are achieved, these represent an improvement over the baseline condition with the maximum massing heights permitted in place.

**Average Daylight Factor:** Where the room layouts and internal reflectance data are known, average daylight factors for existing properties can be calculated and assessed against the BRE targets. Satisfactory levels of daylight can be expected where the following BRE targets are being met: 2.0% for rooms with kitchens only; 1.5% for kitchen, dining and living rooms; and 1.0% for bedrooms.

15.28 The results of these tests are as follows:

<b>Building</b>	<b>Total Windows</b>	<b>Windows passing the 25° initial test</b>	<b>Windows with a VSC higher than 27%</b>	<b>Windows with a VSC of at least 1.0 of baseline value</b>	<b>Windows that belong to rooms meeting the ADF test</b>
Farnsworth Court	68	15	22	27	4
Kilby Court	22	0	5	17	0
Cottrell Court	21	0	9	12	0
Moseley Way	13	0	4	9	0
Plot 303 H	66	47	12	7	0
Plot 302 D	88	0	46	42	0
Plot 302 B	12	0	0	12	0
Plot 302 A	32	0	7	25	0
Plot 301	122	0	1	102	19
<b>Total</b>	<b>444</b>	<b>62</b>	<b>106</b>	<b>253</b>	<b>23</b>

15.29 As can be seen, a total of 444 windows were tested to establish the impact on surrounding properties. Of these, 62 passed the 25 degree test; 106 had a VSC higher than 27% and 253 achieved a relative VSC value of at least 1.0 against the baseline value which represents the Outline Massing. A total of 23 windows did not meet these tests, 4 in Farnsworth Court and 19 in Plot 301. All of these windows are in rooms that meet the ADF test. As such, the impact on daylight of neighbouring properties is considered to be acceptable.

### *Sunlight*

15.30 The term ‘annual probable sunlight hours’ refers to the long-term average of the total of hours during a year in which direct sunlight reaches the unobstructed ground and a dwelling will appear reasonably sunlit provided: at least one main window faces within 90 degrees due south and the centre of at least one window to a main living room can receive 25% of annual probable sunlight hours (APSH), including at least 5% of annual probable sunlight hours in the winter months (WPSH) between 21 September and 21 March.

15.31 A sunlight access assessment has been carried out on the south facing living rooms in the proposal as per the BRE guidelines. This equated to 114 rooms, of which 72 have at least one south facing window achieving APSH greater than 25% and WPSH greater than 5%. Of the remaining 42, a total of 23 have at least one south facing window achieving either an APSH greater than 25%

(8 rooms) and WPSH greater than 5% (15 rooms). Of the remaining 19, 7 are served by a window facing within 90 degrees due south which feed directly onto a private amenity space either with a balcony situated overhead or as part of a recessed balcony resulting in a reduction in the levels of sunlight and the remaining 12 are only served by a single window facing within 90 degrees due south which is predominantly west-facing onto the internal courtyard. Given the fact that the majority of the units pass and the massing has already been allowed by the outline planning consent, the proposal is considered acceptable in this instance.

15.32 There is one window that receives 0 APSH/WPSH however this window serves a hallway area and other windows serving the space comply with the BRE criteria. On balance, this is therefore considered acceptable.

15.33 In addition, the applicant has assessed the impact on the surrounding properties. A total of 306 windows from surrounding buildings were tested to understand the impact of the proposal. Of these, 50 passes the 25 degree test and 251 were south-facing windows with APSH greater than 25% and WPSH greater than 5%, or a value of at least 1.0 against the baseline value which represents the Outline Massing. Four windows did not meet these criteria; 3 windows served rooms which had another window that met the BRE criteria for annual sunlight and 1 was connected to a balcony that has access to a reasonable level of sunlight. As such, the impact is considered acceptable.

### *Overshadowing*

15.34 The BRE states that for an amenity space to “appear adequately sunlit throughout the year, at least half of the area should receive at least two hours of sunlight on 21<sup>st</sup> March.

15.35 The roof terraces and communal podium areas have been tested to generate a combined figure to show the total amenity space within each plot that achieves 2 hours of sunlight on the 21<sup>st</sup> March. The neighbourhood square has also been tested. The results of which are as follows:

Area Tested	Total Amenity Space (m2)	Area achieving 2 hours sunlight on 21 <sup>st</sup> March	Percentage achieving 2 hours sunlight on 21 <sup>st</sup> March (Proposal)	Percentage achieving 2 hours sunlight on 21 <sup>st</sup> March (Outline)
Plot 401	1,031	440	43%	6%
Plot 402	747	374	50%	0%

Plot 403	1,126	492	44%	0%
Plot 404	901	461	51%	0%
Plot 405	747	373	50%	0%
Neighbourhood Square	1,016	465	46%	18%

15.36 As can be seen, 3 of the 5 residential plots achieve the 50% requirement with the remaining 2 plots only slightly falling below the 50% target, achieving 43% (Plot 401) and 44% (Plot 403). The neighbourhood square also falls slightly below this requirement, achieving 46%. Given the vast improvement against the outline massing and that the failings are only slightly below, no objection is raised.

15.37 With regard to overshadowing of amenity spaces outside of Parcel 4, the proposal has the potential to impact the open space located at Plots 501-502 as proposed under 19/4058/R and the central podium space at Plot 301 which is now under construction. The testing undertaken as part of this application demonstrates that the proposed development will not impact the open space at Plots 501-502. If built to the maximum parameters, a total of 13% of podium amenity space would achieve more than 2 hours of sunlight on the 21st March and this was the position as consented by 19/2055/R. With the reduction in massing as proposed, a total of 21% of this space achieves more than 2 hours of sunlight on the 21st March resulting in an improvement against the previously consented reserved matters position. As such, whilst this is below the BRE guidance of 50%, the proposal improved upon the outline baseline and therefore no objection is raised.

*Privacy / Overlooking*

15.38 Standard 28 of the Mayor's Housing SPG requires design proposal to demonstrate how habitable rooms provide adequate privacy from neighbouring properties, the street and public spaces. The SPG further states in the supporting text that rigidly applying the 18-21m separation distance can limit the variety of urban spaces and can sometimes unnecessarily restrict density, although noting that this is a useful yardstick and a reduction against this separation distance must be carefully considered (in terms of placement of windows, habitable/non-habitable room configuration etc.). The proposed has a minimum separation distance of 15m between plots. Whilst this is below the separation distance recommended as a guide within the SPG, the block arrangement is consistent with that consented under the outline consent.

15.39 In regard to the distance from the proposed site to the nearest point, the proposal is approximately 15m from Plot 301, 16.5m from Plot 302 and 98m to Plot 503 which is a non-residential building. The proposed is well within the SPG's guidelines. Notwithstanding this, the proposal occupies the same footprint as consented by the Outline planning permission and therefore the location of the plots in relation to one another has been accepted.

15.40 Overall it is not considered that the proposed gives rise to a loss of amenity from overlooking and the proposal is consistent with the consented massing.

*Private amenity space*

15.41 Each unit has private amenity space in the form of balconies or terraces. The private amenity spaces all measure to accord with the London Housing Design Guide, which requires a minimum of 5 sqm per 2 persons, with 1sqm added per additional person. The required minimum width and minimum depth for all balconies and other private external spaces is 1500mm.

15.42 It is considered that sufficient private / public amenity space is provided.

*Fire Safety*

15.43 A Fire Strategy has been submitted as part of the application. The report has been prepared by CaWSP on behalf of GMVL, the report was prepared by a consultant with the following qualifications BEng(Hons), IEng, FIFireE, IFSM to detail the fire safety strategy for Plots 401-405 in accordance with Publication London Plan policies and Building Regulations. The report details how the scheme has been designed and will operate in accordance with Publication London Plan Policies D5 and D12.

**16 Landscaping / Public Amenity Space / Communal Space**

16.1 Policy OS4 of the Core Strategy requires that new development enhances 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.

16.2 Policy 5.10 of the London Plan requires development integrate green infrastructure to be incorporated in the design process to contribute to the Mayor's aim for 'urban greening'. Policy 7.19 requires a 'proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy' the policy goes on to list the considerations for planning decisions to achieve this strategic

aim. Policy G1 in the Publication London Plan also requires green infrastructure to be fully integrated into new developments.

- 16.3 Policy E(f) of the Core Strategy and Policy 5.11 of the London Plan provide additional detail in terms of requirements for living walls/roofs.

### *Trees*

- 16.4 An Arboriculture Report has been submitted in support of this application. The report assesses the impact of the proposal on the existing landscaping. The Arboricultural Impact Assessment identifies that within the application site there are two groups of Foat Willows (TG1 and TG2) and an Acer (T9) that need to be removed to facilitate the development. All of these are identified in the report as BS Category C1, which is described, as 'Those trees of low quality and value: currently in an adequate condition to remain until new planting could be established (> 10 years)'. Two additional Sorbus trees (T3 and T4) are to be removed from Bugsby's Way as these were found to be dead and therefore are to be removed on health and safety grounds. The report suggests a condition be imposed to secure on-going protection of trees during the construction works and to ensure the future landscaping proposals take account of these trees. It is recommended that this be imposed should members be minded to permit the application.
- 16.5 The proposal includes 180 new trees to be planted across the Parcel, creating a net uplift in planting. A mixture of native tree trees, woodland planting, pollinator species including hedge planting and shrubs and wildflower meadow pockets are proposed. The internal streets include six different variety of species and the woodland areas and the green link include additional native planting. Details of the tree types and locations can be found in the landscaping report produced by Turkington Martin and full details shall be required by condition.

### *Neighbourhood Square*

- 16.6 In the centre of Parcel 4, the application proposes a neighbourhood square. This has been designed as a community space for the enjoyment of residents and shall include some play equipment, such as a table-tennis table. The square centres around a rectangular lawn, measuring 12m by 14m with hard landscaping forming the perimeter. Steps leading up to the podium of Plot 401 are proposed as 'sculptural steps' offering additional seating. Over the top of the steps is a pergola which may offer the opportunity for plants to grow over the top and add further visual interest to the area.

### *Green Link*

- 16.7 The north-south access road from West Parkside runs along the eastern boundary of Plot 402 and 405 forms part of the 'green link'. This landscaping feature seeks to maximise planting on street to extend the character of the swale in Parcel 2 to the north. The planting will include native trees, shrubs and ferns and a series of rain gardens are proposed which help drain surface water run-off as well. The rain gardens will also include seating and ecological features such as pebble channel, insect hotels, boulders and stumperies.

### *Street Landscaping*

- 16.8 Tree planting is primarily designated at road junctions. Substantial tree and shrub planting is proposed along Southern Way. Opportunities for vertical planting to blank facades is also proposed along Southern Way. A landscape buffer is proposed on the southern boundary of Parcel 4 along Bugsby's Way. This shall entail substantial, dense planting made up of native species. There is also a level change from Bugsby's Way to the residential area and this shall be accommodated with a planted slope with a low retaining wall. Native wildflower pockets are proposed to further enhance the landscaping along this buffer.
- 16.9 The southern border will also incorporate a row of perpendicular parking. This does detract from the visual quality of the landscaping but has been reduced through the 2019 S73 amendments against the original parking requirements of the masterplan. Given that this was an accepted feature of the outline consent, no objection is raised. Parking bays are proposed along the internal streets, the locations of which have been designed to be close to entrance lobbies.
- 16.10 Different materials shall be used across the hard landscaping to establish pedestrian spaces against spaces which allow vehicular access. The materials palette reinforces the street hierarchy making a distinction between the 'internal' streets and the principle access roads with concrete block paving proposed on the principle access roads and clay paviors proposed on the internal streets. The neighbourhood square is also proposed with clay paviors matching the internal streets but the space is to be marked with a change of colour. Concrete block paving to footways.
- 16.11 Defensible space is proposed along the ground floor of all blocks to safeguard residents, this shall include a brick wall to create a solid boundary and planted boundary edges.



### *Podiums and Roof Terraces*

- 16.12 Communal podium amenity spaces are proposed at the centre of each block. These spaces are for use by the residents in that block only. At the heart of each garden is an open lawn area which accommodates informal play and seating. More intimate social spaces are created to the edges of the landscaping. These areas include formal play spaces also and this is described further in Section 17 of this report.
- 16.13 The planting extends out to the edges of the first floor podiums at a number of locations. Areas for sitting are proposed in this locations to offer the enjoyment of views down into the streets and towards the neighbourhood square. Tree planting has also been specifically located close to the podium edges so as to be readily visible from the street, contributing to the quality and character of the public realm.
- 16.14 All units that sit flush with the podium will have direct access onto this space and defensible space is provided to retain privacy. Defensible space is also proposed to safeguard the amenity of residents with private amenity spaces on the podium.
- 16.15 Trees shall also be planted across the podium spaces along with shrub planting and areas of lawn turf. All tree planting will be native and a substantial proportion of the shrub and perennial planting will be native and/or pollinator species. Invertebrate habitats will be supported with the integration of 'insect hotels', which will be attractive design elements and 'Stumpers' which have both habitat and play value.
- 16.16 Communal roof terraces are proposed at the 4th, 5th or 6th levels of each plot. The terraces provide informal social and amenity spaces with views out over the surrounding neighbourhood. Each terrace is predominantly planted, with planting accommodated in a low planter which frames the terrace. The planting encloses smaller social spaces with fixed seating. The roof terraces will be accessible to residents that are located within the same core as the amenity space.
- 16.17 Each plot is also proposed with biodiverse roof planting on all non-amenity roof space combined with the PV panels.

### *Urban Greening Factor*

- 16.18 London Plan Policy 5.10 and Policy G5 of the draft London Plan 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. The Urban Greening Factor (UGF) provides an assessment of design proposals in relation to the quantity and functionality of urban greening. The draft London Plan recommends a target score of 0.3 for predominately commercial development and 0.4 for predominately residential developments.

16.19 In line with draft London Plan requirements, the site has been assessed to establish its urban greening factor. The scheme achieves 0.27 / 0.4. This has been calculated as follows:

Green Infrastructure (UGF Score) – Area

- Semi-natural planting (1) – 1106m<sup>2</sup> Ground Level
- Intensive green roof planting (0.8) – 955m<sup>2</sup> Podium Level
- Flower Rich Perennial Planting (0.7) - 470 m<sup>2</sup> Ground Level
- Swale Planting (0.7) - 107m<sup>2</sup> Ground Level
- Bioiverse green roof (0.7) - 5513 m<sup>2</sup> Roof Level
- Hedge Planting (0.6) - 11 m<sup>2</sup> Ground Level
- Ground Cover Planting (0.5) - 93 m<sup>2</sup> Ground Level
- Amenity Grass (0.4) - 160 m<sup>2</sup> Ground Level and 582 m<sup>2</sup> Podium Level
- Standard Trees (0.8) - 2229m<sup>2</sup> Ground Level and 557 m<sup>2</sup> Podium Level
- Permeable paving (0.1) - 709 m<sup>2</sup> Ground Level and 1349 m<sup>2</sup> Podium Level

16.20 Therefore the urban greening factor would score the following  $(1 \times 1106) + (0.8 \times 955) + (0.7 \times 470) + (0.7 \times 107) + (0.7 \times 5513) + (0.6 \times 11) + (0.5 \times 93) + (0.4 \times 742) + (0.8 \times 2786) + (0.1 \times 2058) = 0.36$

16.21 Whilst an urban greening factor of 0.36 against a target of 0.4 is below the policy requirements of the Publication London Plan, the applicant is constrained by the parameters of Outline Planning Permission which predates this policy requirement and the proposal has sought to maximise provision whilst balancing the various onsite requirements, falling just below the 0.4 target. As such, on balance, the scheme is considered acceptable.

### *Conclusion*

16.22 On the basis of the above, it is considered that the landscaping, public open space and communal open space is acceptable in the context of the outline planning permission.

## 17 Child Play space

- 17.1 Policy 3.6 of the London Plan and Policy S4 of the Publication London Plan requires development to include provision for play and informal recreation based on expected child yield to ensure as safe and stimulating play facilities are essential for a child's wellbeing, health and future development. The requirements for this are further elaborated on within the Mayor's Play and Informal Recreation SPG. Core Strategy Policy H(e) states 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.
- 17.2 The requirements for play space and informal recreation were established at outline stage. Parameter Plan 2368-MP-015 Rev 02 shows the landscape and public realm plan that was consented as part of the masterplan, which the reserved matters application must adhere to. The Landscaping Design Statement includes a site wide breakdown of the play provision across the masterplan. It is noted that 7,766sqm is provided for children between 0-10 years old. This is beyond the required 6,936sqm required by the GLA's play space calculator for the same age group. A further 2,135 sqm is required for children aged 11-17 years old. This is catered for in Southern Park.
- 17.3 Based on the GLA's Play Space Calculator, this reserved matters application requires a total of 2,645 sqm of play space. The applicant proposes a total of 1,813 sqm within Parcel 4. This is made up of 1,439 sqm of doorstep play and 374 sqm of local play for older children. As noted above, the application is located adjacent to Southern Park and the Outline Planning consent envisaged a portion of play to be off-site. This makes up the remaining 836sqm.
- 17.4 The play space across Parcel 4 is proposed within the communal podium spaces (doorstep play) and in a central neighbourhood square (local play). It is noted that all residents within the relevant plot have access to the central podium to ensure access is provided to all residents. The neighbourhood square will also be accessible to other residents in the masterplan and members of the public.
- 17.5 The Landscape Design Statement notes that the type of play features proposed has taken account of the changing guidance on fire risk and the requirements imposed by NHBC in relation to the type of materials which can be used on podium landscapes. The podiums include pre-cast concrete play pebbles, living willow tunnels, pre-cast concrete sitting steps, natural stone boulders, marbles table, 'four in a row' panel game and a Kaleidoscope / Telescope. Full details of the play equipment are to be provided pursuant to Condition 16 of the outline consent.

## 18 **Biodiversity**

- 18.1 Paragraph 8(c) of the NPPF sets out the environmental objective of the Framework in terms of achieving sustainable development and includes ‘helping to improve biodiversity’,
- 18.2 Paragraph 170 of the NPPF, states that the planning system should contribute to and enhance the natural and local environment and lists several ways this should be done. These include minimising impacts on biodiversity and providing net gains in biodiversity where possible
- 18.3 Paragraph 175 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying several principles which the paragraph goes on to list.
- 18.4 Paragraph 180(c) states that planning decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 18.5 Policy 7.19 of the London Plan (Biodiversity and access to nature) states that wherever possible, development should make a positive contribution to the protection, enhancement, creation and management of biodiversity
- 18.6 Policy DHI of the Core Strategy states that all developments are expected to enhance biodiversity consistent with the Greenwich Biodiversity Action Plan.
- 18.7 Policy OS4 of the Core Strategy states that the Royal Greenwich's rich biodiversity and geodiversity will be protected, restored and enhanced.
- 18.8 Policy OS(f) states that development proposals will be expected to take account of ecological factors, paying attention to the need for: Consideration of the biodiversity and geological features of the site and the surrounding area, including protected species (Refer to Policy OS4). These features should be respected, and the area’s natural character enhanced. An appropriate level of surveying is required to enable decisions to be made about the existing trees on the site and to ensure that landscaping schemes include environmentally appropriate planting using locally native species and demonstrate appropriate irrigation plans for landscaping.
- 18.9 The supporting text for Policy OS(f) further states that where development is proposed on sites adjacent to protected SINCs, applicants must demonstrate that habitats will not be adversely affected.

- 18.10 A Landscape Design Report prepared by Turkington Martin Landscape Architects has been submitted along with an Updated Phase I Habitat Survey and Ecology Assessment produced by Ramboll. The site contains semi-improved grassland, introduced shrubs and scattered tree habitats. Such habitats are suitable for nesting birds, use by invertebrates, and foraging bats. The site was not found to be suitable for hibernating or roosting bats, no evidence was recorded of reptiles, great crested newts or badgers, and the report found that it was unlikely that amphibians would be present on this part of the site. Based on these findings, the Ecology Assessment finds that the site is of Site Level importance for ecology.
- 18.11 Plot 301 to the north of Parcel 4 did include an overshadowing assessment which found that no area in Southern Park would be in permanent shade. As Parcel 4 is then further from the SINC and set behind other plots it was concluded that no further overshadowing surveys were required to assess the impact. Notwithstanding this, the conditions attached to the Outline Planning Permission only required additional testing for Plots located in Parcel 2.
- 18.12 The report requires that clearance of on-site vegetation with the potential to support nesting birds, i.e. any of the vegetation along the northern boundary, must be undertaken between September and February inclusive (outside the bird nesting season).
- 18.13 The landscape proposals include native woodland and woodland edge accommodated within 'rain gardens', podium gardens, native planting, insect hotels, and stumperies which support invertebrates. The rain gardens assist with reducing the risk of flooding by absorbing the surface water run-off from the adjacent carriageways. A 'green link' is also proposed to create a link with the ecology park and eco-swale, to the north, with the boundary woodland planting along Bugsby's Way to the south. The green link will include ecological features to enhance the biodiversity benefits on site. Opportunities for vertical planting blank facades has also been proposed. Full details of this will be required by condition. Biodiverse green roofs are provided to all available areas of non-amenity roof area. Bat and bird boxes are also proposed as part of the development.
- 18.14 The impact on biodiversity has been considered and has been found to be acceptable.

## 19 **Sustainability and Energy**

- 19.1 The NPPF supports proposals for improvements to environmental sustainability. Paragraph 11 placing sustainability at the heart of the NPPF, with the presumption in favour of sustainable development. As noted in paragraph 8, sustainability is considered to be three dimensional; environmental sustainability forming one part of this along with economic and social sustainability.
- 19.2 Chapter 14 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) elaborates on this. Paragraph 148 requires planning authorities to plan for new development in locations and ways which reduce greenhouse gas emissions.
- 19.3 The London Plan is consistent with the aims of the NPPF, with Policy 5.1 setting out the strategic overview for London stating that “the Mayor seeks to achieve an overall reduction in London’s carbon dioxide emissions by 60 per cent (below 1990 levels) by 2025”. Policy 5.2 goes on to set out how planning decisions should be made to ensure carbon dioxide emissions are minimised; requiring that development “make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy: be lean (use less energy); be clean (supply energy efficiently) and be green (use renewable energy)”.
- 19.4 Chapter 4.6 of the Core Strategy is also consistent with the aims of the NPPF and discusses Environment and Climate Change. Policy EI “supporting the incorporation of renewable energy generation within development proposals (Be Green)”.
- 19.5 A condition was attached to the outline application requiring that the renewable energy technologies on site shall provide no less than 18.5% on-site CO<sub>2</sub> reduction and details of the renewable energy technologies shall be provided to the Local Planning Authority prior to the implementation of the development (condition 64). The condition was amended under the 2019 S73 to further state that reasonable endeavours to achieve zero carbon standard on site should be taken through implementation of high efficiency systems (e.g. state of the art PV panel models) and innovative technologies in the interest of maximising on-site CO<sub>2</sub> reductions, to be evidenced with each subsequent reserved matters application.

### *Be Lean*

- 19.6 A range of energy efficiency measures are proposed that improve upon the notional BR requirements including improved U-Values and air permeability, 100% low energy lighting internally and externally, mechanical ventilation with heat recovery (MVHR) and passive ventilation through windows with free areas for the majority of the dwellings, shading in the form of overhang balconies and solar control glazing with internal blinds and g-values of 0.4 for all the east, south and west facing glazing and 0.63 for all north facing glazing to minimise solar gains.
- 19.7 Measures to reduce the unregulated load have been also identified in the strategy including energy efficient white goods for private dwellings and EU Energy Efficiency Labelling Scheme Leaflet and smart meters for all dwellings.
- 19.8 These measures predict an annual reduction in regulated CO<sub>2</sub> emissions of 39 tonnes, equivalent to 5.5%, beyond the compliant Building Regulations Part L 2013 base case.

### *Be Clean*

- 19.9 The proposed dwellings will connect to the site wide District Heat Network (DHN) served by 1.6MWe gas CHP of 85% efficiency to provide 66% of the space heating and hot water and top up boilers of 85% efficiency to cover the remaining demand. The energy centre for this DHN is located at Block 504 at the south-eastern part of the GMV masterplan for Phases 3, 4 and 5. The network that is supported by thermal storage will operate on circa 80/40°C flow and return temperature in line with the CIBSE Heat Networks Code of Practice. In line with the report, the network heat losses are 15%. The CHP system predicts an annual reduction in regulated CO<sub>2</sub> emissions of 330.5 tonnes, equating to 49.2%, beyond the Be Lean case. The DHN at Plot 504 is not yet operational and therefore a condition will be attached to this reserved matters consent to require the development to be connected and the energy centre to be operational prior to occupation to ensure the energy saving measures set out in the submission documents are achieved.

### *Be Green*

- 19.10 A number of renewable technologies has been investigated in terms of technical, physical and financial feasibility, with Solar PV panels found to be appropriate for Plots 401-405 of GMV. The 197.3kWp solar PV is designed to reduce the annual regulated CO<sub>2</sub> emissions by 23%, equivalent to 77.9 tonnes CO<sub>2</sub>, beyond the Be Clean case. It is noted that the proposed PV provision on Parcel 4 will meet the renewables target for Plots 401-405, and also

contribute to meeting the renewable target for Parcel 5 (Plot 503) where there is limited roof area for implementation of photovoltaics. An indicative roof plan showing the location of the solar PV panels on Parcel 4 has been provided.

#### *Cumulative Savings*

- 19.11 The combination of the proposed passive design measures, connection of the residential units to the site wide DHN served by 1.6MWe gas CHP and gas boilers and 197.3kWp solar PV predict an annual reduction in regulated CO<sub>2</sub> emissions of 447.33 tonnes equating to 62.9% beyond Building Regulations Part L 2013 compliant case.

#### *Carbon Off-set Payment*

- 19.12 The original outline planning permission did not include the requirement for a carbon off-set payment to be required in the S106 as it was not a policy requirement at that time. Given the policy changes, this was included in the 2019 amendment to the legal agreement. Given the viability constraints of the development, this shall be triggered should the viability assessment submitted at reserved matters stage show a surplus beyond the minimum 20% affordable housing provision to ensure this obligation is unaffected. The applicant has provided an addendum to the Energy Strategy which shows that following the savings on site detailed above there is a remaining 263.7 tonnes of CO<sub>2</sub> per year, which would be required to be offset through carbon offset contributions. This would be the equivalent of a financial contribution of £474,660.00. The viability assessment however does not identify a surplus and therefore this requirement is not triggered.

#### *Overheating*

- 19.13 A number of additional passive design measures, in addition to those stated above, have been assessed over a representative sample of 85 habitable spaces and 2 heated communal corridors located on the lower, middle and top floors and of different orientations and acoustic requirements to reduce the risk of overheating including insulation of the distribution network in line with CIBSE CoPI guidance and minimisation of the lateral pipework lengths in the corridors, natural and mechanical ventilation of 20 l/s for the corridors with opening free areas of 30%.
- 19.14 All residential units without acoustics restrictions will have openable windows and sufficient passive measures to mitigate the overheating risk.



- 19.15 Habitable rooms with significant acoustic restrictions and sealed glazing will have ASHPs installed to provide comfort cooling in order to maintain thermal comfort. Once the system is installed, the occupants will have the option to switch it on with independent controls to maintain desirable temperatures within the space.
- 19.16 The results showed that all habitable spaces tested under CIBSE TM59 criteria and 2020 weather file, high emissions, 50% percentile scenario pass the criteria with an open area of 40% for bedrooms and 50% for kitchens/living/dining rooms and active cooling. All corridors pass criterion I of CIBSE TM59 with 30% glazing free area and 20l/s ventilation fans.
- 19.17 Two measures were investigated under the more extreme weather scenarios including lower g value for the windows and internal blinds. The results demonstrated that the majority of the habitable spaces within the dwellings fail to pass criterion I of CIBSE TM59 under CIBSE TM49 DSY2 and DSY3 weather files. Compliance with these more extreme weather scenarios is not required; however, the applicant will be required to demonstrate that they have sought to maximise compliance with DSY2 and DSY3 where possible.

#### *Sustainable Design and Water*

- 19.18 According to the Sustainability statement, dwellings will aim to meet a water consumption target less than or equal to 105 litres/person/day, in line with Policy 5.15 of the London Plan (Housing Standards Minor Alterations 2016). Details of this are to be provided in accordance with condition 63 of 19/1545/MA. A rainwater collection system is also proposed for external irrigation of the podium landscaped areas on all Plots.
- 19.19 The the development is expected to achieve Code for Sustainable Homes Level 4. The application includes a pre-assessment to support this position and full details will be provided pursuant to Conditions attached to the outline consent
- 19.20 The proposal also commits to using materials that comply with the BRE's Green Guide to Specification targeting rating of A+ to C. the applicant states that it will not be feasible to achieve a Green Guide rating of A to C to one floor type - this relates to the in-situ upper floor type with a screed top in the apartment building. This is mainly due to lack of suitable suppliers of in-situ upper floor type with a screen top material. Aggregates from the demolition of any existing hard surfacing/landscaping on site will be used where appropriate to reduce the environmental impact of in-situ concrete on site. Full details are required by conditions attached to the outline consent.

## *Conclusion*

19.21 The Sustainability Officer has reviewed the submission documents and found the information to be acceptable subject to further information being submitted pursuant to Conditions attached to the Outline Planning Permission and the additional imposition of conditions on this reserved matters application.

## **20 Impact on Transport and Infrastructure**

20.1 Policy 6.3 of the London Plan requires a full assessment of a proposals impact on the transport network; requiring that development does not adversely impact on safety. Policy IM(b) of the Core Strategy and Policies 6.9 and 6.10 of the London Plan set out the consideration for walking and cycling in new development and Policy IM(c) of the Core Strategy and Policy 6.13 of the London Plan set out the requirements for parking provision. Policy 6.13 of the London Plan requires that proposals include provision for the needs of businesses for delivery and servicing. Policy 6.13 sets out the requirements for parking in London. The policy is supported by Table 6.2 which sets out the maximum standards taking account of density and PTAL rating.

20.2 Policy 6.10 of the London Plan places great emphasis on the aim to increase walking in London. To achieve this, the policy requires decision makers take account of the quality of the pedestrian environment, taking account of Transport for London's Pedestrian Design Guide. Policy IM(b) includes a requirement for promoting safety to pedestrians and cyclists. The Mayor's key target, as now set out in Publication London Plan Policy T1 is that 80% of all trips in London are to be made by foot, cycle or public transport by 2041

20.3 As noted, the outline consent included a general overview of the parking strategy (Drawing Number: 2368-MP-014 Rev P02). Due to land contamination issues, there is no ability for basement parking to be provided in GMV. S106 Appendix 7 paragraph 2 states: Of the total car parking spaces for the Development (34% of Dwellings) 10% will be disabled spaces and will be allocated to persons with a valid disability permit.

20.4 The breakdown of car parking spaces in each plot is as follows:

<b>Plot number</b>	<b>Total Spaces</b>	<b>On-Street</b>	<b>Blue Badge</b>
Plot 401	25	15	3
Plot 402	10	17	3
Plot 403	17	19	3
Plot 404	16	25	6

Plot 405	9	27	3
Total	77	99	18

- 20.5 There are an additional 50 car parking spaces along the southern edge of the masterplan adjacent to Bugsby's Way. Of these, 5 are blue badge parking bays to create a total of 23 blue badge spaces across Parcel 4.
- 20.6 A total of 226 car parking spaces are provided within Parcel 4. There are 489 units proposed giving a ratio of 0.46:1. The Outline Planning Permission requires a masterplan ratio of 0.34:1. A total of 595 car parking spaces are proposed/consented site wide creating a ratio of 0.34:1 as required. The total number of spaces site wide is 717 which includes 30 Yacht club, 12 Car Club, 33 Commercial and 43 Public Highway+ 4 Visitor spaces.
- 20.7 Across the car parking spaces, 16 are proposed as active Electric Vehicle Charging Points (20%) and an additional 16 are proposed as passive Electric Vehicle Charging Points (20%). The active spaces are to be provided from the outset and the passive spaces are designed to cater for future demand. Car parking spaces are sold to residents as a right to park rather than allocated a space directly.
- 20.8 The proposal includes a total of 950 cycle parking spaces. The breakdown of this is as follows:

Plot number	Long Stay	Total Required
Plot 401	200	207
Plot 402	183	187
Plot 403	181	192
Plot 404	198	200
Plot 405	188	190
Total	950	976

- 20.9 This does not meet the requirements of the condition attached to the Outline Planning Permission, as seen from the above. However the applicant has advised that an updated schedule will be provided to resolve this. This will be reported on an addendum.
- 20.10 The long-stay spaces are located in a dedicated storage area on the ground floor of the proposal and are accessed from the car parks or externally. This accords with Policy 6.9 of the London Plan. An additional 4 spaces are provided per plot for short- stay spaces and these are provided as Sheffield Stands and are located externally within the public realm.

- 20.11 Vehicles are unable to enter or exit the masterplan from Southern Way which is a bus route only. There are two-way streets throughout parcel 4, with the exception of the central square, which is one-way from north to south, and the road between plots 404 and 405. There are no formal cycle routes within the GMV masterplan other than those that already exist on public highways / park / Thames Route; the site employs shared access for pedestrians, cyclists and vehicles. Hard landscaping is used to delineate between vehicular areas and pedestrian areas.
- 20.12 The Aerodrome Safeguarding Map shown in Figure 8 of Policy IM(d) indicates the outer safeguarding boundary for the airport, in terms of proposed building heights that must be referred to the Civil Aviation Authority. The proposal falls within the area for which development over 15 meters must be referred to London City Airport. London City Airport have raised no objection to the application subject to the inclusion of conditions, these will be imposed on the consent should permission be granted.

## 21 **Air Quality**

- 21.1 Air Quality was fully considered with the outline planning permission as part of the Environmental Statement. The proposed is consistent with the outline consent, with only minor variations.
- 21.2 The reserved matters application is supported by a letter from Ramboll (dated 22.11.2019) that finds that there are no new environmental impacts or effects that would arise over and above those previously assessed in the 2011 Environmental Statement.

## 22 **Waste**

- 22.1 Policy 5.17 of the London Plan seeks to minimise waste and 'achieve high reuse and recycling performance' and requires suitable waste and recycling storage on all new developments.
- 22.2 Each block contains at least one refuse storage facility on the ground floor. Plots 401-404 each contain two storage spaces and Plot 405 contains one. Access can be gained to each storage space either externally, for collection, or internally, for residents to deposit waste. Details of the internal bin arrangements can be seen on plan including the location of the bulky waste storage areas.
- 22.3 Full details of the refuse and recycling storage is required to be submitted and approved under Condition 35 of the outline planning permission prior to the commencement of the development.

22.4 The strategy proposed as part of this application is considered acceptable with further detail due under the submission of conditions. The information has been reviewed by the Waste Service team and has been found to be acceptable subject to final details being submitted to discharge the Conditions attached to the Outline Planning Permission.

### 23 **Areas of High Archaeological Potential (AHAPs)**

23.1 The application site is located within an area of high archaeological potential (AHAPs), as such Policy DH(m) “expect applicants to properly assess and plan for the impact of proposed developments on archaeological remains”. The outline consent was granted subject to a condition requiring such an assessment be undertaken and provided to the LPA for review (condition 27). An application was made for submission of details pursuant to this condition (ref: 12/2314/SD). This was approved in 25/10/2012 for the whole of the GMV site. It is therefore not considered necessary for such details to be subsequently provided at this stage.

### 24 **Flood Risk**

24.1 Paragraph 155 of the NPPF requires consideration of flood risk and states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere”. Policy E2 of the Core Strategy sets out the Royal Borough’s Strategic Flood Risk Assessment and Policy 5.12 of the London Plan, is in line with the NPPF in its consideration of Flood Risk Management for new development. The site is not designated as having a residual flood risk as set out in Policy E3.

24.2 The site is located within Flood Risk Zone 3 – Area benefiting from flood defences. The proposal complies with the drainage and land use strategy approved by the Outline Planning Permission. The scheme is therefore considered to be acceptable.

24.3 Condition 37 of the Outline Planning Permission also requires the minimum finished floor level of any building on the site will be no lower than 3.3 m AOD and the finished floor level of bedrooms will be set no lower than 4.3 m AOD and 4.66 m AOD for Plots 4 and 5. Details to demonstrate compliance with this condition are required to be submitted and approved prior to the commencement of the development.

## 25 Legal Agreement

- 25.1 The application is a reserved matters application and therefore the proposed development has already been the subject of a legal agreement in terms of the Outline Planning Permission.
- 25.2 The S106 Agreement dated 30th March 2012 for the Outline Planning Permission (Ref 12/0022/O) secured the following obligations:
- provision of 20% affordable housing across the outline scheme with a 70:30 split in favour of affordable rental units;
  - a review of the affordable housing provision with each submission of a reserved matters application;
  - financial contributions towards bus improvements, cycle parking at North Greenwich Station, upgrades to the Riverside Walk, under five childcare provision, the Cultural Strategy, Public Art, off-site Community facilities, Social Services, increased provision of primary school places, improvements to secondary school education, health facilities, environmental monitoring, public realm and open space, GLLaB, emergency services and public safety improvements;
  - carrying out of highways works;
  - submission of a travel plan and car park management plan;
  - provision of a car club and assistance with membership fees;
  - provision of an on-site children's centre/under 5's nursery;
  - amendments to the CPZ to prevent parking permits being issued for residents;
  - provision of cycle routes, provision of a community building; implementation of a Low Emission Transport Strategy;
  - provision of open space;
  - provision of play areas;
  - participation with GLLaB; and
  - provision of affordable business space and implementation of development management arrangements
- 25.3 A Section 73 to the outline planning permission (19/1545/MA) was recently granted. This secured the following amendments:
- Definition of planning and commercial building to be added/amended
  - Viability late stage reviews to be added
  - Trigger on community facility to be updated
  - Trigger on education facility to be updated
  - Trigger on open space to be updated
  - Trigger on MUGA to be updated
  - Reduction of Car Parking provision to be reflected in s106 clauses
  - Trigger to be imposed on provision of non-residential floor space

- 25.4 A Deed of Variation is proposed to accompany the application which proposes the following amendments to the legal agreement:
- Restrict occupation of all residential units in Plots 401-405 until Plot 503 has been delivered to accord with the acoustic requirements set out in the Sandy Brown reports
  - Amendments to mortgagee clauses
  - Correction to non-residential definition to account for all consented floorspace to date.

## 26 **Community Infrastructure Levy (CIL)**

- 26.1 As the Outline Planning Permission was granted consent prior to the 1st of April 2012, the development is not be liable for CIL.

## 27 **Implications for Disadvantaged Groups**

- 27.1 The implications for disadvantaged groups identified below are an integral part of the consideration of the development and community benefits as set out in the report.
- 27.2 Access to and within the development for persons with physical disabilities will be improved.
- 27.3 The proposal will provide new job opportunities in the construction phase.
- 27.4 The application will provide affordable housing on the site.
- 27.5 All new housing will be constructed to Lifetime Homes standard.
- 27.6 10% of the new housing will be designed either to full wheelchair standards or to be easily adaptable to wheelchair standard housing.

## 28 **Conclusion**

- 28.1 The proposal is considered acceptable in principle and is in substantial accordance with the outline consent.
- 28.2 The density and unit mix, is found to be in accordance with the requirements of the outline consent and relevant policy requirements. The application is supported by a viability assessment, which has been considered by an Independent Viability Assessor. The report finds the scheme would be unviable with any further provision of additional affordable housing.

- 28.3 Overall, no concerns are raised regarding the parking provision and impact on highways as the proposed is in accordance with the outline parameters. This is also the case for the cycle parking provision which has been proposed in accordance with Condition 31.
- 28.4 The proposal is considered to be well designed and in accordance with the wider site aspirations. There is sufficient variation from the previously consented elements of the scheme, whilst being in substantial accordance to encourage a sense of continuity and site character.
- 28.5 The scheme delivers a high-quality public square in the centre of the Parcel. Each Plot is designed with a central courtyard accessible by all residents. Each plot also includes at least one communal roof terrace, with Plots 402-405 providing two. These roof terraces are accessible to residents of that core.
- 28.6 The quality of the accommodation has been considered. The proposal is in accordance with the various requirements (Greenwich Wheelchair Site Brief, Lifetime Homes, Building Regulations Part L, and Mayor's Housing SPG 2016). Each unit has private amenity space in the form of courtyard gardens, private rear garden space, balconies and/or terraces.
- 28.7 Amenity of future residents and surrounding properties has been considered and it is concluded that amenity is safeguarded in respect of noise, overlooking, and overshadowing.
- 28.8 The impact on biodiversity has been found to be acceptable.
- 28.9 In conclusion it is considered that the proposed is in accordance with the parameters or the outline planning permission as well as local, regional and national planning policy. It is recommended that the reserved matters application be approved, subject to conditions.

## **29. Background Papers**

- National Planning Policy Framework (2019)
- Planning Practice Guidance
- London Plan (2016)
- Publication London Plan (December 2020)
- Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014)



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