

PLANNING BOARD	Agenda Item: 5
28 July 2020	Reference No: 19/4008/R

Applicant: Greenwich Millennium Village Ltd
Agent: SW Planning Ltd

Site Address: Plot 203, Parcel 2, Greenwich Millennium Village, 3-5 Peartree Way, Greenwich, SE10	Ward: Peninsula Application Type: Reserved matters
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1.0 Recommendation

The Planning Board is requested to:

- 1.1 Resolve to grant conditional reserved matters consent according to the conditions to be detailed in the notice of determination for the following proposal:

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.

- 1.2 Authorise the Assistant Director of Planning & Building Control to:

Make any minor changes to the detailed wording of the recommended conditions as set out in this report and its addendums, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice.

2.0 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:

- 2.2 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.
- 2.3 The application site is constrained by contaminated land, which prevents underground parking/basements and noise from the adjoining Aggregates Works that can operate 24/7 meaning the proposed requires extensive acoustic mitigation. These site constraints have been accounted for within the proposal.
- 2.4 The proposed is designed as a podium block, which then centres around a communal courtyard with parking provision underneath. The proposed has a subtler colour strategy to earlier plots although follows the design strategy for now consented Plot 301 development and the proposed development at Plot 202. Light buff brick and glazed brick are proposed as the main material types. It is considered that the proposed is well designed.
- 2.5 The application proposes a total of 119 units, the breakdown is as follows:

	Private	Affordable Rented	Shared ownership	Total
1 bed	6	0	0	6
2 bed	52	2	5	59
3 bed	42	8	0	50
4 bed	0	4	0	4
Total	100	14	5	119
Percentage	84%	12%	4%	100%

- 2.6 The proposed includes 15.96% affordable housing, whilst this is below the requirements of the masterplan which requires 20%; taking account of the proposed and the consented scheme, the masterplan is delivering 20% affordable housing meaning there is currently a slight over delivery and there is no requirement to provide the 20% affordable housing on a plot by plot basis. In addition, the application has been subject to viability testing, which confirmed that no further units could be provided.
- 2.7 The application has been subject to consultation with statutory consultees, local residents and interested groups. A total of 3 objections have been received from local residents. These are detailed in Section 9 of this report along with the responses from internal and external consultees.

2.8 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.

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

3.0 Summary

3.1 Detailed below is a summary of the application:

The Site -	
Site Area (m ²)	0.46ha
Local Plan Allocation	Part of site allocation GP9 for Residential and A, BI and D uses
Heritage Assets	Not applicable
Tree Preservation Order	No
Flood Risk Zone	Flood Zone 3 - Area benefiting from flood defences

Proposed Building	
Building height (metres AOD)	44.15 AOD m
No. of storeys	Maximum 11 storeys with elements at 7, 6, and 4 stories facing the street and a 1 storey central podium
Floor area (GEA) (m ²)	15,191m ²

Housing		
Density	Units per Hectare (u/ha) and/or Habitable Rooms per Hectare (hr/ha)	270 u/ha 938 hr/ha
Dwelling Mix	Studio (no. / %)	0 / 0%
	1-bed (no. / %)	6 / 5%
	2-bed (no. / %)	59 / 50%
	3-bed (no. / %)	50 / 42%
	4-bed (no. / %)	4 / 3%
	Total (no. / %)	119 / 100%
Affordable Housing / Tenure Split	Overall Affordable Housing (no. / %)	19 / 15.96%

	Affordable Rent (no. / %)	14 / 73.7%
	Intermediate / Shared Ownership (no. / %)	5 / 26.3%
	Private (no. / %)	100 / 84.0%
	Commuted Sum	-
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes

Transportation		
Car Parking	No. existing car parking spaces	0
	No. Proposed Car Parking Spaces	22
	Proposed Parking Ratio	0.18:1
Cycle Parking	No. Proposed Cycle Parking	236 long stay & 7 visitor spaces
	Complies with policy	Yes
Public Transport	PTAL Rating	2

Sustainability / Energy	
BREEAM Rating	N/A
Renewable Energy Source (%)	22.3%

Public Consultation	
Number in Support	0
Number of objections	3
Main issues raised	<ul style="list-style-type: none"> • Overshadowing of the ecology park. • Development not in keeping with the feel of Greenwich Millennium Village. • Development too dense and the buildings are too tall • Lack of play space and green space.

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

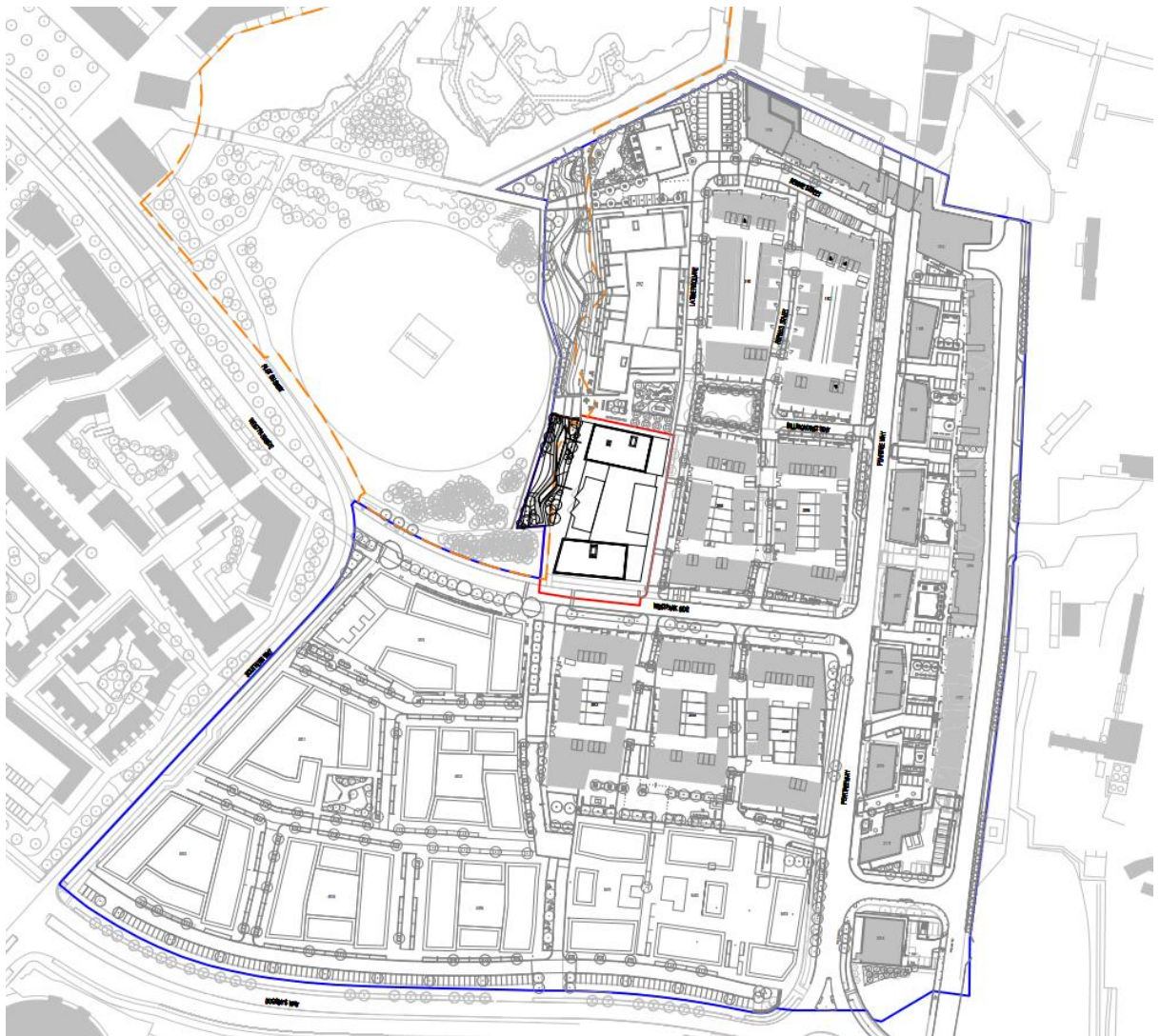
3.3 The application is considered acceptable and is recommended for approval, subject to conditions set out in the report.

4.0 **Site**

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

4.2 This reserved matters application relates specifically to Plot 203 of the development.

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



5.0 Site and Surrounding Area

- 5.1 The application site forms Plot 203 of the Greenwich Millennium Village (GMV345) development and comprises an area of approximately 0.46 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 east are Plots 204 and 205 which received reserved matters consent in 2018 under planning reference: 17/1631/R. These Plots have now been built and are currently being occupied / sold. The buildings comprise of six storey apartment block bookends with residential town houses and courtyard houses in the centre. The townhouses sit adjacent to the application site and are four storeys in height.
- 5.5 Southern Park is located to the west of the application site and shall be separated from the residential block by the proposed eco-swale to be delivered by the applicant. The Greenwich Peninsula Ecology Park sits to the north of Southern Park and together they form a Site of Importance for Nature Conservation (No.NC23 in Table 13 of the Local Plan).
- 5.6 To the north is Plot 202, which is yet to be granted reserved matters consent but has outline consent for C3 residential use with some D1 and/or D2 with consented heights of 11, 8, 6 and 5 storeys with a 2-storey element in the centre. An application for reserved matters consent has been received and is being considered under planning reference: 19/3063/R.
- 5.7 To the south of the application site is Plots 301 and 302. Both of which have received reserved matters consent with Plot 301 being consented in 2019 under planning reference 19/2055/R and Plot 302 receiving consent along with Plots 303 and 304 in 2018 under planning reference 18/1318/R. Plot 302 is designed as six storey apartment block bookends with residential town houses and courtyard houses in the centre. The six-storey element faces onto West Parkside, sitting directly south of the application site. Plot 301 is designed as a podium plot, in a similar form to that which is currently being

considered. The elevation facing onto the application site has elements at 11, 8 and 5 storeys.

6.0 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, number 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 11.05.2018 - Environmental Impact Assessment Screening Opinion under the Town & Country Planning (EIA) Regulations 2011 for the construction of 170 residential dwellings and 613 sq. m. 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 found that an

Environmental Impact Assessment was Not Required for this development (ref: 18/1405/EIA).

- 6.7 14.11.2018 - 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 residents lounge, plus associated infrastructure, landscape and car parking on Plot 201. This application was refused and an appeal has been made.
- 6.8 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).
- 6.9 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).

6.10 04.09.2019 - Environmental Impact Assessment Screening Opinion under the Town & Country Planning (EIA) Regulations 2017 for Plot 301 for the construction of 135 residential dwellings, ancillary residents screening room plus associated infrastructure, landscape and car parking.

It was determined that an Environmental Statement was not required to accompany the reserved matters application as the proposal does not result in a significant effect on the environment beyond that which has already been considered (reference: 19/2216/EIA).

6.11 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 at Plot 301.

This application was approved (reference: 19/2055/R).

6.12 03.09.2019 - 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 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 was approved (reference: 19/3063/R)

6.13 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)

6.14 03.12.2019 - 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).

This application is currently being considered (reference: 19/4075/R)

- 6.15 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).
- 6.16 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)

7.0 Proposal

- 7.1 The Amended Outline Planning Permission established the principle of redeveloping the application site for residential development with a community centre and management facility (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 Plot 203 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 119 residential dwellings, 750 sqm GEA Class D2 community centre and management facility, plus associated infrastructure, landscape and car parking on Plot 203.
- 7.4 The application proposes a total of 119 residential units. The breakdown of housing is as follows:

	Private	Affordable Rented	Shared ownership	Total
1 bed	6	0	0	6
2 bed	52	2	5	59
3 bed	42	8	0	50
4 bed	0	4	0	4

Total	100	14	5	119
Percentage	84%	12%	4%	100%

8.0 Consultation

8.1 **Statutory Consultees**

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

Details of Representation	Summary of Comments	Officers comments
Environment Agency	Advised no comment	
London Fire & Emergency Planning	Satisfied with the proposals 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 noted as an informative to the applicant.
Transport for London	TfL have no principle objections to the application but request further information to be provided on the details of cycle and car parking.	This information will be provided under Condition 31 of the outline planning consent and TfL will be consulted at this stage.
London City Airport	No objection to the application	Noted
Port of London Authority	Advised no objection and requests that they be consulted on Condition 87 of the outline planning permission when this is submitted for discharge.	The PLA will be consulted on the discharge of condition 87 when this is submitted.
Firstplan (on behalf of Cemex/Tarmac/Aggregate Industries/ Daygroup)	Advised no objection to the proposal subject to confirmation that the noise reports submitted with the application do not infringe	The applicant is still required to discharge conditions 87 and 88 of the outline planning permission.

	on Firstplan's ability to provide comment on Conditions 87 and 88.	
GLA	No comments have been received at the time of drafting this report.	As this is a reserved matters application, referral to the GLA is not required.
Natural England	No response has been received at the time of writing this report.	It is considered acceptable to proceed with the determination of the application in the absence of these comments.
Thames Water	No objection raised but recommend that conditions and informatives be imposed	The conditions and informatives have been included in Appendix 3 of this report.
Crime Prevention Officer	No comments provided as part of this application	Conditions on secured by design requirements are included on the Outline application.
GLAAS	Advised no objection to the proposal	Noted

8.2 Council Departments

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

Details of Representation	Summary of Comments	Officers comments
Environmental Health	Advised no objection to the proposal	Noted
Public Health	Advised no comment and agreed that a Health Impact Assessment was not required	Noted
Housing	The proposal is in line with the SI06 and has been subject to viability testing. Service charges should be kept affordable and should be consulted with RBG.	Noted

	The applicant should be in discussions with an RP.	
Waste Services	Following the submission of revised plans and clarification, Waste Services have confirmed that the proposed is acceptable	Noted
Sustainability and Renewal	Application is considered acceptable subject to condition.	The conditions have been included in appendix
Transport and Highways	Following the submission of revised plans and clarification, Transport and Highways have confirmed that the proposed is acceptable	Noted
Occupational Therapist	Full details of areas for review have been issued. Only a small number of matters are outstanding which can be sufficiently deal with at submission of details stage.	Noted
Child Services	Advised no comment	Noted
Flood Risk Manager	The application has been reviewed and no objection has been raised to the proposed strategy.	Noted

8.3 Local Residents

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

Summary of Comments	Officers comments
The development is sited too near the pavement and lacks play space and green space	The siting of the building is in accordance with the parameter plans. Commentary on amenity space and child play space can be found within section 17 of the report.

The uniform height is unattractive and not in keeping with the earlier phases of GMV. It does not create a 'village' feel.	The design, height and massing of the proposed buildings are discussed in detail in section 14 of the report.
The car parking spaces are unnecessary	The level of car parking was set at Outline stage. Further analysis of the car parking is provided at paragraph 21.3 of the report.
There will be overshadowing to the ecology park.	There is no significant overshadowing of the ecology park from plot 203 and this is explored in more detail in paragraph 19.15 of the report.
The height of the buildings should step down towards the park.	The heights of buildings was assessed at Outline stage and this proposal is within the agreed parameters.

8.4 Amenity Groups

No comments from local amenity groups have been received at the time of publishing the report.

9.0 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 Intend to Publish London Plan (December 2019) – The Intend to Publish version has reached an advanced stage in the adoption process, and save for those areas where the Secretary of State has directed modifications the policies in the Intend to Publish version are considered to have substantial weight as a material consideration in the determining of planning applications. The draft London Plan however does not hold full weight until formally adopted and until this time applications will continue to be determined in accordance with the current Local Plan and policies.

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.

10.0 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: 19/4008/R):

- Principle of development;
- Use of the Plot;
- Density;
- Visual Impact (Design and Townscape);
- Residential Units (Housing Mix and Affordable Housing);
- Amenity for future residents and neighbouring properties (Size of units, Noise, Overheating, Sunlight/Daylight, Privacy, amenity space);
- Landscaping / Public Amenity Space / Communal Space;
- Child Play Space;
- Biodiversity
- Sustainability and Energy;
- Transport and Access;
- Air Quality;
- Waste and Refuse Provision;
- Area of High Archaeological Potential;
- Flood Risk;
- Legal Agreement;
- Community Infrastructure Levy (CIL); and
- Implications for disadvantaged groups.

11.0 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 2012 outline application and 2014 and 2019 amendments gave consent for eleven, eight, six, five and two storeys building with the potential to provide a mixed-use development (including Class D1 / D2) with the majority being C3 residential.

11.3 The proposed reserved matters application is 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.

12.0 Use of Plot 203

- 12.1 Plot 203 has planning consent for a mixed-use development including Class D1 / D2 and C3 residential. Reserved Matters consent is now sought for 119 residential dwellings (Class C3) and 750 sqm GEA Community Centre and Management Facility (Class D2), plus associated infrastructure, landscape and car parking.
- 12.2 The 2019 Material Amendment introduced minimum requirements (condition 101) and maximum parameters (condition 11). This is summarised in the following table:

Use Class	Maximum (sqm)	Minimum (sqm)
AI-A4	1,190	657
B1	4,462	4200
D1 (Nursery)	500	470
D1 / D2 (Community Space)	750	730

- 12.3 To date, the applicant has provided 1,113 sqm of AI-A4 floorspace in Plots 302-304 (consented under planning reference: 18/1318/R) and Plot 202 (proposed under planning reference: 19/3063/R). In addition, the applicant has proposed a 500 sqm nursery (D1). The proposed 750 sqm community centre and management facility is therefore in line with the outline planning consent.
- 12.4 The inclusion of the management facility within the community space is expressly set out in the original application documents and the 2012 description of development and as stated on the Decision Notice. The description of development on the DN states "... up to total of 750 sqm (GEA) Class D2 for community space and a management facility..." Moreover, Condition 97 also includes the provision that "The part D1 use shall be used only for a children's nursery and the part D2 use shall only be used for community space and management facility.

- 12.5 The Outline planning consent established that the D1/D2 uses were to be located in Plot 202, 203 or 301. The applicant has advised that the accessibility to the park, clustering and route to / from Southern Park and the Northern Square were all factors taken into account, that determined Plot 203 to be a better location for the facility and allowed for clustering with the cafe and nursery within Plot 202. The clustering creates shared trips, such that visitors to the nursery may also visit the concierge, community centre and /or cafe as well (and vice versa in relation to all). Plot 203 is also accessible on a secondary estate road, with a loading bay nearby making access and servicing more convenient.
- 12.6 The community centre and management facility has been designed based on the parameters of the outline consent and measures 750 sqm GEA and is located on the north east corner of the building, extending over three storeys, adjacent to the communal square created between Plots 202 and 203. Opposite the community centre on the other side of the square will be the café and nursery which are proposed in Plot 202 creating a cluster of uses adding to the sense of vitality. The 750 sqm of community space will be located over three levels with the ground floor including a concierge service for the entire masterplan along with some flexible breakout spaces, for meetings or workspaces. The upper two floors have been designed to allow flexibility with the final layouts subject to the needs of an end user. A condition will be attached requiring details of the space to be provided prior to occupation once an end user is known.
- 12.7 Given the proposed is in line with the parameters set by the outline consent, no objection is raised in principle. Further details have been provided on the nursery space and this is discussed in more detail below.

13.0 Density

- 13.1 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. Policy D3 of the draft London Plan has removed the density matrix and now recommends a design- led approach to density.

- 13.2 Based on the character, location of the site and the proposed development to be bought 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.
- 13.3 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.).
- 13.4 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.
- 13.5 Notwithstanding the policy context, the outline consent restricts the density for the site as follows:

Condition 14 - Density

The overall density of residential provision across the site (including Parcel 1) shall not be less than 130 dwellings per hectare nor more than 210 dwellings per hectare.

Reason 14: To ensure a good living environment for future residents and that the residential units are adequately distributed across the site and to ensure compliance with Policy 3.4 of the London Plan (2016).

- 13.6 The proposed provides 119 dwellings and 413 habitable rooms within a site area of 0.46ha, the community centre and management facility measures 750 sqm. This equates to a density of 270 dwellings per hectare and 938 habitable rooms per hectare for Plot 203. The applicant has then compared this to the remainder of Parcel 2, which includes a total of 501 units within a site area of 2.67ha. This equates to a total density of 188 u/ha. The scale and density of the proposal is well within the parameters of the Outline Planning Permission and is compliant with London Plan Policy 3.4.

14.0 Visual Impact (Design and Impact on the Character of the Surrounding Area)

- 14.1 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. In addition, draft London Plan Policies D3 and D4 set out the requirements for a design led approach to development and ensuring schemes delivery high quality design.

- 14.2 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.
- 14.3 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”.
- 14.4 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), plots under construction, contaminated land.
- 14.5 The overall layout, scale and massing of Plot 203 was established by the outline consent. The site occupies a prominent location in the masterplan and sits opposite the park; meaning careful consideration of the design is required to ensure the scheme suitably responds to its location. Plot 203 and along with Plot 202 and Plot 301 create the boundary to Southern Park. It is therefore important that the elevational treatment responds to this location and that the buildings are considered together. It is noted that Plot 301 has received reserved matters consent (reference: 19/2055/R) and Plot 202 is being considered under planning reference 19/3063/R.
- 14.6 The parameter plans consented by the Outline Planning Permission granted consent for a single building at Plot 203 with a maximum height of 11 storeys (44.15m AOD), with elements at 8 storey (34.70m AOD), 6 storey (28.40m AOD), 5 storey (25.25m) and 2 storeys (13.80m AOD). The land use plan consented by 19/1545/MA included residential C3 with provision for possible D1/D2 floor space. Foot and cycle paths were consented on the south and west of the Plot with a primary estate road to the east and a secondary estate

road to the north. The parameters allow for podium parking in the centre of the plot. The parameters include a residential courtyard in the centre.

- 14.7 Plot 203 is designed with a maximum height of 11 storeys. The proposal also includes lower elements with elements at 7, 6, and 4 stories facing the street and a 1-storey element in the centre creating the podium. A podium block has been consented at Plot 301 (19/2055/R) and proposed at Plot 202 (19/3063/R). The taller elements of the massing will surround an inner courtyard which shall be used as a communal space; beneath this will be the car parking. Parts of the massing have been cut away to ensure the central courtyard benefits from sunlight/daylight and to create an interesting design when experienced at street level by introducing a sense of differentiation to avoid an overly bulky structure.
- 14.8 Three out of the four sides of the block will include flatted accommodation with the remaining side facing onto Rennie Street providing three storey townhouses. This will create a more intimate street scale on Rennie Street when set with the existing context of Plots 101, 202 and 204 which also includes townhouses although at four storeys.
- 14.9 The materials used at Plot 203 consist of primarily brick, with glazed bricks being used at the high levels on the north and west elevations and in some places along the ground floor. The materials are proposed as light grey textured brick, enamelled steel panels coloured orange to highlight the community centre and management facility, leaf pattern laser cut metal colour bronze on balconies the sixth floor elevation facing Southern Park and bronze PPC aluminium for the balcony railings and window frames with clear glass balustrades to recessed balconies and walkways. This is a reduced palette from the previous plots based on lessons learned about overuse of colour and differing brick types, the style is similar to Plots 202 and 301 whilst maintaining an individual character. Feature brickwork panels are used on the lower levels of the building to aid the composition of the facades. Indicative materials can be found in the Design and Access Statement. A condition requiring facing materials to be submitted prior to commencement is already required by 12/0022/O as amended by 14/1633/MA (Condition 15).
- 14.10 The edges of the podium have been designed to allow some view of the green landscaping when walking at street level to help enhance the pedestrian experience.
- 14.11 A rational, regular grid has been applied to the elevation to create a strong and expressive façade. A band with additional detailing is used on each floor to accentuate the horizontal treatment of the façade. Both inset and

projecting balconies are proposed to animate the façade. The community centre and management facility is designed with additional colour and in such a way as to be read with the proposed nursery and café on the building opposite to create a cluster of non-residential uses. Vertical solid and glazed angled panels have been used to create an interesting façade treatment to this non-residential use.

- 14.12 The application is also accompanied by a landscaping proposal (set out in TM360R03A Landscaping Statement). It should be noted that the outline consent requires that further details of landscaping be provided by way of condition. However, in terms of visual impact, the landscaping proposal is considered to enhance the public realm and be a positive feature of the scheme. No concerns are raised regarding the visual design of the landscaping. Landscaping is discussed further in Section 18 of this report.
- 14.13 The scheme has been designed to be tenure blind. This has been achieved by ensuring that there is no differentiation between affordable and private core entrances and material choices are consistent across the scheme. Access to the communal facilities is also available to all tenure types. The affordable units are located within the lower units of the 11-storey element on the southern part of the block and include the four townhouses.
- 14.14 The design effect is considered to be appropriate and visually attractive and overall accords with the design rationale for the wider site.

15.0 Residential Accommodation

Housing Mix

- 15.1 London Plan Policy 3.8 supports the provision of different types and sizes of dwellings to provide a choice of homes for Londoner's. This is reflective of draft London Plan Policy H10 which sets out that schemes should generally consist of a range of unit sizes.
- 15.2 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.
- 15.3 The GLA's Housing SPG (March 2016, updated August 2017) notes that while the Strategic Housing Market Assessment (SHMA) identifies a net need for family-sized market housing, this is a pan-London figure that assumes the continuation of existing patterns of under-occupation. GLA projections show

nearly 70% of household growth between 2011 and 2035 will be for households without children.

- 15.4 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:

Unit size	No. of units		Total	Percentage
	Parcel 1	Parcels 2-5		
1 bed	125	231	356	20%
2 bed	216	640	856	49%
3 bed	95	375	470	27%
4 bed	15	49	64	7%
Total	451	1,295	1,746	100%

- 15.5 The reserved matters for Plot 203 includes a mix of one and two bed units as well as three and four bed family units. The family units account for 54 out of 119 family units, equating to 45%. These are provided as both 3 bed and 4 bed units. This is therefore above the requirement for 31% family provision, however this is a site wide requirement and therefore the applicant must meet this requirement across the masterplan not just on a plot by plot basis.
- 15.6 Including all consented plots and those proposed on Plot 203, 26% of units consented are family accommodation (331 3B+ dwellings out of 1,257). This is therefore below the requirements of condition 13. There is no requirement for the scheme to deliver a set percentage throughout the delivery of the masterplan and the scheme is anticipated to achieve a family mix of 30% when Parcel 4 is taken into account and the applicant will be required to meet this condition. As such, no objection is raised.
- 15.7 Units are provided in flatted accommodation, maisonette and town houses. The townhouses are provided as socially rented units which is a positive element of the scheme. The housing team has previously raised the lack of provision of affordable units in the town houses as an issue, as to date the affordable units have been provided as flatted accommodation only although townhouses are also proposed as social rented units in the proposed reserved matters at Plot 202. As such, the proposal mix of units for the various tenure types at Plot 203 is considered acceptable and delivers a range of unit types.

Wheelchair units

- 15.8 A total of 12 units shall be provided for wheelchair users in line with the requirements of the planning restrictions attached to the outline consent for 10% of all dwellings.
- 15.9 10% of the shared ownership and private units (11 no.) will be provided as wheelchair adaptable units. These are all to be provided as 2b/3p and 2b/4p units. These would be built out to comply with Part M4(2) of Building Regulations. 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.
- 15.10 There are 14 social rent dwellings. The applicant is required to provide 10% as wheelchair adapted; this creates a requirement for 1 unit when rounded down. This will be provided as wheelchair adapted within the social rented units. This will be a 2b/4p unit located on the ground floor. The unit is required to be designed to comply with the Greenwich Wheelchair Site Brief as per the conditions attached to the consent with additional details being provided post consent. The proposed accords with the requirements of condition 33.
- 15.11 Wheelchair parking spaces are located as close as possible to the dwelling as circumstances will permit.

Affordable Housing

- 15.12 London Plan 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'. Draft London Plan policy H4 sets out the strategy target for 50% for all new homes with Policy H5 sets out the threshold approach for major developments and Policy H6 setting out the requirements for the tenure split.
- 15.13 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 requiring a viability assessment be submitted with each reserved matters to establish whether any additional affordable accommodation could be provided. 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.

- 15.14 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.
- 15.15 The reserved matters application provides 19 affordable units of the total 119 making 15.96%. 14 of these are social rented units and 5 are shared ownership. This creates a tenure split of 73:27. The proposed slightly deviates from the outline requirement for a 70:30 split however is in substantial accordance with the requirements of the outline consent in terms of tenure split. However, the proposed does fall below the required 20% total affordable housing site wide for this plot. It is noted however that the minimum of 20% provision is on a site wide basis and there is no requirement for the 20% provision to be met on a plot-by-plot basis. As shown in the following tables, the applicant is compliant with this requirement site wide accounting for the submitted reserved matters applications and therefore no objection is raised.
- 15.16 In accordance with the requirements of the legal agreement and current policy, a viability assessment has been submitted with the application. The viability assessment concludes that the GMV development is unviable. BPS, on behalf of the Council, find that the GMV masterplan generates a residual profit of £151m. This is less than the benchmark profit target of 20% of GDV (£175.6m), leaving a remaining viability deficit of -£24.6m. BPS therefore conclude that the current 20% offer of affordable housing in the wider GMV Masterplan development was the maximum reasonable provision consistent with viability. As such, this Plot would not be viable with any additional affordable units.
- 15.17 The current consented provision of affordable housing on site is as follows:

Parcel/Plots	Affordable	Total units
Parcel 1(101-109)	113	451
Parcel 2: (201, 202, 204-210)	64	382
Parcel 3: (301-304)	54	316
Total	231	1,149
Percentage	20.1%	100%

15.18 Taking account of this proposal, the provision of affordable housing on a site wide basis would be as follows:

Parcel/Plots	Affordable	Total units
Parcel 1(101-109)	113	451
Parcel 2: (201, 202, 204-210)	64	382
Parcel 3: (301-304)	54	305
Parcel 2: (203)*	19	119
Total	250	1,268
Percentage	19.75%	100%

*Plot being considered

15.19 As can be seen from the above, the applicant is currently slightly under providing on affordable units when compared to that which is required by the SI06. The applicant has also submitted all remaining RMAs and therefore a site wide understanding of total affordable units can be established. Taking the proposed Parcel 4 reserved matters application into account (19/4075/R), the site wide provision is as follows:

Parcel/Plots	Affordable	Total units
Parcel 1(101-109)	113	451
Parcel 2: (201, 202, 203*, 204-210)	83	501
Parcel 3: (301-304)	54	305
Parcel 4: (401-405)	99	489
Total	349	1,746
Percentage	20%	100%

15.20 As seen from above, the proposed scheme along with the consented and currently submitted reserved matters applications provide a total of 20% affordable housing.

- 15.21 As noted above, there is no requirement for the 20% provision to be provided on a plot-by-plot basis and thus the proposed 15.96% affordable housing in Plot 203 does not conflict with the outline consent.
- 15.22 Given the confirmation from the assessor that the viability assessment is correct 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.
- 15.23 Within the 19 affordable units, 12 of these shall be delivered as family accommodation (3 and 4 beds). These will all be affordable rented accommodation. The remaining 7 shall be 2 beds (2 affordable rented units and 5 shared ownership units). As such, 63% of the affordable are therefore family units. This well beyond the required 31% site wide and is a positive element of the scheme. The remaining applications must demonstrate that 31% of affordable units have been provided as family units site wide.
- 15.24 On balance, the provision of affordable units is considered acceptable in this instance and the applicant must continue to demonstrate that they are compliant with the requirements of the outline consent on a site wide basis.

16.0 Amenity (for future residents and neighbouring properties)

- 16.1 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. The Mayor's Housing SPG sets out further guidance for good quality housing design. It is noted that the housing standards and assessment remain broadly the same within the detailed policy D6 within the London Plan (2019).
- 16.2 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.
- 16.3 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.

- 16.4 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.
- 16.5 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

- 16.6 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.
- 16.7 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

- 16.8 The application has been designed with 66% dual aspect and 8% triple aspect units with the remaining 26% being single aspect. There are no family units that are single aspect; all single aspect units are 1b and 2b units. All single aspect units are either south facing or west facing. There are no single aspect north facing units in the development proposal.

Noise

- 16.9 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.
- 16.10 The planning application is supported by an acoustic, noise and vibrations report produced by Sandy Brown as per Condition 87, 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.

- 16.11 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.
- 16.12 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.
- 16.13 In addition, future buildings may form screening to future phases of the development or may reflect noise back onto site, meaning the noise levels change throughout the various stages of development. As such, the applicant has considered the noise levels for each facade at the point the proposed building will be occupied and also at the completion of the master plan as a whole, and designed to the worst case (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.
- 16.14 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.
- 16.15 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.

- 16.16 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.
- 16.17 The 'At Occupation' noise model has considered the acoustic requirements for Plot 203 based on the assumption that the buildings at Plots 101 to 109, 201, 202, 204 to 210, 301 to 304 and 504 are completed. Plots 201, 202 and 301 have not yet commenced. As such, it is recommended that a condition be attached prohibiting occupation of Plot 203 until these buildings are complete.

Overheating

- 16.18 An overheating assessment has been provided with the application, assessing the risks of the spaces for current and future climate scenarios in accordance with the methodology set out in CIBSE TM59. 3D thermal models of the proposed scheme have been developed. A total of 63 habitable rooms belonging to flats on lower, mid-level and top floor levels were analysed to provide a representative sample of the space and dwelling typologies within the development. Further details of the units tested can be found in Appendix A of the Energy Statement. The applicant has undertaken an assessment against DSY1 (1989), 2 (2003) & 3 (1976). 1989 (DSY1-High Emissions 50 Percentile) represents a moderately warm summer, as is interpreted in current CIBSE guidance. The years 1976 (DSY2-High Emissions 50 Percentile) and 2003 (DSY3-High Emissions 50 Percentile) were chosen as more extreme years with different types of summer: the former has a more intense single warm spell, whereas the latter represents a year with a longer period of persistent warmth. It should be noted that compliance with DSY2 and DSY3, as a more onerous data set, is not a requirement of CIBSE TM59 however these have been tested by the applicant.
- 16.19 The proposed ventilation strategy for the development entails the use of Mechanical Ventilation with Heat Recovery (MVHR) for the whole year.
- 16.20 Units that cannot purge air naturally by opening windows have mechanical purge ventilation and comfort cooling. The risk of overheating for units is reduced through the application of solar control glazing to non-north facing living room windows, as well as the provision of overhanging or recessed balconies, which also act as private amenity to the dwellings above. Rooms with acoustic screening but not sealed windows will have openable windows for natural ventilation (free areas in line with recommendations within the overheating report). Rooms with sealed windows will be provided with comfort cooling.

- 16.21 The report concludes that all units are likely to achieve compliance with overheating benchmarks, provided that adequate design measures are taken into account. Table 7 of the Energy strategy sets out the recommendations made in line with GLA guidance. The outline consent is also subject to a condition requiring an overheating strategy to be submitted prior to the construction of the relevant part. It is further recommended that a condition be imposed to the reserved matters application requiring compliance with the recommendations made in the energy strategy on overheating.
- 16.22 The agent has advised the overheating report only presents the result for sample units that are not sealed for acoustic reasons. Units with sealed windows will not be able to utilise natural ventilation for passive cooling. These units will still have overhang/recessed balconies (where relevant) and solar control glazing as recommended for all units across the site, but without the window 'glazing free' area. All units with sealed windows will have mechanical cooling. There are no units that are fully sealed. Bedrooms may be sealed and fitted with mechanical ventilation but living rooms have access to natural ventilation as well as MVHR.

Sunlight / Daylight / Overshadowing

- 16.23 A sunlight/daylight assessment has been undertaken for Plot 203. This provides a number of assessments including an assessment of the levels achieved for the proposed units and surrounding blocks.
- 16.24 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.
- 16.25 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

- 16.26 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.

16.27 The results of the testing are set out in detail in the DSO report. The rooms tested were taken from the first four floors, which were considered to be the worst-case dwellings. This shows that of the 99 windows tested (29 KLD, 3 living rooms and 67 bedrooms) all KLDs and living rooms achieved at least 1.5% ADF with the majority (24/29) achieving 2%. Five bedrooms failed to meet the BRE standards. These failures affect a total of three units, one in each tenure type.

16.28 The DSO report discusses the design development that has been undertaken to optimise the scheme's performance. To improve the DSO the applicant has increased glazed areas, relocated external columns and revised room layouts. The applicant has also set out the methods by which the design sought to maximise standards noting that the KLDs were prioritised as the primary living spaces. These must also be balanced with other requirements to ensure the units are compliant with overheating conditions, maintain privacy and do not expose the unit to excessive noise conditions. Following these design amendments, there is one window in a second floor 2b/3p private unit serving a bedroom that fails to meet the BRE guidelines, with the room achieving 0.88% rather than 1.00%. Given that all other rooms pass the BRE guidelines for this unit and the failure is marginal, this is considered acceptable. In addition, there are two 2-bedroom units in which both bedrooms fail the BRE guidelines. The rooms achieve 0.56/1.00 and 0.40/1.00 in one unit and 0.40/1.00 and 0.57/1.00 in the other. As the DSO document sets out, measures have been employed to optimise the site's performance and given the small number of units that fail, on balance the scheme is considered acceptable.

Sunlight

16.29 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.

16.30 A sunlight assessment has been carried out on the south facing living rooms in the proposal as per the BRE guidelines. This equated to 23 windows. Of which, 14 will achieve adequate annual and winter sunlight based on the BRE guide. Of the remaining 9 living spaces, 2 will satisfy the BRE criteria for adequate annual sunlight hours. The remaining 7 living spaces did not meet the BRE recommended target. Of these living spaces; 5 are served by a window facing within 90 degrees of due south which feeds 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 received. Of the remaining 2 windows, both are predominantly west-facing and therefore is limited in the number of available sunlight hours it can achieve throughout the year.

Overshadowing

16.31 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 March.

16.32 The results for the overshadowing tests undertaken on the podium show that on the 21st March the space does not achieve 50% and instead only 7% of the area will receive 2 hours of sunlight. This does represent an uplift from the outline massing however in which 0% of the area would have achieved 2 hours of sunlight. There are also two roof terraces, one meets the BRE test (86% on 21st March) while the other, directly in front of the southern block, performs poorly (achieving only 2% on 21st March). The applicant has advised that the podium and roof terrace amenity spaces are broadly designed as a secondary level of amenity with the assumption being that the majority of residents will utilise their own private balconies and Southern Park, directly to the west of the plot, as primary amenity spaces as well as the Northern Square and Southern Park LEAP for children’s play. Moreover, the proposed massing has been reduced from outline, particularly around the podium in the east and west blocks. The main reduction has been to the massing along the east, which has been reduced to only 2 storeys above the podium and is less than the length of the outline block; this allows for morning sun to be increased in the podium in conjunction with reduced scale design for the western block. This is in line with the mitigation measures stipulated in the ES that requires a reduction in the massing to improve the overshadowing

outcomes of the podium. Finally, testing shows that on 21 June approximately 79% of the podium area will achieve more than 2 hours with each roof terrace also performing well (northern terrace achieving 94% and southern terrace achieving 99%).

- 16.33 No objection to this is raised due to the close proximity of the park along with the fact that the proposal conforms with the massing proposed by the outline planning consent and has sought to reduce the massing in accordance with the ES, in addition to providing additional amenity spaces both within the plot and within the wider masterplan.
- 16.34 The daylight results presented in the report where relative VSCs are all close to or above 1.0 relative to the outline planning permission. There are five units in Plot 202, which result in a VSC slightly below 1.0. The rooms affected are all bedrooms and have VSC levels varying between 0.96-0.99/1.0 relative to the outline consent. As such, the impact is marginal and the windows achieve daylight levels beyond the recommended standards. The impact is a result of the projecting balconies on the west elevation. Given the small number of units that are affected and the fact that the impact is marginal, this is considered acceptable.
- 16.35 With regards to overshadowing of Southern Park as an amenity space, this has been clearly addressed on Page 21 of the DSO report, showing that 100% of the space will receive at least 2 hours of sunlight on 21 March, which significantly exceeds the 50% area recommended by the BRE.

Privacy / Overlooking

- 16.36 Guidance suggests a distance of 18-21m. The Housing SPG notes that whilst this may be a useful 'yardstick' it should not be applied rigidly as it can "limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density".
- 16.37 Standard 28 of the Major'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, 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 12.9m. 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.

- 16.38 In regard to the distance from the proposed site to the nearest point, the proposal is 22.5m from Plot 302, 11m from Plot 204 and 15.5m from Plot 202. The proposed is below the SPG's guidelines; however, 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. The window arrangement has also been considered to ensure impact on neighbouring properties is reduced.
- 16.39 Additionally, the applicant has advised that they have sought to maintain privacy for future residents by designing the western block units to be oriented to be west facing and the eastern block units predominantly east facing. The western units have their primary access via the podium or the east side, such that there are only two units that do not have a walkway to the east side. This minimises overlooking to the eastern units and so protects their privacy. Only two units have windows that face east, and these are at a slight angle away from the 3 storey maisonettes opposite. Further the windows serve only hallways and bedrooms.
- 16.40 All the private amenity spaces onto the Podium benefit from extended buffer zones of dense planting, enhancing the privacy of these areas, as is set out in the Landscape DAS. Regarding the rest of the private amenity spaces outside the Podium the diagram on page 59 of the DAS explains how the recessed balconies have been prioritised in many areas to achieve an improved privacy from the adjacent dwellings and the footpaths passing the dwellings. P60 shows the raised position of the western duplex units and the extent boundary planting that together prevent views into the dwellings and protect privacy.
- 16.41 The apartment block has balconies/terraces on all elevations, although not possible in all locations, these are spaced across the elevations to avoid being in close proximity to another balcony where possible.
- 16.42 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

- 16.43 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.

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

17.0 Landscaping / Public Amenity Space / Communal Space

17.1 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.

17.2 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.

17.3 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.

17.4 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 is one group of trees that need to be removed to facilitate the development, including Ash and Hornbeam (total 23 trees). All of the above are identified in the report as BS Category B2, which is described, as 'Trees of moderate quality and value: those in such a condition to make a significant contribution'. The report identifies that the trees need to be removed to facilitate revised landscaping and the ecoswale.

17.5 The ecoswale is an integral part of the masterplan that has been within the design strategy since the 2011 outline planning application. The purpose of the swale is for both ecological enhancements and drainage. Fairly significant changes in ground levels and extensive ground works are required to create the swale meaning some or all the trees within the area of the swale will need to be removed as a result of the impact of the ground level changes.

17.6 Forty-one trees of ten varying types are proposed within the application site. Details of the tree types and locations can be found in the landscaping report produced by Turkington Martin. 23 new trees shall be planted within the

swale which are of greater size and maturity than many of those being removed as well as 18 trees on the podium so there is a net gain of 18 trees across the application site.

- 17.7 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 grant planning consent.
- 17.8 The redline boundary sits tightly to the building with only the public landscaping being the ecoswale. To the north of the application site is the public square, which is proposed as part of the Plot 202 reserved matters application.
- 17.9 At the centre of the building will be a communal podium space accessible to all residents. The podium is the location of some private amenity space in the form of balconies and will be protected by defensible space. The podium also includes a modest provision of play space; this is discussed further below. There are also two smaller roof terrace spaces, which include planting and seating for quite enjoyment purposes. Residents in Core A will have access to the podium and northern roof terrace and residents in Cores B&C will have access to the podium and southern roof terrace. There is no charge for access.
- 17.10 Hard landscaping will be a combination of granite flag paving to ground floor private patios, concrete block paving to footpaths on pedestrian areas, concrete paving slabs to podium patios. Paving flag strips will also be used on the podium to create a softened effect to the landscaping and rubber play surfacing will be used for the play area. Further details of this can be found in the Landscape Statement with example images and details of the locations of each material type to be used across Plot 202.
- 17.11 The 2012 ES requires an improvement to the sunlight/daylight into amenity spaces. The communal terrace does not achieve the BRE requirement of 50% of the space receiving 2 hours of sunlight in March. The site instead achieves as the 2 hours is achieved for only 7% of the space proposed. The applicant has advised that this is an improvement against the outline massing which resulted in 0% of the space achieving this BRE requirement. There are an additional two amenity spaces provided for residents. The overshadowing levels are discussed further in Section 16 of this report.
- 17.12 The podium delivers flexible amenity spaces and continuous seating walls located throughout the podium landscape to allow varied use of the space for

both play, gathering and quiet enjoyment. Additionally the applicant has noted that the podium is not considered to be the primary amenity space for the residents of Plot 202 as they will have full access to individual private balconies, as well as to Southern Park which is located immediately adjacent, with good sunlight access year-round and the play space / public squares located throughout the development.

- 17.13 All units that sit flush with the podium will have direct access onto this space and defensible space is provided to retain privacy. This includes the private flats and the affordable units located in the town houses. There is one flat, which shall be affordable rent in tenure, which does not have direct access. However, it can access to the communal amenity space easily through communal corridor like all other dwelling in this building block.
- 17.14 In addition to the podium amenity space, communal amenity space is proposed in two locations on the sixth floor as roof terraces. Both spaces propose seating areas and are only intended to provide small areas of social space for residents. Residents therefore will have access to both an area of quiet enjoyment on the sixth floor and a more active area at podium level, which includes play provision.
- 17.15 All tenures have access to all spaces, from the core in which they are situated – residents in Core A will have access to the podium and northern roof terrace and residents in Cores B&C will have access to the podium and southern roof terrace.
- 17.16 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.

18.0 Child Play space

- 18.1 Policy 3.6 of the 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. This is supported by draft London Plan policy S4. 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.
- 18.2 The proposed includes a communal terrace for residents of the block to access at first floor. This includes an area of dedicated play.

- 18.3 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. This was based on policy framework relevant at the time. Based on the GLA's Play Space Calculator (2019) the development creates a requirement for 627.9 sqm based on a child yield of 62.8.
- 18.4 The dedicated play space for residents of Plot 202 only (podium) measures 61 sq. m with an additional 162 sq. m provided as doorstep play on the podium. The formal play equipment has had to be amended and slightly reduced to respond to the requirements of the fire strategy, although this has reduced the quality of the space it is considered acceptable due to the constraints and the fact that additional play is provided directly adjacent to Plot 203 by GMVL and the plot is adjacent to Southern Park. The play area located in the public square adjacent to Plot 203 measures 214 sqm and sits to the north of the application site. This is publicly accessible to serve residents in the wider masterplan as well as plot 203. There is additional play adjacent to the café. These have both been approved as part of the Plot 202 reserved matters approval. The site sits direct adjacent to Southern Park and the wider masterplan accommodates the needs of the development site wide.

19.0 Biodiversity

- 19.1 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',
- 19.2 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
- 19.3 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.
- 19.4 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.

- 19.5 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. This is reflective of the requirements of draft London Plan policy G6 which sets out that ‘development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain’.
- 19.6 Policy DHI of the Core Strategy states that all developments are expected to enhance biodiversity consistent with the Greenwich Biodiversity Action Plan.
- 19.7 Policy OS4 of the Core Strategy states that the Royal Greenwich's rich biodiversity and geodiversity will be protected, restored and enhanced.
- 19.8 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.
- 19.9 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.
- 19.10 The proposal includes half of the eco-swale that shall be located adjacent to Southern Park. The eco-swale is described as making an important contribution to site-wide bio- diversity, forming part of a green spine which effectively extends the qualities of the existing ecology park into the development and Southern Park. The eco-swale also forms a part of the site-wide sustainable drainage (SUDS) strategy, accommodating surface water run-off from areas of hard landscape and the roofs of adjacent buildings.
- 19.11 Some areas of the swale shall allow for public access to allow for the swale to become part of the amenity provision for the site; however, a section shall also be fenced off to restrict access to help allow the more rapid development of habitats and increase the biodiversity value of the swale.
- 19.12 It is explained in the landscaping statement that the landowners of the Ecology Park, The Land Trust (LT) intend to take over the long-term maintenance of the swale and have further visions as to how the swale can be

developed. This is not set out in this proposal however and a more limited version of the swale is presented.

19.13 The swale is designed as a shallow valley with the base consisting of a shingle channel and reed bed. Along the channel are lower areas where surface water is retained and which are intended to support wetland planting. Surface water run-off from adjacent areas and the buildings is specifically channelled towards these areas. The type of planting to be located in the swale proposed as part of this application includes meadow, woodland edge planting, shrub planting, wetland planting, high flow shingle channel, low flow wetland shingle channel / wetland area and a gabion wall.

19.14 Bat, bird and black redstart boxes are proposed as part of the development.

19.15 The ecological assessment report of overshadowing of the Ecology Park confirms that no area within the Ecology Park would be overshadowed by Block 203 in March or June. In addition to the mitigation provided as part of the application, the residual effect of Block 202 is considered not significant. The application has been independently assessed to determine whether the impact and proposed mitigation is acceptable. The review found the proposed to be compliant with relevant policy requirements subject to the imposition of condition. These have been included in Appendix 3 of this report.

19.16 The strategy for biodiverse roofs (green and brown) was established as part of the consented masterplan, with a number of biodiverse roofs throughout the development. These roofs would be laid as a wildflower blanket, but feature other biodiversity and habitat elements, designed to encourage insects, invertebrates and birds. The biodiverse roof system is incorporated around and together with the roof plant and PV panels respectively. Habitat elements include perforated log piles, mounds of pebbles, mounds of soil claimed from site. Details of the biodiverse roof are already required under the conditions attached to the outline planning permission.

20.0 Sustainability and Energy

20.1 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.

- 20.2 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.
- 20.3 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)”. Draft London Plan policy SI2 further sets out the ways in which London shall seek to become a zero-carbon city and how new development shall be consented in accordance with this strategic aim.
- 20.4 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)”.
- 20.5 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 CO₂ 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). This condition was amended under the 2019 S73 requiring 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 CO₂ reductions, to be evidenced with each subsequent reserved matters application. The condition also required all calculations presented in the Energy Report to be presented in line with the current and future GLA Guidance on Energy assessments.
- 20.6 The energy assessment for the site has been carried out using the London Plan’s energy hierarchy; Be Lean, Be Clean, Be Green. The applicant is proposing a CO₂ reduction of 22.3% from renewables compared to the Be Clean stage and a 61.1% reduction against Building Regulations 2013 to be achieved.
- 20.7 Be lean (energy efficiency/building fabric) measures are set to achieve a 7.9% reduction. The exact breakdown of this is as follows: 6.2% (9.7tonnes per

annum) for the domestic part of the development; 30.2% (3.5tonnes per annum) for the non-domestic part of the development (assuming air source heat pump to be installed as part of tenant fit-out); and 7.9% (13.2tonnes per annum) across the whole of Plot 203. This is achieved by enhanced fabric efficiency of the building envelope; air tightness better than Part L 2013 standards; reducing the need for artificial light by maximising daylight in habitable spaces; high efficiency lighting systems; Mechanical Ventilation Heat Recovery for dwellings and non-residential units; air source heat pumps and monitoring (e.g. smart meters). As part of this step the Cooling Hierarchy (see London Plan Policy 5.9) is implemented and measures are proposed to reduce the demand for active cooling. A condition will be attached requiring air source heat pumps are installed in the non-residential units to ensure the development reaches the reductions set out in the Energy Report.

- 20.8 For the Be Clean stage, the development is proposing to connect to the GMV district-heating network with CHPs (Combined Heat and Power) and centralised boilers. The main energy centre for this district heat network is located at Plot 504. Plot 504 is due to be completed and operational shortly. There is a temporary energy centre in Parcel 1 currently serving the site. By means of connection to the site wide heat network, regulated CO2 emissions will be reduced by 42.1% under Be Clean. Should consent be granted, it is recommended that a condition be imposed requiring the Energy Centre at Plot 504 be complete to ensure the Be Clean stage is compliant.
- 20.9 Under Be Green, the applicant is proposing the solar panels (PVs) and air source heat pumps (ASHP). The ASHPs serve the units that require further cooling and the non-residential spaces. The PV panels shall be connected to the landlord areas of the development (such as corridors or entrance lobbies). The PV panels and the ASHPs will reduce CO2 emissions on site by 11.0% over Part L baseline and 22.3% over 'Be Clean' baseline for the development which meets the requirement for minimum 18.5% against the baseline for the development.
- 20.10 Condition 107 was attached to the 2019 s73 and set out that the development hereby permitted shall seek to achieve one hundred percent (100%) reduction in regulated building carbon dioxide emissions over Part L 2013 of the building regulations and achieve no less than a thirty five per cent (35%) reduction in building carbon dioxide emissions over Part L 2013 of the building regulations with Part d of the condition requiring all remaining regulated CO2 emissions not dealt with on site must be offset through a s106 contribution subject to viability testing at each reserved matters stage. To achieve one hundred percent (100%) reduction in regulated building carbon dioxide emissions over Part L 2013, the applicant would need to reduce

emissions by a further 57.3 tonnesCO₂/annum. This would equate to £103,140.00. This is subject to viability testing.

- 20.11 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 14/1633/MA.
- 20.12 The applicant has submitted pre-assessment document, against Code for Sustainable Homes Level 4. The pre-assessment shows all units achieving code for sustainable homes Level 4 (total points scored equals 69.60).
- 20.13 The outline consent requires the developer to build all non-residential space to a minimum of BREEAM Outstanding. An assessment for the non-residential spaces will be required under condition 51. A non-material amendment application has been approved to amend condition 51 attached to 14/1633/MA to require compliance with BREEAM Excellent, which is the requirement below Outstanding. This application will require compliance with 19/1545/MA however.

21.0 Impact on Transport and Infrastructure

- 21.1 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. Draft London Plan policy T1 sets out the strategic aim that 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 with Policy T2 setting out the Healthy Streets approach.
- 21.2 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.

- 21.3 Twenty-two parking spaces are proposed in total within the redline boundary, all of which are proposed as under croft spaces within the development block. This creates a ratio of 0.18:1 cars to residential units. The 2019 S73 reduced the parking provision required site wide to a ratio of 0.34:1 car parking spaces to residential units, down from 0.45:1. The proposed parking conforms to the general principles of the outline consent and parameter plans as earlier phases have overprovided in regard to parking bays and thus the 18% provision is acceptable. The applicant will need to comply with the 0.34:1 site wide.
- 21.4 Car parking spaces are sold to residents as a right to park rather than allocated a space directly.
- 21.5 SI06 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. A total of 2 wheelchair spaces are proposed which complies with this requirement.
- 21.6 20% of all bays will require active and 20% require have passive electric vehicle charging spaces. This equates to 5 active and 5 passive spaces.
- 21.7 Policy 6.9 of the London Plan requires that developments provide 'secure, integrated, convenient and accessible cycle parking facilities' in accordance with Table 6.3. Table 6.3 requires 1 space per studio/1 bed and 2 spaces for all other unit size. The provision of cycle parking spaces across the masterplan was increased to be in line with draft London Plan standards under the 2019 S73 (Condition 31). This requires 1 space per studio; 1.5 spaces per one-bedroom unit; 2 spaces for all other dwellings; and 1 visitor space per 40 units. The proposed includes no studios, 6 one beds and the remaining 113 units being 2bed+ creating a requirement for 235 spaces for the residential dwellings and 3 short stay spaces. The proposal includes provision for 236 cycle spaces for the residential units. A total of 34 spaces are provided in the Square, which will serve the non-residential facilities in Plots 202 and 203 as well as the residential visitor spaces. There are a further 4 spaces located near to the entrances of cores B & C on Westside Park. The proposal also provides 7 spaces for the community centre and management facility.
- 21.8 The cycle parking spaces are all located securely and conveniently within each plot in accordance with policy 6.9.
- 21.9 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. No roads are proposed as part of this application as the roads servicing this plot have already been consented under separate applications with part now being constructed. Well-landscaped routes are created on the borders of the application site. A pedestrian and cycle route is to be created adjacent to Southern Park and an access link is to be created from the masterplan across the swale to the Park. Further detail of materials and landscaping will be provided by condition.

21.10 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.

22.0 Air Quality

22.1 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.

22.2 The reserved matters application is supported by a letter from Rambol (dated 20/11/2019) 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.

23.0 Waste

23.1 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. This is supported by draft London Plan policy S17.

23.2 The proposed includes details of the refuse storage and collection to be provided for future residents. The townhouses will have space internal to those units for refuse. Two refuse storage areas are provided for the apartment units. Access to the refuse stores will be from Rennie Street or via the car parks internally. One refuse store will serve 55 properties and includes provision for 17 mixed dry recycling, residual waste and organic recycling bins. The other refuse store serves 60 units and includes provision

for 19 mixed dry recycling, residual waste and organic recycling bins. The total number of bins to be provided for the community centre and management facility for mixed dry recycling, residual waste and organic recycling is yet to be determined as an end user is not in place. As such, a condition shall be imposed that details shall be provided prior to the occupation of that use. The bulk storage areas in the refuse stores of Plot 203 will be separated from the general waste and recycling bins.

23.3 It should also be noted that the outline consent is subject to a condition requiring further information to be submitted. The strategy proposed as part of this application is considered acceptable with further detail due under the submission of conditions and the café provision to be subject to an additional condition attached to the reserved matters consent. The information has been reviewed by the Waste Service team and has been found to be acceptable.

23.4 As such, it is considered that waste strategy for Plot 203 is acceptable.

24.0 Areas of High Archaeological Potential (AHAPs)

24.1 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.

25.0 Flood Risk

25.1 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. Draft London Plan policy D11 requires development to maintain a safe and secure environment to ensure it is resilient against emergencies including flooding.

25.2 Various strategy statements and plans have been provided in support of the application to demonstrate compliance with the flood risk requirements. The green and brown roofs along with the eco-swale are proposed as sustainable drainage systems as part of the drainage strategy for Plot 203. The drainage from the hardstanding, shall be discharged into the adjacent drainage networks installed in earlier phases of the GMV masterplan. The details provided also include plans for foul sewer drainage. The application has been reviewed by a Flood Risk Assessor and is found to be acceptable.

26.0 Fire Safety

26.1 Draft 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.

26.2 Draft 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

26.3 A Fire Strategy has been submitted as part of the application. The report has been prepared by fire engineering consultancy OFR Consultants, the project leader for GMV Plot 203 is the Associate Director who has the following qualifications CEng BEng MIFireE. The applicant asserts as follows:

- Provision for access by fire and emergency vehicles: These are located close to the entrances to Cores A and B, in the Northern Square and off West Parkside respectively.
- Provision for evacuation: As with all residential developments, the fire strategy is compliant with the principle of “stay in place” set out in Building Regulations and associated British Standards. There are clear and protected routes for means of escape that lead directly to open space at street level.
- Detailed fire safety and protection measures: Fire prevention, protection and detection methods are described in detail in the report.

26.4 Further details to demonstrate compliance with policies D5 and D12 of the London Plan would be requested via condition.

27.0 Legal Agreement

27.1 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.

27.2 The S106 Agreement dated 30th March 2012 for the Outline Planning Permission (Ref I2/0022/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

27.3 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

28.0 Community Infrastructure Levy (CIL)

- 28.1 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1st April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £35 per square metre.
- 28.2 As the Outline Planning Permission was granted consent prior to the 1st of April 2012, the development is not be liable for CIL.

29.0 Implications for Disadvantaged Groups

- 29.1 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.
- 29.2 Access to and within the development for persons with physical disabilities will be improved.
- 29.3 The proposal will provide new job opportunities in the construction phase.
- 29.4 The application will provide affordable housing on the site.
- 29.5 The community centre will provide a positive facility space for members of the community.
- 29.6 All new housing will be constructed to Lifetime Homes standard.
- 29.7 10% of the new housing will be designed either to full wheelchair standards or to be easily adaptable to wheelchair standard housing.

30.0 Conclusion

- 30.1 The proposal is considered acceptable in principle and is in substantial accordance with the outline consent.
- 30.2 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 an additional obligation for affordable housing provision.
- 30.3 The community space complies with the requirements of the masterplan to deliver positive facilities for the community.
- 30.4 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.
- 30.5 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.
- 30.6 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.
- 30.7 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.
- 30.8 The impact on biodiversity has been considered by an independent assessor and has been found to be acceptable.
- 30.9 The play space provision is sufficient to serve the requirements of the residents so far.
- 30.10 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.

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