

Applicant: Mr P Gjelaj

Agent: Proun Architects, 90 Borough High Street, London, SE1 1LL

Site Address:

I-3 Hillreach, Woolwich, SE18 4AJ

Ward:

Woolwich Riverside

Application Type:

Full Planning Permission

I.0 Recommendation

- I.1 The Board is requested to Refuse Planning Permission as outlined below:
Demolition of the existing buildings and construction of a part 3/part 4/part 5 storey building including basement level, comprising of two replacement employment units (Use Class B1(c)) and 23 residential units with associated landscaping, cycle parking, and refuse storage.

for the following reasons:

Reason 1 (Poor contextual design)

The proposal, by reason of the height, scale and siting of the principal elevation to Hillreach, will appear as an extension to the building on the adjacent corner plot to the east which would have the overall effect of creating an unduly large and incongruous form of development within the street scene, creating a visually discordant relationship with the adjacent terrace to the west. As such the proposal would be contrary to Policy 7.4 of the London Plan (2016), Policy D3 of the Intend to Publish London Plan (2019), and Policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

Reason 2 (Harm to the setting of a Listed Building)

The proposal, by reason of the height, scale and siting of the principal elevation to Hillreach, will appear as an extension to the building on the adjacent corner plot to the east which would have the overall effect of creating an unduly large and incongruous form of development which would dominate the street scene and have an unsympathetic relationship to the Grade II listed Green Hill Garrison School situated directly opposite the

application site. As such the proposal would cause less than substantial harm to the setting of this heritage asset. In accordance with paragraph 196 of the NPPF, the public benefits of the scheme are not considered to outweigh this harm and therefore the proposal is contrary to Policy 7.8 of the London Plan (2016), Policy D3 of the Intend to Publish London Plan (2019) and Policy DH3 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

Reason 3 (Quality of Accommodation)

The development, by reason of the provision of residential accommodation at lower ground floor level that would result in an unacceptably poor outlook and a sense of enclosure to 4 units exhibits clear signs of overdevelopment that would result in a poor quality of accommodation for the future occupants of the site, contrary to Policy 3.4 of the London Plan (2016), Policies D3 and D6 of the Intend to Publish London Plan, and Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

Reason 4 (Adverse Impact on Neighbouring Amenity)

Due to the proposed height, scale, depth and siting of the proposed building, the development would create an overbearing impact and sense of enclosure to the existing residential dwellings at 1-5 Ogilby Street, and residential units within the approved adjacent scheme to the east (Ref. 17/2771/F). The proposed development is therefore contrary to Policy 7.6 of the London Plan and Policy DH(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

Reason 5 (Lack of s106 agreement)

The proposal, by reason of the lack of a s106 agreement or unilateral undertaking to secure necessary planning obligations including, affordable housing, travel plan, parking restrictions for future occupants, car club membership, participation in GLLaB, details of fit-out and marketing of the BI(c) units and carbon off-set payment would fail to maximise the delivery of affordable housing and fail to mitigate its impact on local infrastructure and the environment contrary to policies H3, EA(c), EI, IMI, IM4 and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014) and the Planning obligations (s106) Guidance SPD (July 2015) and Policy E2 of the Intend to Publish London Plan.

2.0 Summary

2.1 Detailed below is a summary of the application:

The Site	
Site Area (m ²)	656
Local Plan Allocation	None
Heritage Assets	<ul style="list-style-type: none"> • Setting of a Listed Building • Adjacent to Woolwich Common Conservation Area
Tree Preservation Order	No
Flood Risk Zone	Flood Zone 1

Proposed Building	
Building height (metres)	10.35 - 14.26 metres
No. of storeys	Part 3, part 4, and part 5 storeys
Floor area (m ²) (GIA)	23 x Residential Units – 1,530m ² 2 x Commercial Units (Total) – 212m ²

Housing		
Density	Units per Hectare (u/ha) and Habitable Rooms per Hectare (hr/ha)	351 u/ha 975 hr/ha
Dwelling Mix	Studio (no. / %)	5 / 22%
	1-bed (no. / %)	6 / 26%
	2-bed (no. / %)	6 / 26%
	3-bed (no. / %)	6 / 26%
Affordable Housing / Tenure Split	Overall Affordable Housing (no. / %)	3 / 13%
	London Affordable Rent (no. / %)	2 / 9%

	Intermediate / Shared Ownership (no. / %)	1 / 4%
	Private (no. / %)	20 / 87%
	Commuted Sum	No
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes

Non-Residential Uses		
Existing Use(s)	Existing use (Classes) / Operator	MOT Garage (Use Class B2)
	m ²	177
Proposed Use(s)	Proposed use(s) (Classes) / Operator	Use B1(c)
	m ²	212m ² (2 x 106m ²)
Employment	Existing Number of Jobs	3 FT / 2 PT
	Proposed number of jobs	5FT

Transportation		Commercial	Residential
Car Parking	No. Existing Car Parking Spaces	12	0
	No. Proposed Car Parking Spaces	0	0
	No. Proposed Blue Badge Car Parking Spaces	0	1 (On-street – based on need)
	Proposed Parking Ratio	0	0
Cycle Parking	No. Proposed Cycle Parking	40 Long Stay,	

		4 Visitor Spaces, and 1 cycle store within each commercial unit
Complies with policy		Yes
Public Transport	PTAL Rating	4
Public Consultation		
Number in support	1	
Number of neutral	0	
Number of objections	19 (21 in total - 2 from two objectors)	
<p>Main issues raised</p> <p>Issues raised are referred to in section 7.8 of the report and assessed within the considerations identified in section 9.0 of this report.</p>	<ul style="list-style-type: none"> • Excessive density / Overdevelopment • Further pressure on congestion of the surrounding roads and parking demand • Construction Impacts – Noise, Vibration, Dust • Impact on privacy – overlooking on to neighbouring properties • Impact on setting of Listed Building and Woolwich Common Conservation Area • Design and scale out of character with surrounding area • Reduction of daylight and sunlight to neighbouring properties • Inadequate bin collection • Impact on outlook from neighbouring properties 	

3.0 Site Plan



Figure 1: Site Plan

4.0 Site and Surroundings

- 4.1 The application site is located on the northern side of Hillreach. Hillreach moderately slopes to the west. It is currently occupied by Abbey Autos an MOT Test Centre, with parking forecourt, and one single residential unit adjoining its western boundary towards the rear of the site.
- 4.2 The application site is bounded by the Kings Arms pub to the east and The Village Blacksmith pub to the west. Both pubs are vacant. The site of the Kings Arms has current planning approval for a mixed-use scheme (17/2771/F), and the site has currently been demolished, and the construction process commenced. Aside from the pubs, the northern side of Hillreach is residential in character with a somewhat homogenous built form. The building heights follow the slope of the road.
- 4.3 There is a brick wall running the length of the southern side of Hillreach. Opposite the application site is the Grade II Listed Building (Green Hill Garrison School) set behind a parameter wall with the built form then being replaced by dense landscaping when travelling further west on Hillreach. This area forms the boundary of the Woolwich Common Conservation Area.
- 4.4 The rear of the site is primarily characterised by the blocks of flats on Ogilby Street. A newer development sits to the rear of the application site and is set

back from the street frontage. The land levels also vary. Directly to the rear is an area of car parking for local residents.

5.0 Relevant Planning History

5.1 The planning history for the site, together with the adjoining plot are summarised below.

5.2 Application Site

17/2558/F - Demolition of the existing buildings and construction of a part 3/part 5 storey building including basement comprising of 32 residential units (16x1 bed, 10x2 bed and 6x3 bed) with associated landscaping, cycle parking and refuse storage. *Withdrawn.*

5.3 Adjoining site – Kings Arms

17/2771/F - Demolition of existing building and construction of a Public House (Class A4) at basement and ground floor level and 19 residential units (10 x 1 bed, 5 x 2 bed and 4 x 3 bed) above with associated landscaping and parking. *Approved – 21/01/2019.*

11/3032/F - Demolition of existing pub and erection of a part three, part four-storey building comprising a replacement pub at basement and ground floor level with 12 flats above (4 x 1, 5 x 2 & 3 x 3 bed) and 10 parking spaces. *Approved – 02/04/2015. Permission Expired.*

6.0 Proposals

6.1 The proposals seek to redevelop the site to provide a part 3/part 4/part 5 storey building including basement, comprising of two replacement employment units (Class B1(c)) and 23 residential units with associated landscaping, car parking, cycle parking and refuse storage. To facilitate this all buildings and structures are proposed to be demolished on the site.

6.2 The proposed 23 residential units, includes 5 x studios (22%), 11 x 1 bed (26%), 6 x 2 bed (26%) and 6 x 3 bed (26%). These proposed residential units are served by one entrance and access core. The commercial units are accessed at the ground floor and are across two levels, which includes the lower ground floor.

6.3 The proposed development would have a flat roof form, with the part 3 element adjoining The Village Blacksmith property to the west. Moving along the principal elevation to the east, the height quickly raises to a four storey and five storey height that continues across to the Kings Arms site. It should be noted that the

five-storey element is set back, and the three and four storey elements facilitate roof terraces. The principal elevation is defined by the fenestration and balconies that face onto the street, and at ground floor level provides the entrance to the residential core, and separate entrances to the two commercial units.

- 6.4 The proposed rear elevation includes multiple projections that facilitate the residential unit configurations. The central element of the lower ground floor projects to the rear boundary of the site, the areas either side of this projection form gardens for the four duplex apartments located on the lower ground and ground floor. The ground floor also extends to the rear boundary, but is recessed on both sides to allow for two terraces. The central element of the first and second floor recedes further towards the main rear wall of the proposed development, and includes two balconies that face in a west and east direction. The third floor footprint reflects that of the main building and includes the roof terrace towards the western elevation. The fourth floor is flush to the main rear elevation of the building and the east elevation, but is recessed from the front and western elevation to facilitate roof terraces.
- 6.5 The appearance of the proposed development would be finished in predominantly face brick, metal framed windows, metal balconies with solid soffits and metal railings to the balconies. The face brick finish is Wienerberger Forum Smoked Branco, and the balcony balustrade and windows will appear as quartz grey.
- 6.6 The waste store is accessed directly from the street and the cycle store is located on the lower ground floor accessed via the lift.

Revised Development Proposal

- 6.7 The proposed development was revised due to comments received and discussions with officers. The following changes were made:
- Inclusion of two proposed commercial units and removal of the two on-site blue badge spaces, replaced by one off-street blue badge space proposed on Frances Street.
 - Alteration to lift size that provides access to the residential units.
 - Alteration of two lower ground floor units from 4-bedroom to 3-bedroom.
 - Four one bedroom units replaced with four studio units.
 - Amendments to the residential entrance to improve legibility.
 - Amendment to the flexible commercial uses proposed, with Use Class BI(c) now the only single use proposed for both commercial units.
 - Increased floor area of the lift to allow cycle access from the lower ground to ground floor.

- Amendments to design detailing at the front elevation.
- Removal of lightwells at the principal elevation, replaced by planting.
- Relocation of cycle storage on lower ground floor.
- Inclusion of a Sheffield stand at the principal elevation for two visitor cycle spaces.
- Alteration of chamfered windows at the rear projection to a 90 degree orientation west and east, including reconfiguration of terraces at ground floor, first floor and second floor.
- Removal of third floor terrace to the rear.
- Minor amendments to layouts of the residential facing the rear.
- Depth to the main rear elevation has been reduced to increase the distance from the rear elevation of the Ogilby Street properties.
- Multiple amendments to the internal layouts following comments from Occupational Therapists, and planning officers.

7.0 Consultation

7.1 The current application has been subject of public consultation, comprising a press notice, site notices and 138 letters, sent to individual occupiers in the vicinity of the application site. Along with the individual letters, consultation also included eleven (11) statutory bodies and local amenity groups. A second full consultation was undertaken on the 10th July based on amendments to the scheme, and a change in description.

Statutory Consultees

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

Details of Representation and Date Received	Summary of Comments	Officer's comments
Transport for London - TfL	TfL initially raised issues regarding: Car Parking - No need for the disabled persons' parking place on Frances Street to be provided initially, as evidence shows that	Noted. Issues relating to Transport and Access are assessed in section 16 of this report.

	<p>the occupation of new developments by disabled residents is very low.</p> <p>Cycle Parking</p> <ul style="list-style-type: none"> -Lift dimensions not large enough for cycles. -Only one lift proposed is not supported in case of failure. -The details do not include 5% of cycle parking spaces being spaces for large cycles. -Aisle widths are not adequate for two-tier system. -Do not support cycle parking within residential units. <p>All items have been addressed, except that one lift is still only proposed. This point is addressed in paragraph 16.10 of the main report.</p>	
Historic England	Confirmed no comment.	Noted.
Crime Prevention Officer/Metropolitan Police	No objection subject to a 'Secured by Design' condition. An issue has been raised regarding fencing and access to the first floor balconies at the principal elevation. The fencing has been removed as part of amendments.	Issues relating to Safety and Security are assessed in section 24.0 of this report.
London Fire and Emergency Planning	No comment received.	Noted.
UK Power Networks	No comment received.	Noted.
Scotia Gas Networks (SGN)	No comment received.	Noted.

NHS England	No comment received.	Noted.
London City Airport	Confirmed no comment.	Noted.

Council Departments

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

Details of Representation and date received	Summary of Comments	Officers comments
Highways	No objection to the scheme was confirmed by the highways officer subject to securing of appropriate conditions, and legal agreement.	Noted. Issues relating to highways are assessed in section 16.0 of this report.
Conservation	Raises objection, with the following key points: -It's design could be better represented to be respectful of the adjacent terrace. -The proposed 5 storey building will have an impact to the setting of the heritage asset. -The proposed height will have an adverse impact upon the townscape character of the Woolwich Common Conversation Area and the designated heritage asset opposite. -The Council must also be mindful of the statutory duty to "preserve and enhance" the character and appearance of the conservation area,	Noted. Issues relating to heritage are assessed in section 13.0 of this report.

	heritage assets and their settings and accord it significant weight in this balanced judgement.	
Street Services - Waste	No objection raised, a clarification was required regarding the location of the drop kerb, details have subsequently been provided.	Noted. Issues relating to waste are assessed in section 20.0 of this report.
Environmental Health - Air, Noise / Odour	No objections, subject to conditions.	Noted. Issues relating to environmental health are assessed in section 18.0 of this report.
Environmental Health - Land Contamination	No objections, subject to conditions.	
Sustainability - Energy	No objection raised, subject to suggested condition, and clauses within a S.106 agreement.	Noted. Issues relating to sustainability are assessed in section 17.0 of this report.
Sustainability - Biodiversity	No objection raised, subject to suggested condition.	
Occupational Therapist	<p>No objection to the further details submitted. There are areas identified that are non-compliant. However conditions requested to attach to any permission given associated will ensure compliance with M4(2) and M4(3).</p> <p>The occupational therapist has also confirmed that whilst the blue badge space indicated is a notable distance from the entrance to the site, it appears there is no other safe</p>	Noted. Issues relating to accessibility are assessed in section 14.5 – 14.9 of this report.

	solution, therefore the details are considered acceptable.	
Public Health	No objection. A comment was provided confirming all the units with some outdoor living space, in the form of gardens, patios, terraces and balconies. We recognise that the proposed landscaping and living roofs will enhance biodiversity and improve air quality.	Noted.
Flood Risk Officer	No objection, subject to conditions.	Noted. Issues relating to flood risk are assessed in section 19.0 of this report.
Tree Officer	No comment received.	Noted.
Education	No comment received.	Noted.
Parks and Open Space	No comment received.	Noted.

Amenity Groups

- 7.4 A summary of the consultation responses received from amenity groups, along with the officer comments are set out in table below:

Details of Representation and date received	Summary of Comments	Officers comments
Speak Out Woolwich	<u>No comment received.</u>	
Greenwich Conservation Group	<u>No comment received.</u>	

Local Residents and Businesses

7.5 Consultation letters were sent to 138 local residents and businesses, 19 objections were received by the Council.

7.6 A summary of the objections received (and relating to planning matters) are set out in table below:

Summary of Comments	Officers comments
<p>Impact on setting of Listed Building and Woolwich Common Conservation Area</p> <p>Design and scale out of character with surrounding area</p>	<p>Issues relating to Design Quality, Townscape and Heritage Impact, are assessed in section 13.0 of this report.</p>
<p>Overdevelopment of the site</p>	<p>Issues relating to Density are assessed in section 11.0 of this report.</p>
<p>Impact on privacy – overlooking on to neighbouring properties</p> <p>Reduction of daylight and sunlight to neighbouring properties</p> <p>Impact on outlook from neighbouring properties</p>	<p>Issues relating to impact on adjoining residential properties are assessed in section 15.0 of this report.</p>
<p>Increased congestion around the site and increased parking demand</p>	<p>Issues relating to Transport and Access are assessed in section 16.0 of this report.</p>
<p>Construction Impacts – Noise, dust and vibration</p> <p>Operational Development - Noise</p>	<p>Issues relating to Noise and Air Pollution are assessed in section 18.0 of this report.</p>
<p>Inadequate bin collection</p>	<p>Issues relating to waste are assessed in section 20.0 of this report.</p>

Loss of property value	This is not a planning consideration.
Obstruction of neighbouring property	Based on the submission it appears that the proposed development is within the boundary of the site owned by the applicant.
Impact on local amenities	The development is subject to mayoral and local CIL, see section 22 and 23.

7.7 One comment of support was received that highlighted the scheme was a positive continuation of the regeneration within the area.

8.0 Planning Context

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

- **National Planning Policy Framework (NPPF) (2019)**
- **Technical Housing Standards – Nationally Described Space Standard** (Department for Communities and Local Government – March 2015)
- **London Plan (2016)** - Full details of relevant policies refer to appendix 3.
- **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” – 2014)** - Full details of relevant policies refer to appendix 3.
- Full details of relevant SPD / Documents refer to appendix 3.

8.2 The Intend to Publish London Plan (December 2019) has been through the required consultation process, and Examination in Public (EiP), and is due to be adopted later in 2020. Officers consider due to the imminent publication of this document the relevant policies within the new London Plan do have substantial weight, and will be referenced and referred to in this report, and do inform Officers recommendation.

9.0 Material Planning Considerations

9.1 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 (18/4454/F):

- Principle of development
 - Loss of existing employment use
 - Employment use re-provision
 - Proposed residential use
- Density
- Housing Mix and Affordable Housing
- Design Quality and Heritage Impact
- Quality of Living Environment Provided for Future Residents
- Impact on adjoining residential properties
- Transport and Access
- Sustainability and Energy
- Noise, Air Pollution, and Land Contamination
- Flood Risk
- Refuse Provision
- Safety and Security
- Community Infrastructure Levy (CIL)
- RBG CIL
- Legal Agreement
- Implications for Disadvantaged Groups

10.0 Principle of development

10.1 The National Planning Policy Framework (NPPF) is a set of national guidelines from which the principles of modern planning are cascaded into local planning policy, and is a material consideration in the determination of planning decisions. At the heart of the NPPF is the presumption in favour of sustainable development, which has three overarching interdependent objectives: economic prosperity, social inclusion, and environmental enhancement.

10.2 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, and it requires the Council to make the most effective use of land for homes and other uses whilst safeguarding and improving the environment, ensuring safe and healthy living conditions, and maximising the re-use of previously developed 'brownfield' land.

Loss and re-provision of employment use

10.3 The proposed development seeks to remove the existing B2 use, that is currently operating as an MOT centre. The proposed scheme includes a replacement

employment use, in the form of Use Class BI(c) for two proposed units across ground floor and lower ground floor.

- 10.4 The Intend to Publish Draft London Plan Policy E7 identifies that mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where there is no reasonable prospect of the site being used for industry, logistics and services to support London's economic function; or it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or industrial, storage or distribution floorspace is provided as part of mixed- use intensification.
- 10.5 Core Strategy Policy EA(a) seeks to ensure that land in employment generating uses continues to generate employment. It sets three tests for schemes that seek to take land out of employment generating use: the site must be environmentally or physically unsuitable for any employment generating use; marketing on fair price and terms for at least two years must indicate that there is no realistic prospect of any form of employment arising; or employment is only viable within a mixed use scheme. The supporting text of the policy sets out the evidence that must be provided to the LPA in order to demonstrate the site meets all of the three criteria.
- 10.6 To ensure the proposed BI(c) use commercial space is fit for purpose, Policy E2 of the Intend to Publish Draft London Plan (2019) confirms provision of a sufficient supply of business space of different types, uses and sizes will ensure that workspace is available for occupation by SMEs and businesses wishing to start-up or expand. It will also help to ensure that workspace is available at an appropriate range of rents. Development of business space should ensure at least a basic fit-out, and proposed units are not compromised in terms of layout, street frontage, floor loading, floor to ceiling heights and servicing, having regard to the type and use of the space. This should take into account the varied operational and servicing requirements of different business uses.
- 10.7 The application includes the re-provision of an industrial use as part of the proposed development in the form of two commercial units as use class BI(c), with each unit being 106m² that totals 212m². Officers consider this complies with emerging London Plan policy E7, as the requirement within the guidance states, developments should be proactive and encourage the intensification of businesses that include use class BI(c). Furthermore, the HCA Employment Densities Guide (2010) confirms the area per FTE (Full-time employee) for use class BI(c) is 47m², which would indicate the two units can provide employment for 5 FTE's, in comparison to the 3 FTEs and 2 PTEs (Part-time employee) as part of the existing use.

10.8 Officers consider the re-provision of industrial floorspace is compliant with the emerging London Plan Policy E7, and the Core Strategy (2014) Policy E(a), as it maximises the employment provision within a compliant use, that allows for a mixed use scheme. Furthermore, the applicant has provided business accounts relating to the existing use, which provides evidence that the viability of the existing MOT garage is being impacted by market conditions, and future emission zones to be implemented in the borough. Specifically, the longer warranties for new cars which means repairs would have to be done at the associated car dealership, and the Ultra Low Emission Zone (ULEZ) is to be extended to the north and south circular from October 2021. The ULEZ would provide a greater shift towards the use of hybrid and electric cars which requires a different type of servicing than what is currently provided by the current business. As such, officers consider, based on this evidence, that a re-provision of two B1(c) industrial units with the co-location of residential is acceptable and can benefit the long-term sustainability of the site. The suitability of co-location will be discussed within the neighbouring amenity and noise, air quality, and land contamination sections.

10.9 The applicant has provided a response to the GLA good practice for non-residential uses in mixed-use schemes checklist (Vacant Ground Floors in New Mixed Use Development - GLA 2016). This checklist tries to ensure a reasonable prospect that all proposed commercial units would be occupied, and seeks to maximise the prospect. Whilst officers consider the details quite minimal, the details do confirm the flexibility of the units in terms of size that can be adjusted at lower ground floor, the servicing, and that the units will be marketed based on the market rate for its location. Officers consider these details acceptable in relation to the emerging London Plan Policy E2. It is considered however that more details should be provided for these units relating to fit-out and marketing within the s.106, if permission is given.

Proposed Residential Development

10.10 Paragraph 59 of the NPPF (2019) states that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”. Paragraph 68 further states that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”.

10.11 Policy H1 of the Core Strategy sets out the Royal Borough’s current target for the plan period and asserts new housing will mainly be delivered in the six Strategic Development Locations (identified in Section 3.3). The site does not form part of an area of land designated in the Site Proposals Schedule (site

allocation carried forward from the UDP and listed in the Addendum to the Local Plan). The supporting text notes the existing shortage of appropriate housing in the Royal Borough and the increasing need for additional housing. The Core Strategy is consistent with the NPPF in that there is a presumption in favour of sustainable development.

- 10.12 Policy 3.3 of the London Plan sets out that the Mayor will seek to ensure that identified housing need is met, particularly through provision consistent with at least an annual average of 42,000 net additional homes across London which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners. Policy 3.3 further sets out that boroughs should seek to enable additional development capacity to be brought forward to supplement the borough's housing target, and this additional capacity can come from a range of sources including intensification, redevelopment and the sensitive renewal of existing residential areas. Moreover, Policy 3.4 of the London Plan requires development to optimise housing outputs, taking into account local context and character, public transport capacity, and good urban design principles.
- 10.13 The proposed development seeks permission to redevelop the site for residential uses, providing 23 homes. This land use would be consistent with the wider area, that as previously identified, is predominantly residential and comprises mostly low-rise residential housing. It is considered that the commercial use on the ground floor is compatible in principle with the residential use on the upper floors, and this follows the existing permission (17/2771/F) found on the adjoining Kings Arms site, and properties at the southern end of Frances Street. It is therefore considered a residential led mixed use scheme in this location is acceptable.
- 10.14 On this basis Officers consider the principle of development acceptable in land use terms and the proposed development would make efficient use of a brownfield site, subject to compliance with the aims and objectives of wider policy considerations.

11.0 Density

- 11.1 Policy 3.4 of the London Plan seeks to ensure that the housing potential of sites is optimised as outlined in the relevant density range shown in table 3.2 of the London Plan. Table 3.2 takes into account location, existing building form, massing and Public Transport Accessibility (PTAL). The PTAL rating is used as a means of quantifying and comparing the accessibility of public transport for a site.

- 11.2 The PTAL rating for the site is 4 (where 0 is the worst and 6 is the best accessibility). The development would be categorised into the 'Urban' setting in Table 3.2 of the London Plan. According to the policy, the appropriate density range for the site would be 200–700 hr/ha and 70–260 u/ha. The application proposes 23 residential units, equating to 351 u/ha, and 975 hr/ha. As such the proposed development has roughly 35% greater amount of habitable rooms per hectare than the London Plan guidance, and 39% greater with regards to units per hectare.
- 11.3 The London Plan (2016) states that the density matrix should not be applied mechanistically, without being qualified by consideration of other factors and planning policy requirements. Furthermore the Mayor's Affordable Housing and Viability SPG (2017) states where a scheme meets the 35 per cent affordable housing threshold it may also be appropriate to explore the potential to increase densities on a case-by- case basis to enable the delivery of additional affordable homes where this meets exemplary design standards.
- 11.4 Policy D3 of the Intend to Publish London Plan (2019) confirms that the development capacity of a site, and the best use of land, should be considered and assessed through a design-led approach. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. The key aspects of the design-led approach include the form and layout, user experience, the character of the design in the context of its location, and high quality and sustainable design standards.
- 11.5 Based on the assessment of the proposed development against the guidance within the emerging Policy D3 of the Intend to Publish London Plan (2019), officers consider that the proposal constitutes overdevelopment in this location as the experience of future occupants in the duplex units would result in poor outlook and sense of enclosure on the lower ground floor units to the rear. Additionally, the proposed development does not respond to the character of the locality, and the scale and height of the proposal does not respect the setting of the Grade II Listed Former Garrison School. Furthermore, the scale and massing created at the rear of the proposed development does not respond accordingly to the scale, orientation, and proximity of the neighbouring properties at 1-5 Ogilby Street, and future occupants within the approved Kings Arms scheme, creating a negative experience that would create an unacceptable loss to the amenity of neighbouring properties.

11.6 It is indicated that the density of development is higher than the currently adopted guidance in relation to the currently adopted London Plan (2016) for a site in this location; furthermore Policy D3 of the emerging London Plan indicates the proposed development is also overdevelopment relative to a design led review of the proposed development. Therefore whilst this on its own does not constitute a reason for refusal, other aspects of the design of the scheme need to be examined against the density. These are discussed within the detailed consideration further on in this report where it is demonstrated that the scheme exhibits a number of symptoms of over development which supports the view that the proposals are inappropriate in their scale and the detrimental impacts of this development are a result of the high density nature of the scheme.

12.0 Housing Mix and Affordable Housing

Housing Mix

12.1 Policy 3.8 of the London Plan seeks to ensure that new developments, offer a range of housing choices in terms of mix of housing sizes and types, and regard should be had to the needs of particular communities with large families and the range of needs of different age groups.

12.2 Policy H2 of the Royal Greenwich Local Plan states that a mix of housing types and sizes will be required in all developments, including conversions, and developments should contain a proportion of 3, 4 and 4+ bedroom units. The exact mix on each site will vary according to the location of the development and the character of the surrounding area. This is further reinstated by London Plan Policy 3.8.

12.3 The breakdown of the housing mix proposed is as follows:

- 5 x studio (1 person)
- 6 x 1 bed (2 persons)
- 6 x 2 bed (3 persons)
- 6 x 3 bed (5 x 5 persons, 1 x 6 persons)

12.4 The proposed mix is skewed towards the provision of studio, one, and two bedroom units, with these units totalling a combined provision of 74% compared to a 26% provision of three-bedroom homes. Whilst there is no requirement to provide a specific level of family sized homes, it is noted that family units are generally in high demand within the borough and their provision is sought in all residential developments.

12.5 Taking into account the restrictions of the site's location and the viability of the development, officers consider the proposed mix of dwelling sizes and percentage of family units would maintain a mixed and balanced community, in accordance with relevant policy and guidance.

Affordable Housing

12.6 Policies 3.11 and 3.12 of the London Plan seek to maximise affordable housing provision over the term of the London Plan. Policy 3.12 states that negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy and provisions for reappraising the viability of schemes prior to implementation.

12.7 Policy H3 of the Core Strategy requires a minimum of 35% affordable housing. The precise percentage, distribution and type will be determined by the particular circumstances and characteristics of the site and of the development, including financial viability. The affordable housing that is provided should be provided as 70% social / affordable rented and 30% intermediate housing.

12.8 New developments creating 10 units or more must also have regard to the Mayor's Viability Supplementary Planning Guidance (SPG), which confirms that any proposal which achieves a provision equivalent to 35% of the overall number of units as being affordable (50% on public land), without grant, and meets the tenure mix, can benefit from the Fast Track Route which means there is no requirement to assess financial viability. For major developments which cannot achieve the 35% threshold for affordable housing (50% on public land) the proposed provision should be accompanied with supporting viability evidence, within a standardised format as prescribed within this SPG.

12.9 The originally submitted viability assessment concluded the proposed development would be unviable if it was to provide affordable housing, with a present value deficit of £523,824 on the overall scheme. This clearly does not meet the Council's requirement of 35%, as stated in Policy H3 of the Core Strategy (2014), and the minimum 10% requirement as stated in paragraph 64 of the NPPF. Following an independent assessment by BNP Paribas, it was considered that the residual land value of the site based on the proposed development was £1,360,000 which when compared to the Benchmark Land Value of £890,500 resulted in a surplus of £469,000. The applicant agreed with this conclusion, and based on a tenure split of 70% Affordable Rent and 30% Shared Ownership, offered three affordable units, to be provided on site with an additional £100,000 off-site contribution.

12.10 Due to the amendments to the scheme identified in paragraph 6.7, planning officers requested BNP Paribas carry out a sensitivity appraisal based on the alterations of the scheme to update the independent assessment conclusions. Subsequently the appraisal concluded the residual land value of the proposed development had change to £1,130,000, therefore based on the subtraction of the established Benchmark Land Value of £890,500, results in a reduced surplus of £239,500. The reasoning for this was due to the change of four beds to three beds and four one bedroom apartments being replaced by four studio apartments. This resulted in a loss of saleable area of approximately 550 sq.ft. The applicant agreed with this conclusion, and based on the closest tenure split to 70% Affordable Rent and 30% Shared Ownership, and to ensure a minimum of 10% affordable housing is provided in accordance with the NPPF (13% provided), three affordable units are proposed. These are shown in the table below.

Tenure	Total Units	% of total units (measured per unit)
London Affordable Rent	2	9%
Shared Ownership	1	4%
Total	3	13%

12.11 In conclusion based on the independent viability assessment and subsequent sensitivity appraisal for the proposed development it is concluded that the 35% affordable housing policy requirement is not achievable for this scheme, and the 13% offer including its breakdown is considered to comply with Policy H3 of the Core Strategy (2014), the London Plan Affordable Housing and Viability SPG (2017), and the NPPF (2019) as it is the maximum reasonable amount. The three units proposed as affordable, is a 3-bedroom 5 person wheelchair adaptable duplex unit on the ground and lower ground floor, a 2-bedroom 3 person unit on the first floor, and a 1-bedroom 2 person unit also located on the first floor. If officers were minded to approve the scheme this would be secured through the s106 legal agreement. Discussions would however have needed to take place with potential registered providers to understand whether there is a demand for these three units as Housing Associations will often only seek to take on a larger number of units in order to be able to manage them effectively.

12.12 In conclusion based on the independent viability assessment and subsequent sensitivity appraisal for the proposed development it is concluded that the 35% affordable housing policy requirement is not achievable for this scheme, and the 13% offer including its breakdown is considered to comply with Policy H3 of the

Core Strategy (2014), the London Plan Affordable Housing and Viability SPG (2017), and the NPPF (2019).

13.0 Design Quality and Heritage Impact

Policy Context

- 13.1 Paragraph 124 of the Revised National Planning Policy Framework (2019) states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 13.2 London Plan (2016) Policy 7.4 'Local Character' requires developments to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Policy 7.5 provides detailed requirements to inform the design of public realm in relation to movement routes. It expects development to make the public realm comprehensive at a human scale, using gateways, focal points and landmarks as appropriate.
- 13.3 Policy 7.6 'Architecture' states that buildings should be of the highest architectural quality, be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm and comprise details and materials that complement, not necessarily replicate, the local architectural character.
- 13.4 Policy DHI of the Core Strategy (2014), expects proposals to demonstrate an understanding of the existing context of the area and to promote local distinctiveness by providing a site-specific solution. The policy also requires developments to provide a positive relationship between the proposed and existing context, paying particular attention to the scale, height, bulk and massing of the adjacent townscape; and create attractive, manageable, well-functioning spaces within the site.
- 13.5 Policy DI of the Intend to Publish London Plan (2019) expects new developments to respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to local character. Policy D2 of the Intend to Publish London Plan places further weight on this process, requiring a clear understanding of the existing local context, including townscape, block pattern and urban grain, to form the basis of any proposal.

13.6 The application site is located adjacent to the corner plot on Frances Street and Hillreach to the east. This site has an existing permission for a part three, part four storey building with re-provision of a public house at ground and basement level. Adjoining to the west is an established terrace which dates from 1900 but does not have a formal heritage listing. It is modest in scale, distinctive and adds an interesting appearance to the street scene; this includes The Village Blacksmith Pub property.

13.7 The site is not within a Conservation Area itself, however, it is located opposite the Grade II listed former Green Hill Garrison School to the south, which is within the Woolwich Common Conservation Area. The site is therefore in a sensitive location.

Scale, Bulk, and Mass

13.8 The proposed development would introduce a part 3, part 4, and part 5 storey building on a currently low rise, and open site which is occupied by an existing MOT garage. The proposed development is three-storeys in height at the western boundary and rises sharply to four and five storeys across the principal elevation. The fifth-storey element is set back by 2.25m from the front elevation

13.9 Whilst the fifth floor of the proposed development is set back from the principal elevation, officers consider the scale and height created by the proposed development is a physical continuation of the Kings Arms permission (17/2771/F). This neighbouring site is a corner plot development, therefore in design terms it is more appropriate for the adjoining property to be larger in scale and height. The topography of the site exacerbates this issue as the land falls away from the corner plot along Hill Reach, therefore the continuation of this height along Hill Reach means it fails to appear subordinate to the corner plot location and therefore would be a dominant feature within the street scene.

13.10 Furthermore, the main height of the principal elevation appears as four storeys from the street scene, as the fifth floor is set-back and is not visible. The fourth storey element of the proposal drops to three storeys 3.25m from the western boundary, with the total width of the site being 25.5m. Officers consider the proposed development does not respect the established scale and character of the Blacksmith Village Pub, and the terrace this adjoining property is located in. This proposed development alongside the Kings Arms permission will create a visually jarring northern frontage to Hillreach, that appears as one large corner plot that dwarfs the 1900s terrace properties.

- 13.11 Officers consider the scale and height of the principal elevation unacceptable in the context of the site's location.
- 13.12 At the rear of the proposed development, the bulk and scale of the development steps down towards the rear boundary from its maximum height of 5 storeys, to 3 storeys, and down to a single storey. Due to the level change from east to west, the scale and bulk of the proposed development does appear much larger and deeper than the adjoining terrace properties to the west along the rear elevations, however as this is not visible from the street scene, officers consider this change in proposed scale in proportion to the neighbouring properties to be acceptable in design terms. It is also important to note that the façade on the eastern elevation would appear large in scale and mass in the context of the site's location, however as the Kings Arms site has a permission and works are currently on site, this will be hidden by this development.

Form and Layout

- 13.13 The entrances to the proposed development are via Hillreach at ground floor, with two separate entrances for the commercial units, and a separate entrance to the residential core. The waste storage area can be accessed directly from the street. To the rear of the development, four gardens are located on the lower ground floor to serve the duplex units on the lower two floors.
- 13.14 The proposed development has a flat roof form which matches the form of the approved Kings Arms development adjoining the site (17/2558/F) and is a common theme for recent developments towards Woolwich along Artillery Place. At the rear elevation of the proposed development, a rear projection steps down twice to ground floor level, both in a flat roof form.
- 13.16 The proposed development has a layout and orientation that seeks to replicate the existing spatial pattern of development along the northern side of Hillreach. Whilst the proposed building line does not fully align with either of the adjoining properties, being slightly more set back, this facilitates a wider pavement and improved pedestrian environment at the front of the site and allows for defensible space in front of the two residential units.
- 13.16 Officers consider the form and layout of the proposed development acceptable in design terms.

Appearance and materials

- 13.17 The proposed development would be finished predominantly in brick, the specification is Wienerberger Forum Smoked Branco. This is to be laid in half lap stretcher bond with semi-recessed natural mortar pointing, bands of vertical bond

brick, recessed panels and decorative panels of projecting hit and miss header pattern.

- 13.18 The proposed fenestration is double glazed and has aluminium framed casement in quartz grey ppc finish. The balustrade of the proposed balcony, parapet cappings, spandrel panels, and rainwater pipes is also proposed in quartz grey. The proposal also includes green roofs at the rear elevation.
- 13.19 Officers consider the grey contemporary appearance of the proposed facades provide suitable interest within the street scene, and whilst different to the appearance of the Kings Arms approval (17/2771/F), it is of similar style and quality. Furthermore the intermittent vertical pattern of fronting fenestration and inset balconies adds interest to the schemes design.
- 13.20 Officers consider the appearance and materials acceptable in design terms.

Impact on Heritage Assets

- 13.21 Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the general duties of Local Planning Authorities in regards to the protection of listed buildings and conservation areas. Section 66 states “In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” Section 72 states “In the exercise, with respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”
- 13.22 Paragraph 192 of the National Planning Policy Framework (NPPF) (2019) states that in determining planning applications all local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets. Furthermore, Paragraph 189 states that when determining applications, local planning authorities (LPAs) should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. This should be sufficiently detailed in order to allow the potential impact on the heritage significance and be proportionate to the heritage’s importance.

- 13.23 Paragraph 193 advises that when planning decision makers are considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
- 13.24 Paragraph 194 sets out that any harm to the significance of a designated heritage asset, including from development within its setting, should require clear and convincing justification. Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 13.25 London Plan (2016) policy 7.8 requires development affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Core Strategy (2014) policy DH(h) expects developments to pay special attention to preserving or enhancing the character or appearance of the Conservation Area. The local scale, the established pattern of development and landscape, building form and materials will all be taken into account.
- 13.26 The application site is adjacent to the Woolwich Common Conservation area and a designated heritage asset that is located directly opposite the application site on the other side of Hillreach approximately 23m distance, is the Grade II Listed former Greenhill Garrison School.

Impact on Greenhill Garrison School

- 13.27 The Historic England listing of the Grade II Listed former Greenhill Garrison School is as follows:

Early-mid C19 building. Road front to Hill Reach. 1-storey, 15-window pane with 2-storey, 1-window end wings. 5-window centre section projects slightly under pediment-like gable. End wings have moderately low pitched, slate roofs; centre roof renewed in corrugated asbestos. Multi-coloured stock brick with dentil cornices running across pediment. Round window in tympanum. Gauged brick arches to sash windows with glazing bars (some renewed) those in 5-bay centre section round headed in round arched arcading. The building is a roughly symmetrical block and the South front repeats the North except that there is a central double door and the side wings have 2 windows. On East and West fronts the section in centre is of 5 bays; and 1-storey entrance links lead to 2-storey, 3-window end wings with central doors under round arched fanlights. The East front has a central double door with radial fanlight.

- 13.28 The school was listed in 1973, it forms part of the Woolwich Barracks site and is positioned along the northern boundary. Whilst it is separated from the road by a high brick wall the building at part one, part two storeys is visible from the street and will be seen in the same context as the proposed development.
- 13.29 In views from the northern end of Repository Road and when approaching the site from the junction to the east, as highlighted already in this section, the proposed development due to its height creates a continued scale that appears to reflect that of the approved Kings Arms development (17/2771/F). The proposed building at part 4, part 5 storeys would effectively be double the height of the Garrison School and would be positioned directly opposite. This forms an uncomfortable relationship between the two and would result in the new development competing and being dominant to the smaller scale listed building. This unsympathetic relationship created would therefore cause harm to the setting of this listed building. Officers identify this specific harm as less than substantial harm to the significance of the Grade II Listed building, as such this harm should be weighed against the public benefits of the scheme.
- 13.30 Officers consider the public benefit of the scheme includes the provision of housing and affordable housing which stands at 13%, one off-site blue badge parking space, a marginal increase in employment opportunities on the site (3FTEs and 2PTEs to 5 FTEs), and pedestrian improvements in front of the site. As the affordable housing offer is not policy compliant against the 35%, and the pedestrian improvements could be provided regardless of the impacts to the listed building, officers consider the public benefits of the scheme are limited do not outweigh the harm to the setting of listed building, and this warrants a reason for refusal.

Impact on Woolwich Common Conservation Area

- 13.31 The Woolwich Common Conservation Area Appraisal (2014) identifies the northern area of the conservation area as the secluded barracks buildings visually surrounded by large historic walls and the barracks frontage. The northern area is characterised by its open character and military presence, which dominates the landscape within the Conservation Area boundaries.
- 13.32 The councils conservation officer confirmed in their view that the proposed height will have an adverse impact upon the townscape character of the Woolwich Common Conservation Area. However planning officers have reviewed the locational context of Hillreach and Repository Road which clearly forms a boundary where this open and militaristic character changes immediately to an established urban area with a clear residential and commercial purpose and already includes 5-6 storey developments on the highways surrounding the conservation area. Due to the general variety of height, age, and styles of buildings surrounding the Woolwich Common Conservation Area the significance of the conservation area relies more on the preservation of its own appearance and relationship of the military buildings within the Conservation Area.
- 13.33 As such, whilst in the context of the site's immediate location, the proposed development has been considered unacceptable, with regards to any impact on the Woolwich Common Conservation Area, officers consider the height, scale, and appearance of the proposed development would not substantiate any harm to its established setting, preservation, or character.

14 Quality of Living Environment Provided for Future Residents

- 14.1 Core Strategy Policy H5 seeks to ensure an adequate standard of accommodation to ensure satisfactory levels of residential amenity and quality of life for future occupiers.
- 14.2 The following table shows how the proposed units compare with the requirements of the Technical Housing Standards – Nationally Described Space Standards (2015):

Flat Type	Nationally Described Space Standards	Proposed units (m²)
Studio	39m ²	38.8 – 44.2

One Bedroom, two people	50m ²	50
Two Bedroom, three people	61m ²	61 – 67.3
Three bedroom, five people	70.0 m ²	91 – 122.6
Three bedroom, six people	86.0 m ²	91.4

14.3 All of the proposed units either meet or exceed the relevant size standards. However it should be noted that the ground floor terrace serving two of the duplex units does not meet the requirements of a balcony size. Garden spaces are provided - see aspect, outlook, privacy section below.

14.4 The London Housing SPG states that a minimum ceiling height of 2.5 metres for at least 75% of the gross internal area is strongly encouraged. The floor to ceiling heights will be at least 2.5m across all rooms within the development and therefore meets the requirements.

Accessible Housing

14.5 Policy H5 of the Core Strategy requires 10% of the dwellings be built to full wheelchair standards, or be easily adaptable for users who are wheelchair users. Policy 3.8 of the London Plan requires that 90% of units meet Building Regulations requirement M4 (2) ‘accessible and adaptable dwellings’ and 10% of new housing must meet Building Regulations requirement M4 (3) ‘wheelchair user dwellings’, i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

14.6 It is proposed to provide two, M4(3) wheelchair user dwellings, that are duplex units located on the ground floor and lower ground floor of the proposed development. These comprise of 2 x three bedroom units. It is considered the lift access provided to these two units complies with the required M4(3)(A) standards. The remaining 21 units have been designed to meet part M4(2) of the Building Regulations and as such have been designed to be step-free, which are accessed via the ground floor, or the lift provided within the core that will serve all residential floors with security controlled access to each floor.

14.7 The two accessible units to be provided within the scheme are identified as:

1 x 3B5P (Plot LG01 – Lower Ground Floor)

1 x 3B5P (Plot LG02 – Lower Ground Floor)

The layouts of the units have been reviewed and are generally considered acceptable, and can meet the required M4(2) and M4(3) Building Regulations. There are specific criteria highlighted by the RBG Occupational Therapists that have not currently been met with the relevant Building Regulations. However the RBG Occupational Therapists have confirmed this can be resolved at condition stage. Therefore, if permission is given relevant conditions will need to be applied to ensure that the required number of wheelchair units are provided and to ensure that all units meet the relevant Building Regulation requirements.

14.8 The proposed details include one blue badge parking space on-street 65m from the entrance to the site along Frances Street. It is acknowledged that this blue badge space cannot be assigned to a specific occupant within the development. The council's occupational therapists have reviewed this provision, and due to the highway restrictions of an onsite provision, it is considered that the provision of one space located on Frances Street is considered acceptable.

14.9 The proposed development therefore meets the objectives of Policy H5 of the Core Strategy and the requirements of London Plan Policy 3.5 and 3.8 and would provide an acceptable standard of accessibility for future occupants subject to conditions.

Amenity Space

14.10 Standard 26 of the Mayor's Housing SPG states that 'a minimum of 5sq.m of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant'. Balconies should be a minimum depth of 1500mm. Policy H5 of the Core Strategy states that in flats a good-sized balcony, a terrace or enclosed communal gardens should be provided and family housing should normally have direct access to a private garden.

14.11 All of the residential units proposed would include private external amenity space in the form of a garden, balcony, or terrace, of at least 5sq.m. All of the single storey units include the minimum depth and width of all proposed spaces which would be 1.5m, which is in line with Standard 27 of the Mayor's Housing SPG. It is noted that the balconies of the duplex units are below the required standards but these are in addition to a rear garden area provided for these units. The quality of amenity of these proposed rear gardens of the duplex units is discussed further within the quality of accommodation section.

14.12 The proposal does not include any communal amenity space, nor child play space. For a development of this size, Policy OS(c) of the Core Strategy (2014) does not require a provision of open space. Furthermore, based on the quantum, mix, and tenure of the residential units proposed, the Mayor's SPG Playspace Calculation Spreadsheet confirms the projected child population would be below 10, which is the threshold for a required provision.

Daylight and Sunlight

14.13 A BRE Assessment (Daylight & Sunlight Assessment prepared by T16 design) has been carried out for the internal daylight and sunlight levels within all of the proposed units. The daylight and sunlight calculations to conclude daylight and sunlight levels have been undertaken in accordance with the 'BRE Guide'.

14.14 The BRE Guide recommends in new dwellings, the minimum average daylight factor (ADF) is 1 % for bedrooms, 1.5% for living rooms, and 2 % for kitchens. The submitted assessment confirms that all 64 rooms meet the recommended guidance levels. The lower ground floor rooms to the rear had the lowest results ranging from 2.52 – 2.81%.

14.15 During the determination period of the application officers requested further assessments relating to the daylight levels of the proposed units for the duplex units that are formed by the ground and lower ground floor levels to the rear of the proposed development.

14.16 The Daylight Distribution Test analyses the position of the no sky line (NSL). In new developments, the BRE guide states that no more than 20% of a room's area should be beyond the NSL. The assessment confirms that 6 out of 16 rooms are above the BRE standard. A further 6 rooms are within no more than 30% of the floor area not receiving direct daylight. The remaining rooms are within 50%, and one room has over 60% no direct daylight. It is considered that, taking into account an urban setting and modern designs of large living/dining areas, it is suggested that 'a significant area' should be interpreted as more than 50% (British Standard 8206-2). Therefore it would be usual to have less than 50% of the room area in front of the no-sky line. In this instance the ADF levels should be followed.

14.17 Annual Probable Sunlight Hours (ASPH) have been assessed for all the principal habitable rooms within the proposed development. ASPH means the total number of hours in the year that the sun is expected to shine on unobstructed ground. If the ASPH tests reveal that the new development will receive at least one quarter of the available ASPH, including at least 5% of ASPH during the

winter months (from 21 September to 21 March), then the requirements are satisfied.

14.18 Projected sunlight levels have not been provided for the proposed units, with the justification that the daylight levels provide the evidence that the proposed units provide good levels of natural light. Furthermore, the windows on the rear elevation of the proposed development face directly north. Under the BRE guidance, units that are not within 90 degrees of south are not subject to the sunlight requirements.

14.19 On balance whilst the daylight levels of the two lower floors do have identified breaches, these are considered acceptable in the context of the site's urban location.

Aspect, outlook, privacy

14.20 The London Housing SPG states that developments should minimise the number of single aspect dwellings. It also states that single aspect dwellings that are north facing, exposed to significant noise levels or containing three or more bedrooms should be avoided. Policy H5 of the Core Strategy includes a presumption against single aspect north facing units and a presumption in favour of dual aspect units where possible. Of the 23 units proposed, 16 units (70%) are dual-aspect within the proposed development.

14.21 Officers do note however that the main living areas of the duplex units are located on the lower ground floor, these look out onto the garden spaces for each unit. These garden spaces have at least one boundary that is 3.9m in height, and one boundary is formed by the elevation of the proposed development (between 4 -6 storeys). The depth of these garden areas to the 3.9m boundary ranges from 6.15 – 6.18m, with the exception of LG.01. Officers consider the outlook from the main living areas of these units would be very poor, and would create a clear sense of enclosure. Furthermore, the rear gardens would be significantly enclosed and sunken spaces, therefore not creating a positive environment for the amenity of future users. Officers consider the quality of living provided for the duplex units proposed is not acceptable, and this amounts to a reason for refusal, against the requirement of Policy H5 of the Core Strategy (2014).

14.22 It is considered that the units on the upper floors provide an acceptable standard of accommodation, and due to the orientation of the units and spatial buffers from neighbouring properties there would be acceptable levels of privacy overall within the development.

15 Impact on the amenity of adjoining residential properties

15.1 Policy 7.6 'Architecture' of the London Plan 2016 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing etc. Policy DH(b) 'Protection of Amenity for Adjacent Occupiers' of the Core Strategy 2014 states that new development will only be permitted where it can be demonstrated that the proposal does not cause an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight or privacy they enjoy or result in an un-neighbourly sense of enclosure.

15.2 The site has a number of different residential properties that look onto it from different directions and distances. A review of the residential amenity impacts for each are undertaken below. This includes the outcomes of the Daylight and Sunlight Assessment undertaken by T16 Design (March 2020).

4-5 Hillreach (Rear)

15.3 No.4 Hillreach is located immediately to the west of the application site. Although appearing to be unoccupied, there are residential dwellings above the Village Blacksmith pub. This sits adjacent to the existing house on the application site. The proposed development extends the same distance beyond the main rear wall of the neighbouring property than the existing house on the site (approx. 5.6m). It is also confirmed the nearest window to the proposed development is a stairwell, therefore there is a spatial buffer from the nearest habitable room. There are no windows proposed on the western elevation. A terrace is located on the third level that can overlook the property, therefore officers consider a privacy screen for this balcony should be conditioned. There are balconies that face onto 4-5 Hillreach but the main building obscures any overlooking onto the main building of the neighbouring property, and the ground floor at the rear mainly consists of a rear extension to the pub.

15.4 The Daylight / Sunlight Assessment undertaken confirms the three windows nearest the site retain 80% of the existing VSC daylight levels as result of the proposed development. The windows were not assessed on sunlight levels as these are not 90 degrees of due south.

15.5 On balance officers consider the proposed development along the western boundary does not adversely impact the residential amenity of the upper floors of 4-5 Hillreach beyond what currently exists with regards to daylight / sunlight, privacy, overbearing development, and sense of enclosure.

6-7 Hillreach (Rear)

15.6 As 6-7 Hillreach is further away from the site, and a spatial buffer is created by 4-5 Hillreach, officers consider the residential amenity impacts would be less than the nearer neighbouring property and therefore do not consider there to be any unacceptable amenity impacts on the occupants of 6-7 Hillreach.

1 – 5 Ogilby Street

- 15.7 The rear facades and gardens of these neighbouring properties directly face the rear of the proposed development to the north. The rear boundary of these properties, adjoining the proposed development is a brick wall that ranges from 4.1m to 4.8m due to level changes. The proposed rear projection steps away from this boundary at ground floor level, and first and second floor level, with the main rear elevation roughly a minimum of 18m from the rear façade of these neighbouring properties.
- 15.8 These neighbouring properties have been assessed with regards to daylight and sunlight, with all but one rear window retaining 80% of VSC. The assessment of these windows was based on details of the planning permission for these properties. The single window on the ground floor that has a retained value of 76% (minor breach), has been blocked off by a single storey rear extension. The APSH and WPSH levels for sunlight confirm that these windows either retain 80% of the existing value or have in excess of 25% annual or 5% of winter sunlight as a result of the proposed development.
- 15.9 The Housing SPG (2016) recommends an 18 -21m separation distance to protect privacy levels of adjoining neighbours. The main façade of the rear elevation is set 18m from the rear façade of the neighbouring properties, with all units within the rear projection facing west or east, with high level windows. Furthermore the Kings Arms approval (17/2771/F) will also have an element of overlooking onto this neighbouring property. Therefore it is considered that the resultant privacy levels of these neighbouring properties is acceptable.
- 15.10 The proposed development will have a significant visual impact on these neighbouring properties that are parallel and face directly opposite the proposed development. The existing property is approximately the same level as the lower ground floor of the proposed development. This height configuration means the proposed development is six-storeys in height relative to the level of these neighbouring properties with an 18m distance. The first and second storey rear projection also adds further additional bulk that would be clearly apparent from the rear gardens. Included within this spatial buffer from the proposed development is the full length of the rear gardens of 1-5 Ogilby Street. Officers consider the height and scale of the proposed development, together with the proximity to these neighbouring properties would be detrimental to the amenity

of the existing occupants by reason of an overbearing development that would create an unacceptable outlook from the rear of these properties, and a significant sense of enclosure. This amounts to a reason for refusal.

1-13 Frances Street

- 15.11 These properties are located to the north-east of the proposed development, the rear elevations face on to the application site at a slight angle. These properties are roughly a minimum of 19m from the building of the proposed development.
- 15.12 The daylight and sunlight assessment confirms the impacts of the proposed development would be all within the acceptable standards of the BRE guidance.
- 15.13 Due to the distance and orientation to the proposed development, officers consider there would be no adverse impact on the amenity of these neighbouring properties with regards to daylight and sunlight, a sense of enclosure, on privacy levels, or on outlook.

Granby House (Ogilby Street)

- 15.14 Granby House is to the north-west of the proposed development and does not face onto the proposed development. At the nearest point the application site is approx. 23m from the proposed development, and due to its orientation the rest of this neighbouring property then becomes further away.
- 15.15 The daylight and sunlight assessment of the 22 windows of Granby House that face onto the site confirms the impacts of the proposed development would be all within the acceptable standards of the BRE guidance.
- 15.16 Officers consider due to the orientation of this neighbouring property and the spatial buffer to the application site it is considered there would be no adverse amenity impacts as a result of the proposed development.

Kings Arms, 1 Frances Street – Approval (17/2771/F)

- 15.17 The adjoining Kings Arms site to the east has an extant permission which is a material consideration for this application. The proposed development projects 2.9m further in depth than the Kings Arms permission, the height of this additional projection would be three storeys.
- 15.18 Following a request by officers a daylight and sunlight assessment has been undertaken based on the approved units of the Kings Arms permission. The conclusion of this assessment is that all windows that could be affected by the proposed development retain acceptable levels (+80%) as described by the BRE requirements.

15.19 The proposed second floor rear unit 2.02 that includes a balcony facing east onto the approved Kings Arms site will overlook an element of the communal garden on the first floor of the neighbouring scheme. However officers consider this scenario will already be created by the rear upper floors of 3 Frances Street. Therefore the proposals would not amount to adverse impact on privacy of this development.

15.20 It is noted by officers that the proposed development extends 2.9m further than the approved Kings Arms approval. At the first floor level is a private terrace servicing a unit .7m from the adjoining boundary, with bedroom windows located on the higher floors. Officers consider this projection at the adjoining boundary would create an overbearing scenario and a sense of enclosure within the neighbouring mid-floor units adjoining the proposed development that are north facing.

Greenhill Terrace (Former Garrison School)

15.21 It is noted during the consultation period a number of objections have been received from neighbours within this property with regards to overlooking, outlook, and daylight and sunlight. It is considered as this neighbouring property is due south of the proposed development there would be no impact on daylight and sunlight levels. Furthermore the 23m spatial buffer from the neighbouring property to the proposed development is an adequate distance to offset any concerns of outlook or overlooking on the existing residents.

Summary

15.22 It is considered that the proposed development would adversely impact on the amenity of 1-5 Ogilby Street and the approved scheme at the adjoining Kings Arms site due to an overbearing development and forming a sense of enclosure due to its scale, height, and depth. This forms a reason for refusal.

16 Transport and Access

16.1 London Plan Policy 6.13 requires the maximum parking standards in table 6.2. Developments supported by a high level of public transport accessibility and within Controlled Parking Zones (CPZ) should be car free. This is supported by Core Strategy Policy IM(c).

16.2 Hillreach is a busy classified road (B210) and bus route subject to loading / waiting restrictions outside the premises which operate Monday to Friday between the hours of 7-10am, and 4-7pm. The site is accessible to 6 bus routes within walking distance and is approximately 640m to Woolwich Dockyard Station, (approximately 8 min walk). The site therefore has good access to public transport, where the site has a PTAL of 4 on a scale of 1 – 6 where 6 is excellent.

- 16.3 The site is not located within a Controlled Parking Zone (CPZ) and several roads locally are unrestricted. As off-street parking provision is limited there is high demand for parking on-street. Greenwich Council has set their parking standards policy based on the London Plan. Policy IM(c) sets Greenwich policy that in high PTAL zones and CPZ areas developments should be car free.
- 16.4 The vehicle access to the site is currently from two points on Hillreach but these will be removed for the development. Both vehicular accesses are to be abandoned, and the footway is to be reinstated, this is to be at the developer's expense (by condition). This footway location is historically narrow creating a pinch point, therefore the opportunity of widening the footpath to improve pedestrian movement in this location is welcomed, and is as wide as the footpath within the Kings Arms permission (17/2771/F).

Car Parking

- 16.5 The proposed development will not provide any parking spaces on-site, therefore the roads surrounding the site would be expected to provide parking capacity for future occupants. Census data for the Woolwich Riverside ward (within which the site is located), indicates car ownership is around 40% per household. However approximately 10% of households have 2 or more cars and therefore car ownership is assumed to average 50%. It is therefore suggested there could be a parking demand for approximately 10 cars on street.
- 16.6 As part of the application, a revised Transport Statement has been submitted detailing the potential impact of the development. Parking surveys have concluded the roads in the area suffer high levels of parking stress, and demand from this proposed development could exacerbate existing problems for residents and visitors. As overall it has only been demonstrated that there is availability to park on-street when the restrictions do not apply (58 spaces) and that generally there will be less space available to park on-street than indicated, this will therefore increase local stress. However, as there is evidence of some on-street capacity with 58 spaces available on restricted roads when waiting times expire and a few spaces available on unrestricted roads close to the site, overall no objection is raised.
- 16.7 It is indicated 2 accessible flats would be provided within the development, it is accepted that not all may require car park spaces. Under the Intend to Publish London Plan (2019), Policy 6.A.4 relating to residential parking standards states that "Adequate parking spaces for disabled people must be provided preferably on-site". The draft London Plan recommends that initially parking for 3% of the total units proposed should be provided from the outset, although it should be

indicated where a further 7% could be accommodated if demand requires it. During the determination period, the applicant has confirmed with highways that one on-street parking space proposed on Frances Street would be acceptable. This blue badge space is identified indicatively in Appendix E of the submitted Transport Statement (Rev C), this is approx. 65m from the site. This will allow the future occupants of the wheelchair units to use this space, and also provide a blue badge space for wider public use. It has been agreed by the highways officer and Transport for London that the implementation of the blue badge space would be based on a specific demand rather than providing this initially, and the provisional contribution for this will be secured by a legal agreement.

Cycle Parking

- 16.8 The quantitative requirements for cycle parking confirmed within the Intend to Publish Draft London Plan, specifically Table 10.2 of Policy T5 confirms, for a residential use, residents (long-stay) 1 space per 1 person 1 bedroom is required, 1.5 spaces per 2 person 1 bedroom dwelling, and 2 spaces per all other dwellings. This equates to a requirement of 38 spaces for the proposed development. Furthermore, a cycle provision for visitors (short-stay) to the development of 2 spaces for a development that amount to 5 to 40 units is required. The proposed development includes 40 cycle spaces on the lower ground floor, 4 external but covered visitor spaces at ground floor level in close proximity to the entrance, and a cycle store within each of the employment units. This provision is considered acceptable.
- 16.9 The Council's preference is for Sheffield stands rather than vertical or stacked cycle racks, in order to enable use by all age ranges and to accommodate different types of cycles. Transport for London provides Cycle Design standards indicating the design of secure cycle parking including the width of stores to ensure that they are functional and easy to use. They require a minimum aisle width of 2.5m between the end of the cycle stand and the wall. Whilst 28 of the long term spaces located on the lower ground floor are in a two-tier rack configuration, the corridor between the spaces either side, is 3.2m, is considered an acceptable distance. The sheffield stands proposed also show adequate spacing.
- 16.10 TfL have raised an issue with the proposal only providing one lift, as if this lift breaks down there would be no access to the cycles. Whilst the scenario TfL refer to would create problems, the London Cycle Design Standards (2016) make no reference to this requirement. Section 8.2.1 (Cycle Parking for All) requires that lifts or shallow gradient ramps should be provided to any basement cycle parking, and provides required dimensions, which the proposal is compliant with. As there is no relevant policy that requires this, officers consider the maintenance of the lift is not a planning issue, and falls within the management of an operational

building. The proposed lift details are considered acceptable in the context of the cycle parking requirements.

16.11 A contribution towards cycle training should be secured through the s106 agreement.

Proposed Transport Conditions and Legal Agreement

16.12 In order to promote sustainable travel for future residents a Travel Plan should be secured accordingly if planning permission is given. The travel plan includes measures, targets, and monitoring that should promote sustainable transport. Personalised journey planning could also be considered to influence positive journey patterns from the start.

16.13 The nearest Car Club vehicle is located close to Woolwich Dockyard Station. Given the limited amount of parking, but recognising that car use may still be required on an ad-hoc basis, it is recommended that in order to support the viability of the Car Club that such a facility be available to all residents. If permission is granted this should be conditional to contributing to join the existing car club. In line with SPD requirement the first 5 years Car Club resident membership should be paid by the developer to encourage its use and be secured by agreement.

16.14 The footways around the site are in a poor condition and it is recommended that the footways surrounding the site are re-laid or improved in line with the Healthy Streets approach. Furthermore, works are to be undertaken to abandon the existing vehicle access. The works would be carried out at developer's expense and therefore all highway works should be secured by s278 agreement as part of a section 106 agreement, subject to planning permission being given.

16.15 Delivery vehicles servicing the premises are required to be carried out from the road between the hours of 9.30am to 4.30pm due to loading restrictions along Hillreach. A related condition should be attached to any permission given.

16.16 Construction traffic is discussed within the submitted details, therefore an appropriate planning condition controlling construction traffic is sought. This should include a well enforced booking system to help reduce the likelihood of queuing on the highway at peak construction times. The construction routes also need to be agreed.

17.0 Sustainability and Energy

- 17.1 The National Planning Policy Framework (2019) sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The NPPF also notes that planning supports the delivery of renewable and low carbon energy and associated infrastructure.
- 17.2 The London Plan (2016) policy 5.1 seeks an overall reduction in carbon dioxide emissions whilst policy 5.2 states that major development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following hierarchy:
1. Be lean: use less energy;
 2. Be clean: supply energy efficiently; and
 3. Be green: use renewable energy.
- 17.3 Policy 5.2 sets targets for carbon dioxide emissions reduction in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The target for residential buildings is zero carbon from 2016 and non-domestic buildings from 2019, prior to which the target is as per building regulations (35%).
- 17.4 London Plan Policy (2016) 5.7 states that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-site renewable energy generation wherever feasible.
- 17.5 Policy E1 of the Core Strategy (2014) states that Carbon Emissions will be reduced in accordance with the Mayor's energy hierarchy.
- 17.6 The applicant has demonstrated in their Energy Strategy (Rev A, November 2018) that the residential component of the development will reduce the regulated CO₂ emissions by 62.3%, equivalent to 16.08 tonnes per year, and the non-residential component by 43.96%, equivalent to 1.2 tonnes per year, beyond Building Regulations (BRs) Part L 2013 Baseline.
- 17.7 A site wide CO₂ emissions reduction (regulated) of 60.6%, equivalent to 17.28 tonnes per year, is predicted beyond BRs Part L 2013 Baseline. The proposal would use measures in accordance with the Mayor's Energy Hierarchy to achieve the Carbon savings set out below.

Be Lean

- 17.8 A range of passive and active energy efficiency measures are to be employed within the development including improved fabric specification and air

permeability, energy efficient lighting and heating system, heating controls, natural ventilation and mechanical extract to kitchens and bathrooms in the dwellings, which predict a reduction in regulated CO₂ emissions of 22%, equivalent to 5.78 tonnes per year, for the residential component and 33%, equivalent to 0.9 tonnes per year, for the non-residential component, beyond the BRs Part L 2013 Baseline.

17.9 Whilst SAP modelling reports were provided to address some of Sustainability's concerns, there are a number of clarifications as well as improvements that need to be investigated under this stage of the Energy Hierarchy by the applicant as follows:

- a) Demonstration of the thermal bridging calculations and provision of SAP Thermal Bridge modelling reports;
- b) Window's g value must be improved beyond the default value by BRs Part L;
- c) Clarification is required why the efficiency of the gas boiler proposed to be used within the proposed scheme is less than the one proposed under the baseline;
- d) Demonstration how the Area Weighted Average for DER and TER has been calculated;
- e) Clarification how the reduction in the unregulated carbon emissions for the commercial has been achieved as shown under Section 6.4 of the Sustainability Statement Rev A;
- f) Provision of BRUKL modelling output reports for the non-residential component separately for each stage of the Energy Hierarchy;
- g) There seems to be an inconsistency between the U Values submitted within the Stage 1 and Stage 2 SAP modelling output reports submitted together with the applicant's response and clarification is required.

Be Clean

17.10 An investigation has taken place to identify if any local district energy networks are available. In accordance with the revised report (Rev A, November 2018), there are no current connection opportunities for the proposed development. In response to the Sustainability's requirement for how the development will be future proofed to allow connection to an offsite heat network, the revised report states that a communal heating system will enable the scheme to become part of a future district heating scheme.

17.11 Appropriate provisions will therefore be made to ensure that when a district heating system becomes available in the area a connection could be made to the building. The revised report also recognises that the location of the development is within an area of high density and estimated high heat demands within the locality.

- 17.12 It should be noted that the proposed development is close to Woolwich town centre where an energy masterplan to investigate options for the delivery of a heat network is currently being carried out by the Council. For this reason further details are required of the method for how the development will facilitate connection to an offsite heat network are required including technical details of the communal system, layouts of the plant room showing the specified equipment and space allocated for the future equipment etc.
- 17.13 In addition, it should be noted that individual gas boilers are not supported by the Council due to their incompatibility with connecting to an offsite heat network and the Council's Climate Emergency Plans to become zero carbon by 2030.
- 17.14 The applicant has not addressed Sustainability's comment relating to consideration for how the development will be future-proofed to achieve zero carbon emissions on-site by 2030. A hybrid communal heating system in the form of Air Source Heat Pumps and gas boilers can be investigated.
- 17.15 It is also noted that the proposed scheme is next to another proposed scheme, the Kings Arms Public House which relates to the construction of residential units on top of the Public House and therefore the applicant shall investigate a single plant room serving the two schemes for the provision of space heating and hot water. Evidence of investigation and correspondence with the applicant for the King's Arms Public House should be provided.

Be Green

- 17.16 Several renewable technologies have been investigated in terms of technical, physical and financial feasibility, as potential renewable systems for use on the project. Following Sustainability's comments, the applicant has maximised the contribution from the solar PV. Whilst this is welcomed, technical details of the solar PV system shall be provided as the information included within the Sustainability Report Rev A does not correlate with the number of PV panels shown in the roof plans submitted with the applicant's responses.
- 17.17 Details of any renewable system proposed for the non-residential component are required to be provided.

Carbon Offset

- 17.18 In order to comply with the zero carbon requirements of The London Plan (2016) and Core Strategy, an offset payment of £60/tonne over a 30-year lifecycle will be required for the remaining emissions of the development on the residential component and potentially on the non-residential component of the proposed scheme. This requirement would be secured through a s106 legal

agreement if permission is given, and the applicant is required to include an offset payment in the revised energy strategy.

Overheating

17.19 A number of passive design measures have been considered to reduce the risk of overheating as stated under the Be Lean stage above. Appendix I of revised report (Rev A, November 2018), demonstrates that all habitable spaces within the residential component pass CIBSE's TM59 and TM49 criteria. The energy demand reduction measures proposed will ensure that the overheating risk has been minimised.

Renewable / Low Carbon Energy Performance Monitoring

17.20 Compliance with London Plan (2016) Policy 5.7 (Renewable Energy) and RBG Core Strategy policy EI (Carbon Emissions) should be demonstrated through a monitoring agreement that will be signed between the Local Authority and the applicant to monitor the effectiveness of the renewable energy technology if the planning application is approved. The agreement has to be signed prior to first occupation to comply with the prevailing monitoring requirements which will include the installation of an on-site automatic meter reading (AMR) device and provision of monitoring data to the Council's Sustainability Team for a minimum period of 5 years.

Water

17.21 The Water efficiency target for the residential component has been updated which is welcomed. A BREEAM Excellent standard for the 'Wat 01' BREEAM water category for the non-residential component shall be also achieved. The above water requirements would need to be conditioned if planning permission is approved.

Summary

17.22 Overall, the proposals are generally considered to comply with the minimum relevant London Plan CO₂ emissions reduction target of 35%. However, the residential component does not meet the zero carbon standard and there are still outstanding issues that prohibit the Council's Sustainability officer from considering the scheme as acceptable in energy terms. As stated above, there are a number of areas of improvement and measures that the applicant should consider and a number of conditions and S106 Head of Terms would be required to ascertain that the applicant will commit to investigate them before and during the construction of the development if planning permission is given. Any carbon shortfall would need to be addressed through a carbon offsetting contribution which will be paid to the Council's Carbon Offsetting Fund.

Ecology

- 17.23 Policy 7.19 of the London Plan (2016) and policy OS4 of the Core Strategy (2010) seek wherever possible to ensure that development makes a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 17.24 Policy 5.10 of the London Plan requires development to 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.
- 17.25 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.
- 17.26 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.
- 17.27 An ecological survey has been conducted on site by a qualified ecologist. Ecological survey results confirm that that site does not have significant ecological constraints. A number of enhancements are proposed by the ecologist.
- 17.28 Sustainability welcome that Phase I habitat survey has been undertaken. The development site is located in an urban environment and the existing use of the site does not lend to it having ecological value. Sustainability recommend that measures proposed by the ecologist are implemented to enhance biodiversity. Measures include installation of Habitat Boxes and a minimum of 3 Schwegler type IFR bat tubes in the new building.
- 17.29 Drawings also include the proposed green roof; however, no details of design of the green roof have been submitted. The green roof will need to be compliant with GRO Green Roof Code 2014 and comply with London Plan policies 5.11 (Green Roofs and Development Site Environs) and 7.19 (Biodiversity and Access to Nature) and Core Strategy policies OS4 (Biodiversity), DHI (Design) and E(f) Living Roofs and Walls.
- 17.30 Following Sustainability's comments, the applicant has proposed a biosolar roof which is supported. However, additional information is required on the roof proposed through condition

17.31 Therefore officers consider the details related to ecology to be acceptable, and if planning permission is obtained this will be subject to relevant conditions relating to an ecological management plan, and extensive green roofs.

18 Noise, Air Pollution, and Land Contamination

18.1 London Plan policies 5.21, 7.14 and 7.15 seek to manage potential impacts concerning contaminated land, air quality, and noise emissions (affecting both proposed occupants of the development and adjoining occupiers).

Noise/Disturbance

18.2 Paragraph 109 of the NPPF requires that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

18.3 Policy 7.15 of the London Plan 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.

18.4 Policy E(a) states that housing or other sensitive uses will not normally be permitted on sites adjacent to existing problem uses, unless ameliorating measures can reasonably be taken.

18.5 Policy H5 Housing Design of the Core Strategy states that new residential development will be expected to achieve a high quality of housing design and an integrated environment. The Royal Borough will take into account the key relationships between the character of the area, site location and housing densities and expect the following:

iii) An acceptable level of noise insulation being achieved by means of sensitive design, layout and in development vulnerable to transportation noise and vibration.

18.6 The application includes a Noise Impact Assessment (October 2017), the Council's pollution officer has reviewed the details, and has confirmed internal levels can be achieved with the mitigation incorporated in the design. Therefore standard conditions associated with sound attenuation (for internal noise levels), commercial/residential internal sound insulation, noise from fixed plant &

equipment, and demolition/construction condition & Construction Plant and Machinery (NRMM) should be attached to any permission given.

18.7 As such, subject to the requirements of the proposed condition being discharged, it is considered that good internal ambient noise levels will be achievable in the development. The application is considered to satisfy Policy H5 of the Core Strategy (2014).

Air Quality

18.8 Policy 7.14 of the London Plan states that developments should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, and that they should also reduce emissions during demolition and construction phases.

18.9 Policy E(c) of the Core Strategy (2014) states that residential development within areas that are currently exposed to air quality concentrations above the National Air Quality Strategy (NAQS) Objectives for Particulate Matter (PM10) and Nitrogen Dioxide (NO2) should take into account the need to reduce exposure by the following design mitigation hierarchy:

- i. Separation by distance;
- ii. External layout
- iii. Internal layout; and
- iv. Suitable ventilation.

18.10 The application includes an Air Quality Assessment (November 2018), the Council's pollution officer has reviewed the details, and considers the air quality levels for future residents acceptable. Whilst mitigation measures have been set out in relation to mitigating environmental impacts during the construction phase within the submitted details, the pollution officer has requested a Construction Management Plan condition is attached to any permission given.

Land Contamination

18.11 The submitted Phase I Contaminated Land Assessment – Revision B (May 2017) has been reviewed by the environmental health officer and the recommendations of the assessment are agreed to, and given the history of the site, the potential contamination issues, and proposed use, a land condition needs to be added to any permission to ensure the recommendations are adhered to.

19 Flood Risk

- 19.1 Policy E2 of the Core Strategy states that new developments should apply the sequential and exceptions tests as detailed in the NPPF and the Council's Strategic Risk Assessment be used to inform development and reduce flood risk in the Borough.
- 19.2 Policy E3 states that within those areas protected by flood defences but with a high residual risk classification developments should implement risk reduction measures with the primary aim of reducing risk to life.
- 19.3 In terms of Flood Risk, the site lies within Flood Zone 1 and therefore benefits from a minimal risk from flooding. This is confirmed within the submitted design and access statement.
- 19.4 The submitted application includes a Drainage Statement (February 2019), not all details have been provided to fully satisfy the policy requirements and technical standards. The local flood risk manager has not raised objection to the details but has requested conditions relating to the detailed design of the surface water drainage and associated measures, to ensure the proposal will not increase flood risk.

20 Refuse Provision

- 20.1 London Plan Policy 5.16 requires London Boroughs to minimise waste and encourage recycling.
- 20.2 Core Strategy Policy H5 states that new residential developments should include adequate provision for waste recycling and Policy DHI states that all developments should demonstrate on-site waste management including evidence of waste reduction, use of recycled materials and dedicated recyclable waste storage space.
- 20.3 London Plan Policy 5.16 requires London Boroughs to minimise waste and encourage recycling.
- 20.4 Core Strategy Policy H5 states that new residential developments should include adequate provision for waste recycling and Policy DHI states that all developments should demonstrate on-site waste management including evidence of waste reduction, use of recycled materials and dedicated recyclable waste storage space.
- 20.5 Comments from waste services confirmed the provision and layout of waste provision follows the 'New Developments: Guidance Notes for the storage and

collection of waste and recycling materials' guidance. A minor clarification was required regarding a new drop kerb location for the collection of waste as the existing drop kerbs will be abandoned. Additional details were subsequently submitted which has overcome concerns raised.

20.6 As such officers consider the proposal complies with Policy 5.16 of the London Plan (2016), Policies H5 and DHI of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (adopted 30th July 2014) and the Council's Waste Guidance Note (2014).

21 Safety and Security

21.1 Policy 7.3 of the London Plan (2016) seeks to ensure that developments are designed to reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

21.2 Policy DHI of the Core Strategy (2014) states that all developments are expected to demonstrate how they contribute to a safe and secure environment for users and the public. Policy CHI goes on to state that all developments must include measures that help to create and maintain cohesive communities.

21.3 The proposal has been assessed by the Metropolitan Police Designing Out Crime Officer. The Officer did not object to the scheme provided that the development is required to meet the Secured by Design certification, and to ensure that suitable security measures are in place prior to occupation of the development. This should be secured by condition if officers are minded to approve the application.

21.4 The design out crime officer did raise an issue with regards to the proximity of the fence surrounding the lightwells, and the first floor balconies. The fence and lightwells have been removed as part of the amendments, therefore this concern is no longer relevant.

21.5 Subject to the condition referred to, it is considered that the proposed development would reduce opportunities for criminal behaviour and contribute to a sense of security generally, in accordance with Policy 7.3 of the London Plan (2016) and Policy DHI and CHI of the Council's Core Strategy (2014).

22 Community Infrastructure Levy (CIL)

22.1 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 2015, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL2 will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £25 per square metre.

22.1 The current application is liable to this requirement.

23 RBG CIL

23.1 The Royal Borough adopted its Local Community Infrastructure Levy (CIL) charging schedule, infrastructure (Regulation 123) list, instalments policy and exceptional circumstances relief policy on the 25th March 2015 and came into effect in Royal Greenwich on the 6th April 2015.

23.2 The current application is liable to this requirement.

24 Legal Agreement

24.1 Notwithstanding the recommendation to refuse the application, if the scheme were to be approved, the development of the site would require a Planning Legal Agreement. The applicant has not entered into a Planning Legal Agreement and this is considered to be a reason for refusal. Without prejudice to any decision the Council may make to refuse the application, the following Heads of Terms would need to be secured in a Planning Legal Agreement to capture any obligations and mitigation proposed to ensure that the scheme is policy compliant and delivers the proposal put forth in the application:

Affordable Housing

- Secure three on-site affordable units, two at London Affordable Rent, and one Intermediate unit.
- Early review mechanism to ensure that the scheme delivers the maximum amount of affordable housing and maximum S106 contributions required to achieve a policy compliant scheme if not substantially commenced within two years.
- A late stage review mechanism at the point at which 75 per cent of units are sold or let to ensure a financial contribution for additional affordable housing provision in the event that viability has improved since the application stage.

Transport

- Financial contribution towards car club spaces and payment of membership for residents of the development for the first five years;

- Financial contribution for the provision of 1 blue badge on-street parking space.

Employment and Training

- Financial contribution towards commitment and participation towards GLLaB and business support including contribution in line with Planning Obligations SPD.
- Requirements for detailed fit-out and marketing of the BI(c) units.

Environmental Sustainability

- A carbon off-setting payment in order to mitigate against the shortfall in on-site CO² reduction.

S278 Agreement

- Works to re-lay and improve the footways surrounding the site in line with the Healthy Streets Approach, and to abandon the existing vehicle access.

Other Obligations

- Payment of legal costs;
- Payment of S106 monitoring costs.

25 Implications for Disadvantaged Groups

25.1 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:

- The scheme would provide 3 units of affordable housing, with a 66%/33% London Affordable Rent / Intermediate.
- 10% of the new housing will be designed as wheelchair standard housing;
- A financial contribution and commitment to GLLaB; and
- The proposal will provide new job opportunities in the construction phase of the development
- Slight increase in employment on the site through the BI(c) use, 1 FTE position

26 Conclusion

26.1 It considered that the development as proposed does not comply with national, regional and local policy as per the reasons for refusal set out in 1.1 of this report.

26.2 Accordingly, it is recommended that planning permission be refused for application reference 18/4454/F, in line with Section 1 of this report.

Background Papers

National Planning Policy Framework (2019)
Planning Practice Guidance
The London Plan (2016)
Mayor's Housing SPG (2016)
London Plan Affordable Housing and Viability SPG
(2017)
Royal Greenwich Local Plan: Core Strategy with
Detailed Policies (Adopted July 2014)

Report Author:

Tom Blackman (Principal Planning Officer)

Tel No:

020 8921 2409

Email:

Tom.Blackman@royalgreenwich.gov.uk

Reporting to:

Victoria Geoghegan

Assistant Director Planning & Building Control

Tel No:

020 8921 5704

Email:

Victoria.Geoghegan@royalgreenwich.gov.uk