

PLANNING BOARD 7 January 2020	Agenda Item: 5 Reference No: I8/4530/F
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Applicant: The Edition Group
Agent: Savills

Site Address: Ravensbourne Wharf, Norman Road, Greenwich, SE10 9QF	Ward: Greenwich West Application Type: Full Planning Permission
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ADDENDUM

I.0 Planning Board report clarifications:

- I.1 It is acknowledged that the manual calculation of the PTAL rating undertaken by the applicant is PTAL 5, which would be “very good” accessibility.
- I.2 It should be clarified that all reference to Creekside Village East within the design section 17.0 relate to Essential Living.
- I.3 Para 4.3 – This should refer to Union Wharf which is completed.
- I.4 Para 12.2 – Confirmation that there are only duplex Three Bed Five Person Flats
- I.5 Para 12.7 - “... with regard to the ADF the results outline that 3 of the 23 living rooms tested would not comply with the relevant VSC BRE standard for sunlight to windows”.
- I.6 Para 12.13 and 21.12 – It can be clarified that the acoustic assessment states that of the “144 external private balconies 12 are predicted in the worst-case, to have noise levels around 64-65 dB LAeq,T”.
- I.7 Para 20.3 - It is noted that Greenwich Quay and Creekside East are to the West of the Site and the properties identified as being at Thornham Street, Haddo House and Claremont Street are to the East of the site, except 33-43 Thornham Street which is correctly identified as to the South.
- I.8 Para 22.3 – References to all two bed units should be 2B4P instead of 2B3P

2.0 Update to Heritage Sections of Planning Board report

2.1 Following the issuing of the planning board report a clarified heritage assessment has been undertaken in reference to sections 18.0 and 19.0 of the Planning Board Report. The clarification has sought to clearly identify which heritage assets are considered to have “less than substantial harm” as a result of this scheme.

Impact on the St Paul’s Conservation Area (SPCA), West Greenwich Conservation Area (WGCA) and Deptford Creekside Conservation Area (DCCA), World Heritage Site Buffer Zone (WHSBZ) and World Heritage Site (WHS).

Conservation Area

2.2 The site is not located within a conservation area, however the proposal site is within close proximity to a number of conservation areas and they are considered in turn below.

- A) St Paul’s Conservation Area (London Borough of Lewisham)
- B) West Greenwich Conservation Area (Royal Borough of Greenwich)
- C) Deptford Creekside Conservation Area (London Borough of Lewisham)

2.3 With respect to the St Paul’s Conservation Area, the applicant has provided a verified view from within the conservation area at 16, 21, 33, 34 and 35 to demonstrate the impact of the proposal from the conservation area and on the setting of St Paul’s Deptford. The verified views demonstrate how the significant separation distance, the divisibility between the heritage assets and the overall emerging context would ensure the asset is not undermined. In particular from the grounds of Grade I listed St Paul’s Deptford in views from the far west end of the churchyard by Deptford High Street it is noted that the proposed development appears well screened by trees in these views. As such, it is considered that the proposal will preserve the significance of St Paul’s Conservation Area.

2.4 As referred to in the tall building assessment, the building form and articulation have been designed to relate sympathetically to the local context. It is considered that proposal would conserve the significance of the West Greenwich Conservation Area. The applicant has provided verified views from within the conservation area, including 10 (Roan Street), 11 (St Alfege’s Church) and 13 (The Hill Restaurant). The HTVIA clearly outlines that the proposal would have a marginal increase in visual impact over the existing

situation, with part of the upper portion of the building being visible and would consolidate as a cluster of tall buildings within this tall building designation. This view is shared by Council officers, and it is considered that the distant views and separation distance would ensure that the character and appearance of the West Greenwich Conservation Area will be preserved.

- 2.5 In terms of Deptford Creekside Conservation Area, while parts of the development would be visible the proposal would remain to be seen collectively with the surrounding buildings in this environment. In particular, it is concluded in the HTVIA that “... *the application proposals will not impact the special interest of Deptford Creekside Conservation Area*”. The report has assessed the proposals impact on the aforementioned Conservation Area and its surrounds. Having considered whether the proposal causes any harm to this heritage asset, officers concur with the conclusion and consider that the proposed development will not detrimentally impact on the Deptford Creekside Conservation Area.

Maritime Greenwich World Heritage Site

- 2.6 Views 1 and 2 are discussed above in the tall building assessment. View 7 from the Royal Naval College (College Way) is recognised as of high value. Given this, and subsequent to Historic England’s, Maritime Greenwich World Heritage Site and RBG Conservation Officer’s initial comments further kinetic testing was undertaken (views 23-32). The kinetic testing was required, as it was clear that the overall appreciation and value of this site is not from one static viewpoint location but the overall experience.
- 2.7 The kinetic view is essential at establishing whether any harm is caused from the proposed building to the east west axis. The east-west view along College Way to the Town Centre is one of the key views outwards from the Old Royal Naval College. In particular, the WHS Management Plan identifies this axis along College Way as an Important Local View. Therefore, following initial consultation with Historic England further detailed assessment was undertaken to the west along College Way where the Grade I listed Royal Naval College Gates and Gate Piers and high street buildings behind come into view.
- 2.8 The HTVIA outlines that for the most part; there would be glimpses of the building from views 26 – 29 with the building hidden by existing built form at the other viewpoints. In particular, view 27 where the development would be seen in context with the Essential Living scheme which is of the exact same height. From views 28 – 32 which is a kinetic view towards the High Street, the building would be visible as the viewer approaches the edge of the World Heritage Site. Concern was raised by Historic England regarding the harm of the building in isolation, and in combination with other emerging schemes in

Deptford Creek. Particular concern was raised regarding harm from the development appearing over the roofline of the Grade II Pepys Building.

- 2.9 The additional information provided by the applicant with the kinetic view of College Way outlines that the proposals will not affect the ability to appreciate the Outstanding Universal Value of the Maritime Greenwich World Heritage Site. The focus will remain the buildings and development in the foreground with the proposed building seen from limited vantage points and at a substantial distance from the WHS.
- 2.10 The WHS, and its overall significance as a designated heritage asset, would remain predominantly intact. While there would be some harm caused to the setting of the Pepys Building as discussed below. The fabric of the Pepys Building itself, would remain completely untouched.
- 2.11 The HTVIA concludes “... *that the application proposals will not affect the ability to appreciate the Outstanding Universal Value of the Maritime Greenwich World Heritage Site. It is important to note that effects on heritage assets are not just limited to visual considerations and it is important to understand the experiential element of the setting as well. In all of the views, the application proposals will be visible to a different degree, albeit that they will be seen as a backdrop element which the viewer will be able to appreciate the different planes on which the buildings sit. As a result, foreground elements will remain as the visually dominant element*”.
- 2.12 In addition to the external views, the applicant has provided additional viewpoints from within the World Heritage Site including from rooms within the Royal Naval College itself and are noted as views 39 – 40. In terms of these views the application proposals would be largely obscured by interposing mature trees which screen the surrounding built environment. It is also acknowledging that the trees are deciduous and that when not in leaf the development would not be detrimental to significance. Therefore, the proposal is not considered to undermine these views.
- 2.13 Notwithstanding the above, Council’s conservation officer considers that the height of the proposed development would have an impact on the WHS. This view is shared by Historic England who consider that the proposals would cause some harm to the Outstanding Universal Value of the Maritime Greenwich World Heritage Site. In summary it is considered that the development as seen from College Way toward St Mary’s gate would result in some harm to the World Heritage Site. For the purposes of the NPPF this harm is considered to constitute less than substantial harm to the World Heritage Site.

2.14 The planning application lies in an area of archaeological interest. The planning application was consulted with GLAAS who raised no objections subject to an archaeological condition that requires a two-stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

Impact on nearby Listed Buildings

2.15 The following listed buildings are considered to be the most affected by the proposal:

- Church of St. Paul
- Pepys Building

Church of St. Paul (Grade I)

2.16 The Church of St. Paul is located to the west of the site and is located in the London Borough of Lewisham. As this building is statutory listed, consideration needs to be given to its preservation, including specific consideration of any impact on the setting or important views and sightlines. In particular, the building is located off Deptford High Street.

2.17 While the proposed building would result in a perceptible change in the broader background, it is considered that the massing and overall design would sit comfortably with the listed building, this is shared by Historic England.

2.18 Views 33-35 of the HTVIA set out the impact of the proposed development on the Grade I listed St Paul's Deptford in views from the far west end of the churchyard by Deptford High Street. The proposed tall building development appears well screened by trees in these views. While the proposed development may be visible in kinetic views along the pathway closer to the west porch of the church, it is unlikely to visually compete with the church or break its roofline in important views. It is considered that the design as proposed provides an appropriate response without dominating the listed building.

2.19 Overall it is considered that the application proposals will not harm the special interest of the Grade I St Paul's Deptford and its significance will be preserved.

Pepys Building (Grade II)

2.20 When approaching from the east on College Way there would be limited change as the views themselves are currently heavily influenced by the existing built form and mature trees and other obstructions, especially with the

completed Creekside Village East Scheme. However, when closer to the Pepys Building, there would be a noticeable change in relationship given the application proposals will be seen behind the Grade II Pepys Building but only in views from College Way.

2.21 It is further noted that, the principal elevation is that facing north towards the river which features a highly decorative elevation with statuary placed within small niches. This principal elevation will not be affected by the application proposals. This would mean the prominent part of the front elevation of the building would not be impacted. Importantly, it is noted that the proposed building is significantly separated from the listed building.

2.22 However, the scheme has been considered by Historic England and Council's Conservation Officer who both consider that the proposed buildings will appear of a greater height and prominence in the skyline and would therefore cause some harm to the setting. In view of the nature of the impact, it is concluded that the development would result in less than substantial harm to the setting of the Pepys Building.

All other listed buildings

2.23 The proposed building would not detract from the value of these listed buildings and it is noted that the building is not located within the immediate settings of the listed buildings. Given the above, it is considered that the design of the building and the separation distances are considered sufficient that it would not cause harm to any other listed buildings.

Conclusion

2.24 Overall, it is considered that the proposal would ensure that the character and appearance of the St Paul's Conservation Area and West Greenwich Conservation Area would be preserved and would have no detrimental impact on the Deptford Creekside Conservation Area. In terms of the listed buildings, the development would preserve the significance of all listed buildings other than the Pepys Building as identified.

2.25 For the purposes of the National Planning Policy Framework (Framework), the conservation areas, listed buildings and WHS identified are designated heritage assets. Within the overall context, it is considered that the proposal would lead to less than substantial harm to the significance of the Pepys building and to the WHS specifically the view from College Way towards St Mary's gate. The Framework indicates that such harm is to be weighed against the public benefits of the scheme, which include 129 new homes, of which 20 % (26 units) will be

affordable as London Living Rent. In addition, the proposal includes the inclusion of 791sqm of co-working office floorspace (Use Class B1a) and 64sqm of café floorspace (Use Class A3) which would provide for 72 additional jobs onsite. Improvements to Norman Road and promotion of sustainable transportation including CS4 with associated cycling and car club membership; public open space improvements opening up access to Creek Walk to allow the appreciation of Deptford Creek; and the provision of a seed barge for the Creekside Education Trust (CET) to run for educational uses. It is considered that taking all the identified public benefits into account, they clearly outweigh the less than substantial harm identified to two heritage assets and as such the proposal would accord with the aims and objectives of London Plan policy 7.8, section 12 of the NPPF and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3.0 Conditions and Reasons for Application Reference 18/4530/F (update to Appendix 2 of the main report)

- 3.1 The following three conditions and on informative are additional relating to roof garden sound insulation, operational use impacts and noise criteria for balconies.

66. Roof Garden Sound Insulation

- A. Prior to the completion of the superstructure details of the proposed sound insulation scheme to be implemented between the residential accommodation and the roof garden shall be submitted to and approved by the Local Planning Authority. Details should include airborne and impact sound insulation.

- B. Prior to first occupation the developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed.

Reason: In order to safeguard the amenities of occupants of the residential properties and to ensure compliance with Policies 3.5 and 7.15 of the London Plan (2016) and Policies DH1 and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

67. Operational Use of the Development

Operational use of the building could generate noise affecting local residents. Use of amplified music/speech; noise from traffic and/or car parking; and deliveries outside daytime hours could cause loss of amenity or nuisance. A noise impact assessment is therefore required to highlight any potential noise

problems and propose suitable mitigation. This assessment needs to be submitted to and approved by the Local Planning Authority. The approved mitigation scheme must be implemented prior to start of trading.

Reason: In order to ensure the development to safeguard the amenities of neighbouring properties and the area generally, to prevent 'ambient noise creep' and to ensure compliance with Policies 3.5 and 7.15 of the London Plan (2016) and Policies DH1 and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

68. Noise Criteria - Balconies

The development hereby permitted shall meet the following noise criteria:

1. The rating levels according to BS 4142: 2014 on balconies due to all industrial and wharf sources operating at a cumulative maximum shall not be more than 5 dB above existing background noise levels during the daytime (0700 -2300).
2. For public / private outdoor areas (i.e. gardens and balconies) the maximum target noise level shall be as specified within BS8233:2014. i.e.; LAeq 55 dB [BS 8233:2014 'upper guideline value'].

Prior to the commencement of any above ground works in connection with the development hereby permitted full details of any mitigation measures required in order to meet the above criteria and, where relevant, details of any alternative means of ventilation or cooling, shall be submitted to and approved in writing by the Local Planning Authority and the mitigation shall be installed in accordance with the approved details prior to the first occupation of the residential units hereby permitted.

Reason: In order to protect the amenity of future occupants of the development and to minimise the potential for conflict with the nearby safeguarded wharf in accordance with policies D1 and H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and policy 7.26 of the London Plan (2016).

Informatives:

1. The applicant is advised that the 'target noise level' referred to in Condition 68 (Noise Criteria - Balconies) is also known as a 'guideline value' and that in the Local Planning Authority's consideration of the details to be submitted it will have regard to the conclusions of the submitted Acoustic

Report which demonstrates that the target noise level may not be achievable in all circumstances.

3.2 All other conditions recommended in Appendix 2 of the main report remain unchanged.

Background Papers

National Planning Policy Framework (2019)
Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990
Planning Practice Guidance
The London Plan (2016)
Minor Alterations to the London Plan (March 2016)
Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014)

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