

PLANNING BOARD	Agenda Item: 7
17 March 2020	Reference No: 19/3063/R

Applicant: Greenwich Millennium Village Ltd
Agent: SW Planning Ltd

Site Address: Plot 202, Parcel 2, Greenwich Millennium Village, 3-5 Peartree Way, Greenwich, SE10	Ward: Peninsula Ward Application Type: Reserved matters
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1.0 Recommendation

The Board is requested to:

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

Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated 14/11/2019 (Reference: 19/1545/MA) for the construction of 122 residential dwellings, 152 sqm GEA Class A3 Cafe, 500 sqm Class D1 nursery, plus associated infrastructure, landscape and car parking on Plot 202.

2. Authorise the Assistant Director of Planning & Building Control to:

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

2.0 Executive Summary

- 2.1 Officers have considered the circumstances of this application against the relevant development plan policies in the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), the London Plan (2016), the National Planning Policy Framework and National Planning Practice Guidance and have concluded that:

- 2.2 The principle of redevelopment and general parameters for the proposed were established by the outline consent. These are discussed further within the relevant section, and include design (heights & footprint), access, uses, sustainability, parking, affordable housing, and family units.
- 2.3 The application site is constrained by contaminated land which prevents underground parking/basements and noise from the adjoining Aggregates Works which can operate 24/7 meaning the proposed requires extensive acoustic mitigation. These site constraints have been accounted for within the proposal.
- 2.4 The proposed is designed as a podium block which then centres around a communal courtyard with parking provision underneath. The proposed has a subtler colour strategy to earlier plots although follows the design strategy for now consented Plot 301 development. Light buff brick and glazed brick are proposed as the main material types. It is considered that the proposed is well designed.
- 2.5 The application proposes a total of 122 units.
- 2.6 The proposed includes 14.75% affordable housing, whilst this is below the requirements of the masterplan which requires 20%; taking account of the proposed and the consented scheme, the masterplan is delivering 20.2% affordable housing meaning there is currently a slight over delivery and there is no requirement to provide the 20% affordable housing on a plot by plot basis. In addition, the application has been subject to viability testing, which confirmed that no further units could be provided.
- 2.7 The application has been subject to consultation with statutory consultees, local residents and interested groups. A total of four objections have been received from local residents. These are detailed in Section 9 of this report along with the responses from internal and external consultees.
- 2.8 The scheme is not liable to Mayoral or Borough CIL as the outline consent was approved prior to the adoption of either. The outline consent was subject to a number of financial and non-financial obligations, secured through a Section 106. These are applicable to this plot also.
- 2.9 The application is considered to comply with the parameters of the outline consent and is recommended for approval.

3.0 Summary

3.1 Detailed below is a summary of the application:

The Site -	
Site Area (m ²)	0.6ha
Local Plan Allocation	Part of site allocation GP9 for Residential and A, BI and D uses
Heritage Assets	Not applicable
Tree Preservation Order	No
Flood Risk Zone	Flood Zone 3 - Area benefiting from flood defences

Proposed Building	
Building height (metres AOD)	43.280 AOD m
No. of storeys	Maximum 11 storeys with elements at 7, 6, and 3 stories facing the street and a 1 storey central podium
Floor area (GEA) (m ²)	15,224m ²

Housing		
Density	Units per Hectare (u/ha) and/or Habitable Rooms per Hectare (hr/ha)	203u/ha 663hr/ha
Dwelling Mix	Studio (no. / %)	0 / 0%
	1-bed (no. / %)	17 / 14%
	2-bed (no. / %)	66 / 54%
	3-bed (no. / %)	34 / 28%
	4-bed (no. / %)	5 / 4%
	Total (no. / %)	122 / 100%
Affordable Housing / Tenure Split	Overall Affordable Housing (no. / %)	18 / 14.75%
	Affordable Rent (no. / %)	13 / 72%
	Intermediate / Shared Ownership (no. / %)	5 / 28%
	Private (no. / %)	104 / 85.25%
	Commuted Sum	-

Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes
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Transportation		
Car Parking	No. existing car parking spaces	0
	No. Proposed Car Parking Spaces	23
	Proposed Parking Ratio	0.18:1
Cycle Parking	No. Proposed Cycle Parking	236 long stay & 34 visitor spaces
	Complies with policy	Yes
Public Transport	PTAL Rating	2

Sustainability / Energy	
BREEAM Rating	'Outstanding' rating is required by Condition 51 of the Outline Planning Permission
Renewable Energy Source (%)	9%

Public Consultation	
Number in Support	0
Number of objections	4
Main issues raised	<ul style="list-style-type: none"> Overshadowing of Southern Park and the Ecology Park <p>This is addressed in Section 19 of the report</p>

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

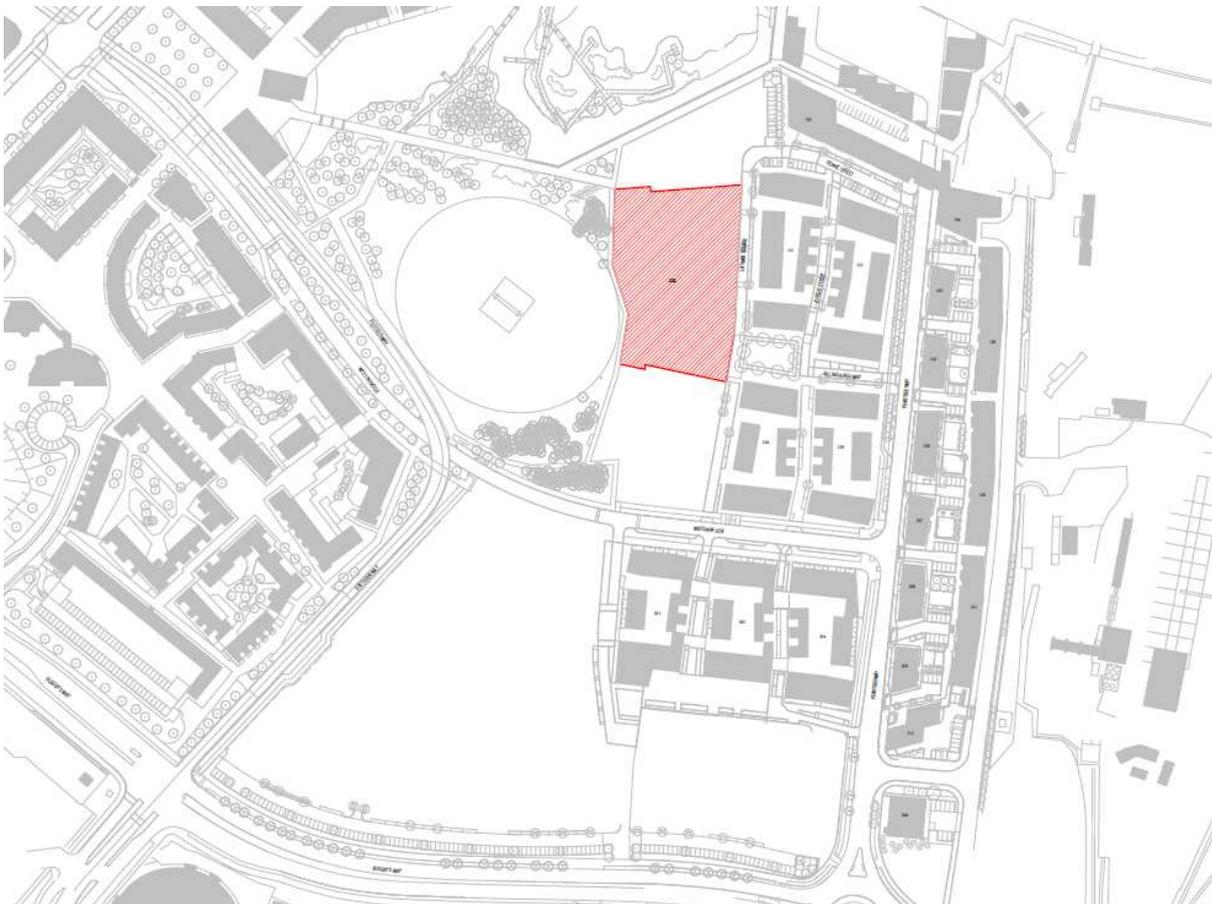
3.3 The application is considered acceptable and is recommended for approval, subject to Section I of this report.

4.0 **Site**

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

4.2 This reserved matters application relates specifically to Plot 202 of the development.

4.3 The following shows the site location plan for the reserved matters application (as hatched below):



5.0 **Site and Surrounding Area**

5.1 The application site forms Plot 202 of the Greenwich Millennium Village (GMV345) development and comprises an area of approximately 0.7 hectares.

5.2 The application site is currently unused.

- 5.3 The site area forms part of the wider redevelopment site known as Greenwich Millennium Village (GMV) Phases 3, 4 and 5 which has outline planning permission to be developed for 1,746 residential dwellings, commercial, retail and community uses by the outline permission dated (“the Outline Planning Permission / OPP”). Planning permission 12/0022/O as amended by 14/1633/MA and 19/1545/MA reserves all matters except for access and Parcel 1.
- 5.4 To the east are Plots 101 and 102 which received detailed consent under the hybrid outline planning permission in 2012 under planning reference: 12/0022/O. These Plots have now been built and occupied and comprise of six storey apartment block bookends with residential town houses and courtyard houses in the centre. The townhouses sit adjacent to the application site and are three storeys in height.
- 5.5 To the north of the application site is Plot 201 which has outline planning consent for a residential block of up to 20 storeys. Reserved Matters consent was refused in 2018 for a 13-storey residential block, under planning reference: 18/0825/R. The applicant appealed this decision (appeal reference: APP/E5330/W/19/3228947) and the proposal was allowed by the Inspector. In addition, the applicant has applied for a new Ecology Park Visitors Centre adjacent to Plot 201, to the north of Plot 202. This is being considered under planning reference: 19/4092/F.
- 5.6 Southern Park is located to the west of the application site and shall be separated from the residential block by the proposed eco-swale to be delivered by the applicant. The Greenwich Peninsula Ecology Park sits to the north of Southern Park and together they form a Site of Importance for Nature Conservation (No.NC23 in Table 13 of the Local Plan).
- 5.7 To the south is Plot 203, which is yet to be granted reserved matters consent but has outline consent for C3 residential use with some D1 and/or D2 with consented heights of 11, 8, 6 and 5 storeys with a 2-storey element in the centre. An application for reserved matters consent has been received and is being considered under planning reference: 19/4008/R.

6.0 Relevant Planning History

- 6.1 Planning permission was initially granted on 30 March 2012 for a hybrid outline planning application for 1,746 residential units and 6,902 sq.m of non-residential floorspace comprising A1/A2/A3/A4/B1/ D1 and D2 uses; and full details for Parcel 1 for 459 of the residential units, an energy centre, open

space, hard and soft landscaping, associated car parking, servicing, highways and transport works and ancillary works (Ref. 12/0022/O).

- 6.2 09.04.2014 – Reserved Matters (appearance, layout, scale and landscaping), for Parcel 2 Sub-Phase 1 of Greenwich Millennium Village Phases 3, 4 & 5 pursuant to Condition 2 of Outline planning permission dated 30/03/2012 (Ref: 12/0022/O) for the erection of 83 residential dwellings including associated infrastructure and car parking (Ref: 13/3281/R). This application was approved.
- 6.3 23.12.2014 - Minor Material Amendment under s73 to vary condition 1 (Approved Plans) of outline planning permission dated 30/03/12 (ref: 12/0022/O) involving changes to the footprint, no. of units, floorspace, elevations and associated landscaping in respect of Block 107. The application was approved and the scheme has been implemented.
- 6.4 24.02.2017 - Reserved Matters (Appearance, Landscaping, Layout and Scale) pursuant to condition 2 of planning permission dated 23/21/2014 (Reference: 14/1633/MA) for the erection of an energy centre (EC2) and associated infrastructure, landscape and parking was received for Plot 504. This application was approved (reference: 17/0576/R).
- 6.5 21.06.2017 - Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to Condition 2 of Planning Permission dated 24/12/2014 (Reference: 14/1633/MA) for the construction of 112 residential units with associated landscaping, infrastructure and parking was received for Plots 204 & 205. This application was approved (reference: 17/1631/R).
- 6.6 11.05.2018 - Environmental Impact Assessment Screening Opinion under the Town & Country Planning (EIA) Regulations 2011 for the construction of 170 residential dwellings and 613 sq. m. GEA Class A1-A4 retail/commercial units, associated infrastructure, landscape and car parking plus temporary vehicle turning area for refuse/servicing vehicles and temporary GMV345 Concierge and Management Suite, situated immediately south of the site found that an Environmental Impact Assessment was Not Required for this development (ref: 18/1405/EIA).
- 6.7 05.09.2018 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Outline Planning Permission dated: 24/12/2014 (Reference 14/1633/MA) for the construction of 170 residential dwellings and 613 sqm GEA Class A1-A4 retail/commercial units, associated infrastructure, landscape and car parking plus temporary vehicle turning area for refuse/servicing vehicles and temporary GMV345 Concierge and

Management Suite, situated immediately south of the site (18/1318/R). This application was approved.

- 6.8 14.11.2018 - Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated: 23/12/2014 (Reference 14/1633/MA) for the construction of 65 residential dwellings, with residents lounge, plus associated infrastructure, landscape and car parking on Plot 201 (reference: 18/0825/R). This application was refused, following an appeal by the application the development was allowed by the Planning Inspectorate (APP/E5330/W/19/3228947).
- 6.9 11.06.2019 - Section 96a of the Town & Country Planning Act 1990 for a non-material amendment in connection with the planning permission 14/1633/MA, dated 23/12/2014 for the application for Minor Material Amendment under s73 to vary condition 1 (Approved Plans) of outline planning permission dated 30/03/12 (ref: 12/0022/O) involving changes to the footprint, no. of units, floorspace, elevations and associated landscaping in respect of Block 107 to allow:
- Amendment to wording of Condition 14 (Density) in respect of Parcel 3 and Parcel 5.
- This application was approved (reference: 19/1636/NM).
- 6.10 09.09.2019 - Section 73 of the Town & Country Planning Act 1990 for a minor material amendment in connection with the planning permission 14/1633/MA (dated 23/12/2014) for mixed use development comprising: up to a total of 1,746 Class C3 residential units; up to a total of 1,190 sq.m (GEA) Flexible Class A1 (shops) and/or A2 (financial and professional services) and/or A3 (restaurants and cafes) and/or A4 (drinking establishments); up to a total of 4,462 sq.m (GEA) business space for B1(a) (offices) and/or B1(b) (research and development) and/or B1(c) (light industry); up to 500 sq.m (GEA) Class D1 for a children's nursery; up to a total of 750 sq.m (GEA) Class D2 for community space and a management facility; up to a total of 992 sq.m (GEA) for two energy centres; associated open space, hard and soft landscaping, car parking and servicing, highways and transport works and ancillary works; with all matters reserved for future approval except for access (Outline Application). In addition to the matters set out above, full details (access, appearance, landscaping, layout, scale) in relation to the first sub-phase, being Parcel 1, located to the north and east of the site for: 459 residential units; a 365 sq.m energy centre; associated open space, hard and soft landscaping, car parking and servicing, highways and transport works and ancillary works.

To allow:

- Amendment to density requirement
- Redistribution of non-residential floor space
- Reduction in Car Parking Provision
- Revision to Phasing
- Increase in height by 1m on Plots 202, 203, 301, 401-405, 501-503

This application was approved (reference: 19/1545/MA).

- 6.11 04.09.2019 - Environmental Impact Assessment Screening Opinion under the Town & Country Planning (EIA) Regulations 2017 for Plot 301 for the construction of 135 residential dwellings, ancillary residents screening room plus associated infrastructure, landscape and car parking.
- 6.11.1 It was determined that an Environmental Statement was not required to accompany the reserved matters application as the proposal does not result in a significant effect on the environment beyond that which has already been considered (reference: 19/2216/EIA).
- 6.12 11.11.2019 - Submission of reserved matters application (appearance, layout, scale + landscaping) pursuant to condition 2 of planning permission dated 23/12/2014 (Ref: 14/1633/MA) for the construction of 135 residential dwellings, ancillary residents screening room plus associated infrastructure, landscape and car parking (Plot 301).
This application was approved (reference: 19/2055/R).
- 6.13 21.11.2019 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated 14/11/2019 (Reference 19/1545/MA) for the construction of 119 residential dwellings, 750 sqm GEA Class D2 Community Centre and Management Facility, plus associated infrastructure, landscape and car parking on Plot 203. This application is currently being considered (reference: 19/4008/R)
- 6.14 02.12.2019 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission dated 14/11/2019 (Reference 19/1545/MA) for the construction of 65 residential dwellings with resident's lounge, plus associated infrastructure, landscape and car parking on Plot 201.
This application is currently being considered (reference: 19/4064/R)
- 6.15 03.12.2019 - Submission of Reserved Matters (Appearance, Layout, Scale and Landscaping) pursuant to condition 2 of Planning Permission Reference 19/1545/MA for the construction of 489 residential dwellings, plus associated

infrastructure, landscape, car parking and associated works at Plots 401, 402, 403, 404 and 405 (Parcel 4).

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

6.16 13.12.2019 - Reserved matters application seeking approval of appearance, layout, scale and landscaping, for Plot 501, 502 and 503 (Parcel 5) of Greenwich Millennium Village Phases 3, 4 & 5 development (GMV 345) pursuant to Condition 2 of outline planning permission reference 19/1545/MA dated: 14/11/2019, involving the provision of 4,887 sqm of commercial floorspace (comprising 4,462sqm of Use Class B1 floorspace and 425sqm of Use Class A1 and/or A2 and/or A3 and/or A4 floorspace), plus associated infrastructure, landscape and car parking.

This application is currently being considered (reference: 19/4058/R).

6.17 19.12.2019 - Removal of the existing Gatehouse and adjoining buildings and the erection of a new Ecology Park Building to also include the diversion of the cycle path and associated ecological works.

This application is currently being considered (reference: 19/4092/F)

7.0 Proposal

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

7.2 The detailed design of Plot 202 was reserved for approval through the submission of Reserved Matters applications. In particular, the external appearance, internal layout, scales and landscaping has been reserved for future consideration.

7.3 Reserved Matters consent is sought for the construction of 122 residential dwellings, 152 sqm GEA Class A3 Cafe, 501 sqm Class D1 nursery, plus associated infrastructure, landscape and car parking on Plot 202.

7.4 The application proposes a total of 122 residential units. The breakdown of housing is as follows:

	Private	Affordable Rented	Shared ownership	Total
1 bed	17	0	0	17
2 bed	58	3	5	66
3 bed	29	5	0	34
4 bed	0	5	0	5
Total	104	13	5	122
Percentage	85%	10%	5%	100%

8.0 **Consultation**

8.1 **Statutory Consultees**

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

Details of Representation	Summary of Comments	Officers comments
Environment Agency	<p>Advised no objection and make the following comments:</p> <p>We support the creation of the ECO swale, from a biodiversity and sustainable urban drainage position.</p> <p>However we recommend that the applicant consider whether the channel for the eco swale which is primarily for surface water drainage will provide sufficient frequency of water to support Reed species.</p> <p>The EA further recommend that an informative be added:</p> <p>We recommend that the majority of planting in the</p>	The informative will be included.

	communal gardens is native and of local provenance where possible.	
London Fire & Emergency Planning	No comments have been received.	
Transport for London (TfL)	In conclusion, whilst TfL has no principle objections to the proposal, further information should be provided on the details of cycle and car parking at discharge of condition stage which may affect issues of layout and landscaping. Nothing in this comment should be taken as approval of those other conditions.	The applicant has advised that a number of options have been tested and this can be complied with at the discharge of conditions stage. An informative is proposed to remind the applicant of these requirements.
London City Airport	Recommended that a condition be attached to the reserved matters application	The conditions are set out in Appendix 2 of this report.
Port of London Authority	No objection to the proposed. The PLA further request that they be consulted on conditions 87 and 88.	
GLA	No comments have been received.	As this is a reserved matters application, no comments are required from the GLA to proceed
Natural England	No comments have been received.	
Thames Water	Advised no objection	Noted
Crime Prevention Officer	The scheme should comply with Design Homes 2019 rather than	It is recommended that compliance with Design Homes 2019 be imposed

	Design Homes 2016 as set out in the DAS	as a condition as set out in Appendix 2 of this report.
GLAAS	Confirmed no objection to the proposal	Noted

8.3 Council Departments

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

Details of Representation	Summary of Comments	Officers comments
Environmental Health	The application has been reviewed and is found to be acceptable.	
Housing	The proposal complies with the requirements of the Outline Consent and is therefore acceptable.	Housing is discussed in Section 15 of this report.
Waste Services	Quantity and types of bins provided is accepted and further details of the bulky waste has been provided and found to be acceptable.	Waste is discussed in Section 23 of this report.
Sustainability and Renewal	Following detailed discussions, the application is considered acceptable with an outstanding query remaining.	This shall be reported on within an addendum report.
Transport and Highways	No highway objection is raised.	
Occupational Therapist	OTs initially raised an objection to the application as the proposed wheelchair adaptable units did not appear to comply with Part M. Revised plans have been provided which the applicant has advised	This shall be reported on within an addendum report.

	comply with the requirements of Part M and are currently under review.	
Early Years	The Early Years team have objected to the application on the basis that the outdoor amenity space for the nursery is not sufficiently sized.	<p>The Ofsted requirements and the Statutory framework for the early years foundation stage (Published March 2017) do not specify the size of the open space. As open space is provided, and the applicant is compliant with the requirements of the outline planning consent, it is considered that the nursery is acceptable subject to conditions.</p> <p>This is discussed further in Section 12 of the report.</p>
Flood Risk Manager	<p>It needs to be made clear who will have overall responsibility to ensure the drainage system will perform as designed for the lifetime of the development, as the maintenance section is extremely ambiguous on this matter.</p> <p>The applicant has been asked to provide a response.</p>	<p>GMVL have confirmed that following completion of the works, it is the intention to transfer the ecoswale land and management to the Land Trust (or other suitably qualified management company).</p> <p>The proposed SuD's drainage measures relating to the building will be managed by a suitable qualified management company on completion of the scheme. Full details of this are to be required by condition. This is set out in Appendix 2 of this report.</p> <p>The Surface Water Drainage Strategy Report</p>

		has been updated (Section 8) to reflect the above
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8.5 Local Residents

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

Summary of Comments	Officers comments
The proposal will overshadow the ecology park and result in a negative ecological impact.	The impact on ecology is discussed in Section 18 of this report.

8.7 Amenity Groups

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

9.0 Planning Context

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

National Planning Policy Framework (NPPF – 2019)
Technical Housing Standards – Nationally Described Space Standard (Department for Communities and Local Government – March 2015)

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

The 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.

9.2 In addition to the above, Officers also have regard to the Draft London Plan, which has completed the Examination in Public and has now reached an advanced stage in the adoption process. As such the Draft London Plan is a material consideration in the determination of planning applications and decision makers can now attach more weight to its policies. The draft London Plan however does not hold full weight until formally adopted and until this

time applications will continue to be determined in accordance with the current Local Plan and policies.

10.0 Material Planning Considerations

10.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application (Ref: 19/3063/R):

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

11.0 Principle of Development / Compliance with the outline consent

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

11.2 The 2012 outline application and 2014 amendment gave consent for eleven, eight, six, five and two storey building with the potential to provide a mixed use development (including Class D1 / D2) with the majority being C3 residential. The 2019 amendment introduced a café use (Class A3) within this plot.

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

- 11.4 A review of the Environmental Statement finds that the site has been suitably assessed in terms of a worst-case scenario. An EIA Screening Opinion concluded that the subsequent application (the reserved matters) did not indicate a change in circumstance from the initial Environmental Impact Assessment as was undertaken to support 12/0022/O and further assessments were not required.
- 11.5 The proposed is considered to be in substantial accordance with the outline consent and no in principle objection is raised.

12.0 Use of Plot 202

- 12.1 Plot 202 has planning consent for a mixed-use development including Class D1 / D2 / A3 and C3 residential. Reserved Matters consent is now sought for 122 residential dwellings (Class C3), 152 sqm GEA Café (Class A3), 501 sqm nursery (Class D1), plus associated infrastructure, landscape and car parking. The A3 use was introduced in the 2019 Material Amendment (ref: 19/1545/MA).
- 12.2 The 2019 Material Amendment introduced minimum (condition 101) and maximum provision (condition 11). This is summarised in the following table:

Use Class	Maximum (sqm)	Minimum (sqm)
A1-A4	1,190	657
B1	4,462	4200
D1 (Nursery)	500	470
D1 / D2 (Community Space)	750	730

- 12.3 To date, the applicant has provided 613 sqm of A1-A4 floorspace in Plots 302-304 (consented under planning reference: 18/1318/R). This application proposes an 500 sqm of D1 floor space and 152 sqm of A1 floorspace (creating a total of sqm 765 sqm site side). This is in line with the conditions attached to the outline planning consent.
- 12.4 The application also includes the provision of a nursery. This has been designed based on the parameters of the outline consent and measures 500 sqm GEA. The nursery includes an outside area measuring 207 sqm and the internal area measures 250 sqm. The nursery will accommodate 75 child places. For 75 children, a minimum of 17.6 staff members would be required to work directly with the children within the rooms dedicated as play areas. In addition, 3 admin/kitchen staff may also be required. The applicant has

designed the nursery to meet the maximum size permitted by the outline planning consent.

- 12.5 The Early Years team have reviewed the application and noted that some elements are not fixed at this stage as an end user has not yet been identified. It is recommended that a condition be imposed requiring details to be provided prior to above ground works commencing to ensure the necessary requirements are incorporated into the scheme and that build out does not progress beyond the point of incorporating these requirements. The Early Years team have raised an issue with the amount of outside space that is being provided. The applicant is constrained by the consented outline parameters which required a nursery for 75 children and that the space was fixed at a maximum of 500 sqm. The supporting text of Policy CHI states that educational facilities must comply with Ofsted requirements (paragraph 4.7.15 of the Core Strategy). Ofsted space standards do not specify how the space is to be set out although do require both indoor and outdoor space. Additionally, the Statutory framework for the early years foundation stage (Published March 2017) states at Paragraph 3.58 that providers must provide access to an outdoor play area or, if that is not possible, ensure that outdoor activities are planned and taken on a daily basis (unless circumstances make this inappropriate, for example unsafe weather conditions). Given that the proposed is complying with the requirements of the outline planning permission and does provide both indoor and outdoor facilities, it is considered that the proposal is acceptable in this instance. It is recommended that a condition be imposed on the reserved matters application to require details of the management strategy to ensure outdoor activities are planned and taken daily prior to the occupation of the nursery.
- 12.6 Given the proposed is in line with the parameters set by the outline consent, no objection is raised in principle. Further details of the internal fit out of the nursery shall be required by condition to ensure that a suitable arrangement is delivered as the proposed shows indicative layouts only at this stage as an end user has not yet been identified.
- 12.7 In addition to the nursery, a Class A3 Café unit is proposed within Plot 202. This is to be located to the south-west corner of the building. The Café benefits from a triple aspect enclosure, with direct access to the Northern Square and the Nursery on the eastern side, the main pedestrian footpath on the southern side connecting Northern Square to Southern Park and another public foot / cycle path on the western side which runs along the swale. An external seating area is also proposed as part of the application. The café is considered to be a benefit to the residents and local community, adding to the sense of community and vibrancy of the masterplan.

13.0 **Density**

- 13.1 Policy 3.4 requires development to optimise housing output, subject to Chapter 7 (Living Spaces and Places) also being met. The supporting text notes that ‘a rigorous appreciation of housing density is crucial to realising the optimum potential of sites’ emphasising that it is only one part of the decision-making process.
- 13.2 Based on the character, location of the site and the proposed development to be bought forward, it is considered the setting of the site is best described as Central in character. It is noted that the site does not fulfil the definition set out in London Policy 3.4; however, it is considered to more closely match the definition for central than urban given the building footprint and heights allowed by the outline consent.
- 13.3 Table 3.2 is a density matrix based on the suburban, urban or central nature of the sites location and accounting for the sites PTAL rating. This table should not be applied ‘mechanistically’ and decision makers must consider the broader context (for example transport capacity, social infrastructure, local context etc.).
- 13.4 Using this table, the density range for this site should be 300-650 hr/ha and 100–240 u/ha for a central site with a PTAL of 2-3. This site has a PTAL of 2.
- 13.5 Notwithstanding the policy context, the outline consent restricts the density for the site as follows:

Condition 14 - Density

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

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

- 13.6 The proposed provides 122 dwellings and 398 habitable rooms within a site area of 0.6ha, the café measures 152 sqm and the nursery measures 500 sqm. Calculated as a net density in line with the Mayor’s Housing SPG, the site has a density of 203 dwellings per hectare and 663 habitable rooms per hectare. The scale and density of the proposal is well within the parameters of the

Outline Planning Permission. The proposed is slightly above London Plan Policy 3.4, however it is clear that the Policy directs decision makers to not use the matrix mechanistically and the proposed is only slightly above and given the fact that the proposed is in line with the Outline Planning Permission no objection is raised.

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

- 14.1 Policy 7.4 of the London Plan requires that development have regard to the local character, by considering “form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings”. Policy 7.5 further emphasises the need for development to “relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces”. Policy 7.6 of the London Plan states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 14.2 Policy DHI of the Core Strategy requires that all developments be of a high-quality design and demonstrate that they positively contribute to the built and natural environment. The policy goes on to list the expectations of new development in achieving this policy aim.
- 14.3 Policy DHI is consistent with the NPPF which asserts in Chapter 12 (Achieving well-designed places) which sets out that “the creation of high quality buildings and places is fundamental to what the planning and development process should achieve”.
- 14.4 The Design and Access Statement submitted in support of the application sets out the various constraints for the site and details the conceptualisation of the design for these plots. The site constraints are listed as: noise from aggregates wharf, vehicular route (West Parkside & Peartree Way), plots under construction, contaminated land.
- 14.5 The overall layout, scale and massing of Plot 202 was established by the outline consent. The site occupies a prominent location in the masterplan and sits opposite the park; meaning careful consideration of the design is required to ensure the scheme suitably responds to its location. Plot 202 and along with Plot 203 and Plot 301 create the boundary to Southern Park. It is therefore important that the elevational treatment responds to this location and that the buildings are considered together. It is noted that Plot 301 has received reserved matters consent (reference: 19/2055/R).

- 14.6 The parameter plans consented by the Outline Planning Permission granted consent for a single building at Plot 202 with a maximum height of 11 storeys (44.15m AOD), with elements at 8 storeys (34.70m AOD), 6 storeys (28.40m AOD), 5 storeys (25.25m) and 2 storeys (13.80m AOD). The land use plan consented by 19/1545/MA included residential C3 with provision for possible D1/D2/A3 floor space. Foot and cycle paths were consented on the north and west of the Plot with a primary estate road to the east and a secondary estate road to the south. There is an area of existing on street parking to the north of the plot and the parameters allow for on street parking to the south of the plot and podium parking in the centre. The parameters include a residential courtyard in the centre.
- 14.7 Plot 202 is designed with a maximum height of 11 storeys. The proposal also includes lower elements with elements at 10, 7, 6, and 4 storeys facing the street and a 2-storey element in the centre creating the podium. A podium block has been consented at Plot 301 (19/2055/R). The taller elements of the massing will surround an inner courtyard which shall be used as a communal space; beneath this will be the car parking. Parts of the massing have been cut away to ensure the central courtyard benefits from sunlight/daylight and to create an interesting design when experienced at street level by introducing a sense of differentiation to avoid an overly bulky structure.
- 14.8 Three out of the four sides of the block will include flatted accommodation with the remaining side facing onto Rennie Street provided three storey townhouses. This will create a more intimate street scale on Rennie Street when set with the existing context of Plot 201 which also includes townhouses although at four storeys.
- 14.9 The materials used at Plot 202 consist of primarily brick, with glazed bricks being used at the high levels on the north and west elevations and in some places along the ground floor. The materials are proposed as light grey textured brick with colour matched mortar, glazed brick in colour yellow and bronze PPC aluminium for bar balcony railings and window frames. The nursery will also include an introduction of colour and shall use coloured concrete, this coloured façade faces onto the square. This is a reduced palette from the previous plots based on lessons learned about overuse of colour and differing brick types, the style is similar to Plot 301 whilst maintaining an individual character. Feature brickwork panels are used on the taller parts of the building to aid the composition of the facades. Indicative materials can be found in the Design and Access Statement. A condition requiring facing materials to be submitted prior to commencement is already required by 12/0022/O as amended by 14/1633/MA (Condition 15).

- 14.10 The edges of the podium have been designed to allow some view of the green landscaping when walking at street level enhancing the pedestrian experience.
- 14.11 A rational, regular grid has been applied to the elevation to create a strong and expressive façade. Both inset and projecting balconies are proposed to animate the façade.
- 14.12 The application is also accompanied by a landscaping proposal (set out in TM360R03A Landscaping Statement). It should be noted that the outline consent requires that further details of landscaping be provided by way of condition. However, in terms of visual impact, the landscaping proposal is considered to enhance the public realm and be a positive feature of the scheme. No concerns are raised regarding the visual design of the landscaping. Landscaping is discussed further in Section 17 of this report.
- 14.13 The affordable units are located within the lower units of the 8 storey element on the southern part of the block above the nursery and include the five townhouses. The scheme has been designed to be tenure blind, with Plot 202 being designed as one building in terms of the massing, appearance and use with no differentiation in appearance, the use of materials or colours, or spaces standards between the different tenures. The cores are of similar sizes and will be completed with similar quality in materials and finish. The affordable units access flats via a separate core (Core C) which is smaller in scale to the two other cores serving the building (Cores A & B); however, this is due to Core C serving only 8 units compared to approximately 50 units each.
- 14.14 The design effect is considered to be appropriate and visually attractive and overall accords with the design rationale for the wider site.

15.0 Residential Accommodation

Housing Mix

- 15.1 London Plan Policy 3.8 supports the provision of different types and sizes of dwellings to provide a choice of homes for Londoner's.
- 15.2 Local Policy H2 sets out that a mix of housing types and sizes will be required in all developments and developments should contain a proportion of 3, 4 and 4+ bedroom units. The exact mix on each site will vary according to the location of the development and the character of the surrounding area.

- 15.3 The GLA's Housing SPG (March 2016, updated August 2017) notes that while the Strategic Housing Market Assessment (SHMA) identifies a net need for family-sized market housing, this is a pan-London figure that assumes the continuation of existing patterns of under-occupation. GLA projections show nearly 70% of household growth between 2011 and 2035 will be for households without children.
- 15.4 In terms of the outline scheme family units will make up 31% of the total number of units across the GMV phases 3, 4 & 5 site and condition 13 attached to 19/1545/MA sets out that the unit mix across the masterplan shall be as follows:

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

- 15.5 The reserved matters for Plot 202 includes a mix of one and two bed units as well as three and four bed family units. The family units account for 39 out of 122 family units, equating to 32%. These are provided as both 3 bed and 4 bed units. This is therefore above the requirement for 31% family provision, however this is a site wide position.
- 15.6 At the time of submission of the Plot 202, 26% of units consented are family accommodation (277 3B+ dwellings out of 1073). This is therefore below the requirements of condition 13. The illustrative residential accommodation as submitted with the approved 2011 Masterplan anticipated a 25% family mix (292 3B+ dwellings out of 1,166) for Parcels 1-3. The current scheme follows and has tried to enhance this percentage. As anticipated within the approved 2011 Masterplan and within the 2019 S73, a 30% family mix will be achieved after completion of Parcels 4-5 and the entirety of the masterplan. The applicant will therefore be required to meet this requirement in the future phases of the masterplan.
- 15.7 Units are provided in flatted accommodation, maisonette and town houses. The townhouses are provided as socially rented units which is a positive element of the scheme. The housing team has previously raised the lack of provision of affordable units in the town houses as an issue as to date the affordable units have been provided as flatted accommodation only. As such, the proposal now being considered provides a range of unit types amongst the various tenure types.

Wheelchair units

- 15.8 A total of 12 units shall be provided for wheelchair users in line with the requirements of the planning restrictions attached to the outline consent for 10% of all dwellings.
- 15.9 10% of the private units (11 no.) will be provided as wheelchair adaptable units. These are all to be provided as 2b/3p aside from one which is 1b/2p. The provision of only 1b/2p and 2b/3p units means that the proposal is not providing a genuine mix of units. This can also be considered acceptable in this instance as there is a demand for such units meaning the proposal is contributing to this need; however the masterplan will need to be reviewed holistically to understand what has been delivered to date and the remaining plots will need to be reviewed to ensure that a genuine range of housing types are provided and that the condition is complied with.
- 15.10 The adaptable units would be built out to comply with Part M4(2) of Building Regulations and the fully accessible units shall be built in accordance with the Greenwich Wheelchair Site Brief in accordance with Condition 33. The adaptable units will be subject to a marketing period, should there be no interest in the unit as wheelchair adaptable then the applicant will be able to advertise the units for non-wheelchair users. It is recommended that a condition be imposed on the reserved matters requiring details of the marketing to be agreed in consultation with the Council's Occupational Therapist.
- 15.11 There are thirteen affordable rented dwellings. The applicant is required to provide 10% as wheelchair adapted; this creates a requirement for 1 unit when rounded. This will be a 3b/5p unit located on the ground floor. The unit is required to be designed to comply with the Greenwich Wheelchair Site Brief as per the conditions attached to the consent with additional details being provided post consent. The proposed accords with the requirements of condition 33.
- 15.12 The applicant has advised that the Affordable Rent wheelchair dwelling is situated in a corner apartment near the communal entrance of Core A allowing an easy direct access from the street, double orientation and extensive private amenity area while maintaining enough planted buffering zone. In addition, this location allows a quick and easy access to both the Park and the River path, with direct views to both. A wheelchair parking bay has been provided in the under-croft parking as close as possible to the wheelchair dwelling.

15.13 None of the Shared Ownership units are provided as wheelchair adaptable. There are 5 shared ownership units within the development and thus 10% would have equated to 1 unit when rounded up. The applicant has advised that they were not able to accommodate an adaptable unit in the shared ownership tenure in Plot 202 without affecting the mix of units due to the additional size of the unit. As this only affects 1 unit, this is considered acceptable in this instance but will need to be accommodated elsewhere within the masterplan to ensure that a suitable range and types of units are delivered in accordance with Policy H2.

15.14 The applicant has sought to position the wheelchair parking bays within the under-croft car park as close as possible to the main core entrance lobbies (one on each side) to reduce to the travelling distance.

Affordable Housing

15.15 Policy 3.12 describes the process of negotiating affordable housing provision in the decision-making process. The policy seeks to maximise the amount of affordable housing sought considering 'current and future requirements for affordable housing'. Policy 3.12 requires planning decisions to take account of 'the need to encourage rather than restrain residential development'.

15.16 The total affordable housing provision across the GMV Phases 3, 4 and 5 was considered at outline stage and the development is fixed as a minimum 20%, with a split of 70% social rented and 30% intermediate. The affordable housing provision has to some degree been front loaded with the first Parcel (Parcel 1) having 25% affordable housing. As such, later phases may well deliver less than 20%. The outline consent was considered against the policies of the Unitary Development Plan, which has now been superseded by the Core Strategy; both set out a policy requirement for 35% affordable housing. As such, the 20% provision is significantly below this requirement and a review mechanism was included in the S106. A late stage review has also been included in the legal agreement attached to 19/1545/MA, this requires a viability review to be undertaken at the occupation of 75% of dwellings.

15.17 At reserved matters stage, the S106 agreement requires a review of the viability to be submitted for approval to ascertain whether any further affordable units can be provided. The review allows for the capture of potential future uplift from schemes that would be unviable if they provided the amount of affordable housing required in terms of Development Plan policies as a means of potentially increasing the amount of affordable housing should the viability of the scheme improve.

15.18 The reserved matters application provides 18 affordable units of the total 122 making 14.75%. Of these, 13 are social rented units and 5 are shared ownership. This creates a tenure split of 70:30. As such, the proposed accords with the requirements of the outline consent in terms of tenure split although falls below the required 20% total affordable housing site wide for this plot. It is noted however that the minimum of 20% provision is on a site wide basis. As shown in the following tables, the applicant is compliant with this requirement and therefore no objection is raised.

15.19 In accordance with the requirements of the legal agreement and current policy, a viability assessment has been submitted with the application. The viability assessment concludes that the GMV development is unviable with any more than 13.9% affordable housing and that the overall provision of 20% site wide, as required by the S106, is a risk to the developer. The report found that this Plot would not be viable with any additional affordable units. This has been independently assessed and it has been verified that in current circumstances a higher level of provision of affordable housing than is currently proposed would be unviable at present.

15.20 The current consented provision of affordable housing on site is as follows:

Parcel/Plots	Affordable	Total units
Parcel 1(101-109)	113	451
Parcel 2: (201)	8	65
Parcel 2: (206-210)	15	83
Parcel 2: (204-205)	23	112
Parcel 3: (301-304)	54	305
Total	213	1,061
Percentage	20.9%	100%

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

Parcel/Plots	Affordable	Total units
Parcel 1(101-109)	113	451
Parcel 2 (Plot 201)	8	65
Parcel 2: (206-210)	15	83
Parcel 2: (204-205)	23	112
Parcel 3: (301-304)	54	305
Parcel 2: (202)*	18	122

Total	231	1,138
Percentage	20.3%	100%

*Plot being considered

15.22 As can be seen from the above, the applicant is currently slightly over providing on affordable units when compared to that which is required by the S106. There is no requirement for the 20% provision to be provided on a plot by plot basis and thus the proposed 14.75% affordable housing in Plot 202 does not conflict with the outline consent.

15.23 Given the confirmation from the assessor that the viability assessment is correct and that the total provision is in accordance with the requirements of the S106 on a site wide basis, the proposed is considered to be acceptable.

15.24 Within the 18 affordable units, 10 of these shall be delivered as family accommodation (3 and 4 beds). These will all be affordable rented accommodation. The remaining 8 shall be 2 beds (3 affordable rented units and 5 shared ownership units). As such, 56% of the affordable are therefore family units. This well beyond the required 31% site wide. The remaining applications must demonstrate that 31% of affordable units have been provided as family units' site wide.

15.25 On balance, the provision of affordable units is considered acceptable in this instance and the applicant must continue to demonstrate that they are compliant with the requirements of the outline consent on a site wide basis.

16.0 Amenity (for future residents and neighbouring properties)

16.1 Policy 3.5 of the London Plan requires development to be of the highest quality internally, as well as externally, further noting that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meeting the changing needs of Londoners over their lifetimes.

- 16.2 Core Strategy Policy H5 seeks to ensure an adequate standard of accommodation is provided to ensure satisfactory levels of residential amenity and quality of life for future occupiers.
- 16.3 The issue of noise exposure is referred to in London Plan Policy 7.15. The policy seeks to ensure that development proposals reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or within the vicinity; by separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening or internal layout; and by promoting new technologies and improved practices to reduce noise at source.
- 16.4 Core Strategy Policy E(a) seeks to avoid locating housing on site adjacent to existing problem uses, unless ameliorating measures can reasonably be taken and which can be sought through the imposition of conditions.
- 16.5 GLA's Housing SPG (March 2016, Updated August 2017) dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements. Suitable plans have been provided.

Size of units

- 16.6 An accommodation schedule has been provided to support the Planning Statement and Design and Access Statement. The accommodation schedule includes details of the size of each unit. Unit types are also shown in more detail in the Design and Access Statement.
- 16.7 The unit sizes have been considered and all of the units are found to be in accordance with the National Space standards with some units exceeding the minimum standards.

Aspect

- 16.8 The application has been designed with 44% dual aspect and 20% triple aspect units with the remaining 36% being single aspect. There are no family units that are single aspect, all single aspect units are 1b and 2b units. All single aspect units are either South facing or West facing. There are no single aspect, north facing units in the development proposal.
- 16.9 Two of the single aspect dwellings require elements of acoustic mitigation. Due the nature of the calculations on the recessed balconies, the additional screening which needs to be provided in the worst-case scenario of the 10th floor dwelling is only 8%. The rest of the required screening is already

provided by the standard glass balustrade, the enclosure of the recessed balcony and the solid down stand of the opening. On this basis and the fact that only a small number of units are affected, this is considered acceptable.

- 16.10 Three of the single aspect units are proposed as Shared Ownership units. These are all south facing units with two benefiting from views of the podium and enlarged balconies (15 sqm) and the remaining benefiting from views across the communal square. Three more of the single aspect units are proposed as affordable rented units. These also benefit from views across the communal square and are south facing. This is therefore considered acceptable in this instance.

Noise

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

- 16.15 In addition, future buildings may form screening to future phases of the development or may reflect noise back onto site, meaning the noise levels change throughout the various stages of development. As such, the applicant has considered the noise levels for each facade at the point the proposed building will be occupied and also at the completion of the master plan as a whole, and design to the worst case (i.e. the highest noise level which might occur). The report also assumes that all wharf / dredger sources operate at once given the fact that there are no restrictions in place to control the operations at the adjacent aggregates site and their operations are often based on tidal considerations.
- 16.16 As such, the proposed mitigation on the facades of the development have been informed by the results of the noise modelling from the varying noise sources. Where noise levels are above LAeq 44 dB windows of habitable rooms are to be fixed closed or to be provided with further mitigation measures to reduce noise within the limit. Non-habitable rooms will generally require fixed windows should noise levels be above LAeq 50 dB, however this will be based on the internal configuration of the property and location of non-habitable rooms in respect of habitable rooms.
- 16.17 Potential mitigation measures that may be required include: semi-enclosed balconies; fixed shut windows and additional screening to windows such as 'Juliet' additions. With these in place, all units comply with the noise criteria established by the outline consent. It should be noted that no unit is fully sealed and a suitable level of amenity is achieved for future residents. On this basis, the noise strategy is considered to protect the amenity of future occupiers in accordance with Policy requirements.
- 16.18 Except for 8 dwellings (located in the private units in Core A - two on the 5th floor, two on the 9th floor and four on the 10th floor) which will require some screening in addition to the balustrade of the recessed balcony, all the other dwellings have no additional screening on their balconies, which are accessed either from the living areas or both the living areas and bedrooms with full height window/doors. The additional screening on the 8 dwellings identified has been provided to allow the natural ventilation of the living space, with full height doors opening onto recessed balconies from either the living area or both the living area and the bedroom. The two units on the 5th and two of the units on the 10th floors are dual/triple aspect and have two or three open sides. The remaining four units are single aspect. Given that this affects only a small number of units and was a principle established by the outline consent, the proposed is considered acceptable in this instance. The agent has confirmed that the screens will be glazing and have been accounted for in the DSO assessments. The principle of the recessed balconies adopted

throughout the scheme is explained on page 53 of the Design and Access Statement. Considering the site constraints, the strategy developed is well balanced and provides reasonable amenity standards to these units.

- 16.19 It is also noted that the 'at occupation' model has considered Buildings 101 to 109, 201, 204 to 210, 301 to 304 and 504 being present (constructed). Plot 201 now has consent following the recent appeal decision (reference: APP/E5330/W/19/3228947) but has not commenced works. Plot 301 has not yet been implemented although site clearance works have begun. Given that Plots 301 and 201 are required to meet the noise requirements, a restriction on occupation of Plot 202 until these plots are complete is required.
- 16.20 It is recommended that should consent be granted a condition be imposed requiring compliance with the mitigation recommended in the Sandy Brown reports submitted with the reserved matters application. On-going testing is required in accordance with Conditions 87 and 88 also.

Overheating

- 16.21 Sealed windows give rise to potential amenity issues for future occupiers. One of these being potential for overheating. An overheating assessment has been provided with the application, assessing the risks of the spaces for current and future climate scenarios in accordance with the methodology set out in CIBSE TM59. 3D thermal models of the proposed scheme have been developed. A total of 82 habitable rooms belonging to flats on lower, mid-level and top floor levels were analysed to provide a representative sample of the space and dwelling typologies within the development. Further details of the units tested can be found in Appendix A of the Energy Statement. The applicant has undertaken an assessment against DSY1, 2 & 3 2020. 2020 (DSY1-High Emissions 50 Percentile) represents a moderately warm summer, as is interpreted in current CIBSE guidance. The years 2020 (DSY2-High Emissions 50 Percentile) and 2020 (DSY3-High Emissions 50 Percentile) were chosen as more extreme years with different types of summer: the former has a more intense single warm spell, whereas the latter represents a year with a longer period of persistent warmth. It should be noted that compliance with DSY2 and DSY3, as a more onerous data set, is not a requirement of CIBSE TM59 however these have been tested by the applicant.
- 16.22 The proposed ventilation strategy for the development entails the use of Mechanical Ventilation with Heat Recovery (MVHR) for the whole year.
- 16.23 Units with sealed windows will not be able to utilise natural ventilation for passive cooling. These units will still have overhang/recessed balconies (where

relevant) and solar control glazing as recommended for all units across the site, but without the window 'glazing free' area. All units with sealed windows will have mechanical cooling. There are no units that are fully sealed. Bedrooms may be sealed and fitted with mechanical ventilation but living rooms have access to natural ventilation as well as MVHR. The comfort cooling strategy for comprises an air source heat pump per residential unit that has been identified as requiring cooling due to the acoustic and overheating requirements. The external unit will be located on the roof and will serve a single residential unit where the occupants will have individual room controllers to maintain comfort conditions within each room that has a cooling requirement. The Controller will provide on/off control with local temperature adjustment by the occupant.

- 16.24 The report concludes that all units are likely to achieve compliance with overheating benchmarks, provided that adequate design measures are taken into account. Table 7 of the Energy strategy sets out the recommendations made in line with GLA guidance. The outline consent is also subject to a condition requiring an overheating strategy to be submitted prior to the construction of the relevant part. It is further recommended that a condition be imposed to the reserved matters application requiring compliance with the recommendations made in the energy strategy on overheating.

Sunlight / Daylight / Overshadowing

- 16.25 A sunlight/daylight assessment has been undertaken for Plot 202. This provides a number of assessments including an assessment of the levels achieved for the proposed units and surrounding blocks.
- 16.26 A daylight/sunlight assessment was carried out as part of the ES. This was an outline assessment of the parameter massing, whereas the assessment provided for the RMA now provides a more detailed analysis.
- 16.27 The ES submitted with the 2012 consent stated that the following mitigation measures will be adopted: reducing the massing of the proposed blocks to allow adequate daylighting onto the proposed and existing facades; reducing the massing of the proposed blocks at the southern end, to ensure adequate levels of sunlight onto the proposed facades (16.112). The ES goes on to state that the built development that is eventually delivered will be far less than the Parameter Plans indicated, as the blocks that come forward will not fill the complete envelopes as presented and tested (16.113). The impact on amenity spaces are also discussed within the ES with paragraphs 16.157 and 16.161 stating the residual impact is expected to be 'no impact'. The mitigation proposed in table 16.16 for sunlight and overshadowing includes: Reduce

massing at the southern end of each plot; increase size of proposed windows, in particular those facing south; locate non-habitable rooms where sunlight levels are low; reduce massing of adjacent blocks; ensure amenity spaces are located within 30 degrees of due south; redefine size of amenity spaces to reduce overshadowing.

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

Daylight

- 16.30 As set out in the Daylight/Sunlight assessment the BRE guidelines use the average daylight factor calculation (ADF). The ADF is a measure of internal daylight indicating the ratio of inside illuminance to the outside illuminance expressed as a percentage. The BRE states that daylighting in new rooms can be determined using average daylight factor (ADF) calculations. BS8206-2 Code of Practice for Daylighting recommends different average daylight factors for different habitable spaces; as follows: 1% for bedrooms; 1.5% for living rooms and 2% for kitchens. A value of 1.5% is accepted for open plan spaces such as kitchen/living/dining (KLD) rooms.
- 16.31 The results of the testing are set out in detail in the DSO report. This shows that of the 140 windows tested (45 KLD and 95 bedrooms) only 4 KLDs and 2 bedrooms failed to meet the BRE standards.
- 16.32 Of the 4 KLD spaces there were 3 which were achieving an ADF of 1.5%, which is considered to be a reasonable target for such spaces. This is further corroborated by a recent note by the GLA on daylight which outlined that a 1.5% target for a kitchen/living/dining room can be considered acceptable. The remaining KLD was found to achieve an ADF of 1.4%, this is primarily due to the glazing being situated under a recessed balcony which will have a significant impact on the window's exposure to daylight. Another factor is that the ADF calculation is heavily weighted by the room area, which in this instance is problematic as the KLD in question also acts as an entryway and

hallway to the unit. As it is on the ground floor and adjacent to the undercroft carpark the ground floor element of this unit cannot be dual-aspect. The glazing along the available façade for this unit has been maximised and the failure is only marginally below the 1.5% guideline. On balance, this is therefore considered acceptable.

- 16.33 The remaining rooms not meeting the BRE criteria are 2 bedrooms in one of the shared ownership units on the southern end of the proposed building in Core C. They are also situated underneath a recessed balcony, which is required to provide private amenity space to flats above. These do present a somewhat substantial failure achieving 0.55% and 0.69% against the required 1%. The applicant has further advised however that they have sought to prioritise the KLD as the primary habitable space and are restricted due to the balcony arrangements. Given that only a small number of rooms are affected, the proposed is considered acceptable in this instance.

Sunlight

- 16.34 The term 'annual probable sunlight hours' refers to the long-term average of the total of hours during a year in which direct sunlight reaches the unobstructed ground and a dwelling will appear reasonably sunlit provided: at least one main window faces within 90 degrees due south and the centre of at least one window to a main living room can receive 25% of annual probable sunlight hours (APSH), including at least 5% of annual probable sunlight hours in the winter months (WPSH) between 21 September and 21 March.
- 16.35 A sunlight access assessment has been carried out on the south facing living rooms in the proposal as per the BRE guidelines. This equated to 31 living rooms. Of these 21 living rooms have at least one south facing window achieving both the annual sunlight hours and the winter targets. Of the remaining, 4 met the annual sunlight hours but not the winter targets and 3 achieve the winter targets but not the annual sunlight hours. There are 3 units which fail to meet either the annual or winter probable sunlight hours. Of those that fail, the applicant has advised that this is due to overhanging balconies from the floor above. The report states that proposed design has maximised accessibility to sunlight in living spaces considering the context and limitations of the site. It is also noted that only a small number of windows are affected.
- 16.36 There is one window that receives 0 APSH/WPSH however this window serves a hallway area and other windows serving the space comply with the BRE criteria. On balance, this is therefore considered acceptable.

Overshadowing

- 16.37 The BRE states that for an amenity space to appear adequately sunlit throughout the year, at least half of the area should receive at least two hours of sunlight on 21 March.
- 16.38 There are three open spaces proposed as part of the development for residents that were tested. The results show that of the 3 amenity areas assessed, 2 achieve greater than 2 hours of sunlight on the 21st March on over 50% of their area. These are the two roof terrace spaces. The central podium space however does not achieve 50% and instead 36% of the area will receive 2 hours of sunlight. This does represent an uplift from the outline massing however in which 0% of the area would have achieved 2 hours of sunlight. As such no objection is raised. There are two additional roof terrace spaces proposed with resident access, if calculating the percentage of sunlight to the spaces as a whole, 56% of communal amenity spaces achieve 2 hours of sunlight.
- 16.39 The daylight results presented in the report where relative VSCs are all equal to 1.0 or above indicating that the proposed does not negatively impact the neighbouring properties.
- 16.40 With regards to overshadowing of Southern Park as an amenity space, this has been clearly addressed on Page 24 of the DSO report, showing that 100% of the space will receive >2 hours of sunlight on 21 March, which significantly exceeds the 50% area recommended by the BRE.

Privacy / Overlooking

- 16.41 Guidance suggests a distance of 18-21m. The Housing SPG notes that whilst this may be a useful 'yardstick' it should not be applied rigidly as it can "limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density".
- 16.42 Standard 28 of the Major's Housing SPG requires design proposal to demonstrate how habitable rooms provide adequate privacy from neighbouring properties, the street and public spaces. The SPG further states in the supporting text that rigidly applying the 18-21m separation distance can limit the variety of urban spaces, although noting that this is a useful yardstick and a reduction against this separation distance must be carefully considered (in terms of placement of windows, habitable/non-habitable room configuration etc.). The proposed has a minimum separation distance of 12.9m. Whilst this is below the separation distance recommended as a guide

within the SPG, the block arrangement is consistent with that consented under the outline consent.

- 16.43 Additionally, the applicant has advised that they have sought to maintain privacy for future residents by designing the layout of apartments to avoid direct overlooking; by prioritising inset balconies, considering the location of habitable and non-habitable spaces to reduce overlooking of habitable to habitable rooms, angling windows as necessary to reduce direct overlooking and including defensible space for ground floor and podium level units.
- 16.44 The apartment block has balconies/terraces on all elevations, although not possible in all locations, these are spaced across the elevations to avoid being in close proximity to another balcony where possible.
- 16.45 In regard to the distance from the proposed site to the nearest point, the proposal is 22m from Plot 101 apartments and 31m from the townhouses, 27.5m from Plot 203 and 29.8 from Plot 201. The proposed is well within the SPG's guidelines. Notwithstanding this, the proposal occupies the same footprint as consented by the Outline planning permission and therefore the location of the plots in relation to one another has been accepted.
- 16.46 Overall it is not considered that the proposed gives rise to a loss of amenity from overlooking and the proposal is consistent with the consented massing.

Private amenity space

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

17.0 Landscaping / Public Amenity Space / Communal Space

- 17.1 Policy OS4 of the Core Strategy requires that new development enhances Royal Greenwich's rich biodiversity and geo-diversity. Policy OS(f) expands on the aspects that must be taken into account when assessing ecological factors.

- 17.2 Policy 5.10 of the London Plan requires development integrate green infrastructure to be incorporated in the design process to contribute to the Mayor's aim for 'urban greening'. Policy 7.19 requires a 'proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy' the policy goes on to list the considerations for planning decisions to achieve this strategic aim.
- 17.3 Policy E(f) of the Core Strategy and Policy 5.11 of the London Plan provide additional detail in terms of requirements for living walls/roofs.
- 17.4 An Arboriculture Report has been submitted in support of this application. The report assesses the impact of the proposal on the existing landscaping. The Arboricultural Impact Assessment identifies that within the application site there are two groups of trees that need to be removed to facilitate the development these include Willow, Raywood Ash and, Hornbeam (total 51 trees). One group of trees has already been removed, including Raywood Ash, Oak and Hornbeam (24 trees in cluster). A further group of trees are due to be removed (35 trees in the cluster). All of the above are identified in the report as BS Category B2, which is described, as 'Trees of moderate quality and value: those in such a condition to make a significant contribution'.
- 17.5 The arboriculture report cites that trees that have already been removed were removed due to development pressure with the applicant noting the trees sit within the location of the haul road. The additional cluster which are due to be removed sits within the future location of the proposed ecoswale. The ecoswale is an integral part of the masterplan that has been within the design strategy since the 2011 outline planning application. The purpose of the swale is for both ecological enhancements and drainage. fairly significant changes in ground levels and extensive ground works are required to create the swale meaning some or all the trees within the area of the swale will need to be removed as a result of the impact of the ground level changes. The trees that have already been removed are also in the future site of the ecoswale, meaning that would have needed to have been removed had they not been removed at this stage.
- 17.6 Of the 58 trees, fourteen varying types are proposed within the application site. Details of the tree types and locations can be found in the landscaping report produced by Turkington Martin. 28 new trees shall be planted within the swale which are of greater size and maturity than many of those being removed as well as 14 trees in the square and 16 trees on the podium so there is a net gain of 23 trees across the application site.

- 17.7 The report suggests a condition be imposed to secure on-going protection of trees during the construction works and to ensure the future landscaping proposals take account of these trees. It is recommended that this be imposed should members be minded to permit the application.
- 17.8 A public play area is proposed within the communal square along with some benches for sitting. The square will also benefit from tree planting to line the edge between the play area and the adjacent block (Plot 203). There will also be an area for café tables and further play area adjacent to the swale. A pedestrian link will be located to cross the Swale and create a direct path to the park.
- 17.9 At the centre of the building will be a communal podium space accessible to all residents. The podium is the location of some private amenity space in the form of balconies and will be protected by defensible space. The podium also includes a modest provision of play space; this is discussed further below.
- 17.10 Hard landscaping will be a combination of block paving with granite aggregate, concrete block paving to footpaths on Rennie Street and pedestrian areas, concrete paving slabs to podium patios and resin bound gravel. Further details of this can be found in the Landscape Statement with example images and details of the locations of each material type to be used across Plot 202.
- 17.11 The 2012 ES requires an improvement to the sunlight/daylight into amenity spaces. The communal terrace does not achieve the BRE requirement of 50% of the space receiving 2 hours of sunlight in March as the 2 hours is achieved for 36% of the space proposed. The applicant has advised that this is an improvement against the outline massing which resulted in 0% of the space achieving this BRE requirement. It also noted that the podium at Plot 301 which recently received RMA approval has 13% of the podium area receiving 2 hours of sunlight on 21 March, which is notably less than the 36% received by the podium at 202. There are an additional two amenity spaces provided for residents, each of which achieves the 50% requirement. The applicant further notes that the podium is not considered to be the primary amenity space for the residents of Plot 202 as they will have full access to individual private balconies/amenity areas, roof terraces at 202 (both of which will have over 80% of the area meeting the 2 hour sunlight target on 21 March), as well as to Southern Park which is located immediately to the west of Plot 202, with good sunlight access year-round.
- 17.12 The podium delivers flexible amenity spaces and continuous seating walls located throughout the podium landscape to allow varied use of the space for

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

- 17.13 All units that sit flush with the podium will have direct access onto this space and defensible space is provided to retain privacy.
- 17.14 In addition to the podium amenity space, communal amenity space is proposed in two locations on the sixth floor as roof terraces. Both spaces propose seating area only set within bio-diverse planting intended to provide small areas of social space for residents. Residents therefore will have access to both an area of quiet enjoyment on the sixth floor and a more active area at podium level, which includes play provision. All tenants have access to the Podium amenity space; meaning the space is accessible to all tenure types. The tenants of Core A have access to the west communal terrace located on level 06 and the tenants of Cores B / C have access to the south communal terrace on level 06. The tenants of the 3 storeys houses have access, as previously mentioned, to the Podium amenity space, and will have access to the south communal terrace on level 06 through Core C.
- 17.15 On the basis of the above, it is considered that the landscaping, public open space and communal open space is acceptable in the context of the outline planning permission.

18.0 Child Play space

- 18.1 Policy 3.6 of the London Plan requires development to include provision for play and informal recreation based on expected child yield to ensure as safe and stimulating play facilities are essential for a child's wellbeing, health and future development. The requirements for this are further elaborated on within the Mayor's Play and Informal Recreation SPG. Core Strategy Policy H(e) states that in residential developments that include over 50 units of family housing, suitably equipped and well-designed children's play areas are required for different age groups.
- 18.2 The proposed includes a communal terrace for residents of the block to access at first floor. This includes an area of dedicated play. The proposed also includes play provision in the public square and adjacent to the proposed café.

- 18.3 The requirements for play space and informal recreation were established at outline stage. Parameter Plan 2368-MP-015 Rev 02 shows the landscape and public realm plan that was consented as part of the masterplan, which the reserved matters application must adhere to. This was based on policy framework relevant at the time. Based on the GLA's Play Space Calculator (2019) the development creates a requirement for 496 m² based on a child yield of 49.
- 18.4 The dedicated play space for residents of Plot 202 only (podium) measures 145 sq. m. The play area located in the public square measures 214 sqm and the space adjacent to the café measures 75 sqm. Both spaces are available to the public.
- 18.5 The play area includes stone seats, timber animals and seesaws and play rubber safety surface. The play space within the public square will include a cast stone play animal and outdoor pebble seating. Porcelain tile paving is proposed as the paving material. The applicant was previously proposing rubber play surfacing and timber play equipment but following fire safety advice has had to amend the proposal as this area forms part of an escape route. The proposal is considered to provide limited play opportunities and it is considered that further exploration of this should be undertaken, noting that the scheme must comply with fire safety requirements and that the optimal scheme has been delivered. As such, it is recommended that a condition be imposed stating that additional details should be provided by way of condition and that the details provided at this stage have been considered as background information only.
- 18.6 The applicant has sought to improve the play equipment in the public realm which includes a range of play provision including: timber tower, timber multi-play equipment for climbing, swinging and balancing aimed at children aged 5-11, timber multi-play equipment for aimed at children aged 0-5, small trampolines, play/seating boulders, memory game for young children, marbles table, telescope, impulse spheres play structure, tubular chimes and pebble seats. The applicant has advised that the public play space is not part of an escape route and therefore can include timber play equipment and rubber surfacing. The public play equipment is considered to be quite extensive and of high quality. Additional images of the type of equipment proposed is included an addendum document. The finalised details are required to be submitted and approved by the Local Planning Authority under condition 16 of the outline consent.
- 18.7 The nursery also has a private open space measuring 101 sqm. This is located within the centre of the block, sitting flush with the communal podium area.

An escape route is proposed from the amenity space of the nursery onto the Podium, a condition will be imposed stating that this is an emergency access route only and the nursery shall not be permitted to use the podium space for play.

19.0 Biodiversity

- 19.1 Paragraph 8(c) of the NPPF sets out the environmental objective of the Framework in terms of achieving sustainable development and includes 'helping to improve biodiversity',
- 19.2 Paragraph 170 of the NPPF, states that the planning system should contribute to and enhance the natural and local environment and lists several ways this should be done. These include minimising impacts on biodiversity and providing net gains in biodiversity where possible
- 19.3 Paragraph 175 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying several principles which the paragraph goes on to list.
- 19.4 Paragraph 180(c) states that planning decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 19.5 Policy 7.19 of the London Plan (Biodiversity and access to nature) states that wherever possible, development should make a positive contribution to the protection, enhancement, creation and management of biodiversity
- 19.6 Policy DHI of the Core Strategy states that all developments are expected to enhance biodiversity consistent with the Greenwich Biodiversity Action Plan.
- 19.7 Policy OS4 of the Core Strategy states that the Royal Greenwich's rich biodiversity and geodiversity will be protected, restored and enhanced.
- 19.8 Policy OS(f) states that development proposals will be expected to take account of ecological factors, paying attention to the need for: Consideration of the biodiversity and geological features of the site and the surrounding area, including protected species (Refer to Policy OS4). These features should be respected, and the area's natural character enhanced. An appropriate level of surveying is required to enable decisions to be made about the existing trees on the site and to ensure that landscaping schemes include environmentally appropriate planting using locally native species and demonstrate appropriate irrigation plans for landscaping.

- 19.9 The supporting text for Policy OS(f) further states that where development is proposed on sites adjacent to protected SINCS, applicants must demonstrate that habitats will not be adversely affected.
- 19.10 The proposal includes half of the eco-swale that shall be located adjacent to Southern Park.
- 19.11 The eco-swale is described as making an important contribution to site-wide bio- diversity, forming part of a green spine which effectively extends the qualities of the existing ecology park into the development and Southern Park. The eco-swale also forms a part of the site-wide sustainable drainage (SUDS) strategy, accommodating surface water run-off from areas of hard landscape and the roofs of adjacent buildings.
- 19.12 Some areas of the swale shall allow for public access to allow for the swale to become part of the amenity provision for the site; however, a section shall also be fenced to restrict access to help allow the more rapid development of habitats and increase the biodiversity value of the swale.
- 19.13 It is explained in the landscaping statement that the land owners of the Ecology Park, The Land Trust (LT) intend to take over the long-term maintenance of the swale and have further visions as to how the swale can be developed. This is not set out in this proposal however and a more limited version of the swale is presented.
- 19.14 The swale is designed as a shallow valley with the base consisting of a shingle channel and reed bed. Along the channel are lower areas where surface water is retained, and which are intended to support wetland planting. Surface water run-off from adjacent areas and the buildings is specifically channelled towards these areas. The type of planting to be located in the swale proposed as part of this application includes meadow, woodland edge planting, shrub planting, and areas with reed beds. Full details of the planting and the management of the swale are required by conditions attached to the outline planning permission.
- 19.15 The application also proposes an area for rain garden planting to be located to the west of the public square in front of the café. The rain garden collects and retains water runoff and feature trees and plants able to accommodate drought and water inundation conditions.
- 19.16 Bat, bird and black redstart boxes are proposed as part of the development.

- 19.17 The proposal also includes a mix of both green and brown biodiverse roofs. The applicant has advised that these have been maximised and a balance has been struck between the provision of biodiverse roofs and the provision of PV panels. Whilst some of the roof space can contain both PV panels and biodiverse roofs, this reduces the number of PVs, as certain distances need to be achieved between the panels for sunlight and rain to allow the biodiverse roof to survive. In order to achieve the overall numbers required for Plot 202/Parcel 2, the applicant has advised that they have had to position the panels more densely in some areas, which does not allow for the integration of a biodiversity roof. However, they have managed to combine both PVs and biodiverse roofs in other areas to maximise delivery of brown roofs on the scheme. Additionally, there are also areas of biodiverse roofs which are not covered by PVs to create a range of spaces on top of the roof to allow the creation of different habitats. Full details of the landscaping and the management of these spaces are required through conditions attached to the outline planning consent.
- 19.18 The ecological assessment report of overshadowing of the Ecology Park confirms that no area within the Ecology Park would be overshadowed by Block 202 in June and only a small area in March, as well as the consented and further mitigation; the residual effect of Block 202 is considered not significant at the Local Level.
- 19.19 The application is being independently assessed to determine whether the impact and proposed mitigation is acceptable. The independent assessor has raised a number of queries which the applicant has responded to. A copy of the queries and responses is included as an addendum to this report. The assessor has advised that the finalised species mix needs to be fully considered to include additional native species. This can be addressed by way of condition. It is recommended that a condition be imposed on the reserved matters application noting that the finalised species of plants shall be submitted and approved prior to occupation.

20.0 Sustainability and Energy

- 20.1 The NPPF supports proposals for improvements to environmental sustainability. Paragraph 11 placing sustainability at the heart of the NPPF, with the presumption in favour of sustainable development. As noted in paragraph 8, sustainability is considered to be three dimensional; environmental sustainability forming one part of this along with economic and social sustainability.

- 20.2 Chapter 14 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) elaborates on this. Paragraph 148 requires planning authorities to plan for new development in locations and ways which reduce greenhouse gas emissions.
- 20.3 The London Plan is consistent with the aims of the NPPF, with Policy 5.1 setting out the strategic overview for London stating that “the Mayor seeks to achieve an overall reduction in London’s carbon dioxide emissions by 60 per cent (below 1990 levels) by 2025”. Policy 5.2 goes on to set out how planning decisions should be made to ensure carbon dioxide emissions are minimised; requiring that development “make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy: be lean (use less energy); be clean (supply energy efficiently) and be green (use renewable energy)”.
- 20.4 Chapter 4.6 of the Core Strategy is also consistent with the aims of the NPPF and discusses Environment and Climate Change. Policy EI “supporting the incorporation of renewable energy generation within development proposals (Be Green)”.
- 20.5 A condition was attached to the outline application requiring that the renewable energy technologies on site shall provide no less than 18.5% on-site CO₂ reduction and details of the renewable energy technologies shall be provided to the Local Planning Authority prior to the implementation of the development (condition 64). The condition was amended under the 2019 S73 to further state that reasonable endeavours to achieve zero carbon standard on site should be taken through implementation of high efficiency systems (e.g. state of the art PV panel models) and innovative technologies in the interest of maximising on-site CO₂ reductions, to be evidenced with each subsequent reserved matters application.
- 20.6 The energy assessment for the site has been carried out using the London Plan’s energy hierarchy; Be Lean, Be Clean, Be Green. The applicant is proposing a CO₂ reduction of 19.0% from renewables compared to the Be Clean stage and a 59.1% reduction against Building Regulations Part L 2013 compliant baseline to be achieved.
- 20.7 Be Lean (energy efficiency/building fabric) measures are set to achieve a 6.2% reduction. This is achieved by enhanced fabric efficiency of the building envelope; air tightness better than Part L 2013 standards; reducing the need for artificial light; high efficiency lighting systems; Mechanical Ventilation Heat Recovery for dwellings and non-residential units; air source heat pumps and monitoring (e.g. smart meters). As part of this step the Cooling Hierarchy

(see London Plan Policy 5.9) is implemented and measures are proposed to reduce the demand for active cooling.

- 20.8 Under Be Clean, the development is proposing to connect to the GMV district heating network with CHPs (Combined Heat and Power) and centralised boilers. The main energy centre for this district heat network is located at Plot 504. Plot 504 is due to be completed and operational shortly. There is a temporary energy centre in Parcel 1 currently serving the site. By means of connection to the site wide heat network, regulated CO2 emissions will be reduced by 43.3% under Be Clean.
- 20.9 Under Be Green, the applicant is proposing the solar panels (PVs) and air source heat pumps (ASHP). The ASHPs serve the non-residential units. The PV panels shall be connected to the landlord areas of the development (such as corridors or entrance lobbies). The proposal includes a minimum of 115 panels. The PV panels and the ASHPs will reduce CO2 emissions on site by 9.6%.
- 20.10 Whilst the above complies with condition 64 in the sense that it delivers above the 18.5% CO2 reduction as per the Outline Energy Statement, calculated in relation to Be Clean (equivalent of 11% in terms of current GLA guidance) the condition was amended in 2019 to require that reasonable endeavours are employed to achieve zero carbon standard on site through implementation of high efficiency systems (e.g. state of the art PV panel models) and innovative technologies in the interest of maximising on-site CO2 reductions, to be evidenced with each subsequent reserved matters application. The applicant has provided additional details to demonstrate how they have sought to maximise carbon reduction measures as part of the development and that in this instance no further reductions have been possible.
- 20.11 The original outline planning permission did not include the requirement for a carbon off-set payment to be required in the S106 as it was not a policy requirement at that time. Given the policy changes, this was included in the 2019 amendment to the legal agreement. Given the viability constraints of the development, this shall be triggered should the viability assessment submitted at reserved matters stage show a surplus beyond the minimum 20% affordable housing provision to ensure this obligation is unaffected. The applicant has provided an addendum to the Energy Strategy which shows that following the savings on site detailed above there is a remaining 61.6 tonnes of CO2 per year, equivalent to 1,848 tonnes over 30 years, which would be required to be offset through carbon offset contributions. This would be the equivalent of a financial contribution of £110,880.00. The viability assessment

however does not identify a surplus and therefore this requirement is not triggered.

- 20.12 According to the Sustainability statement, dwellings will aim to meet a water consumption target less than or equal to 105 litres/person/day, in line with Policy 5.15 of the London Plan (Housing Standards Minor Alterations 2016). Details of this are to be provided in accordance with condition 63 of 19/1545/MA.
- 20.13 The applicant has advised that at this stage the development is expected to achieve Code for Sustainable Homes Level 4. The applicant has provided a pre-assessment with the application to support this position.
- 20.14 The outline consent requires the developer to build all non-residential space to a minimum of BREEAM Outstanding. The applicant has however advised that the spaces will not comply with this requirement and will instead comply with BREEAM 'Excellent'. The applicant would need to formally apply to amend the condition to allow this rating to be changed. As such, whilst the comments in the Energy Strategy are noted, the applicant must still comply with the requirements of the condition at submission of detail stage.

21.0 Impact on Transport and Infrastructure

- 21.1 Policy 6.3 of the London Plan requires a full assessment of a proposals impact on the transport network; requiring that development does not adversely impact on safety. Policy IM(b) of the Core Strategy and Policies 6.9 and 6.10 of the London Plan set out the consideration for walking and cycling in new development and Policy IM(c) of the Core Strategy and Policy 6.13 of the London Plan set out the requirements for parking provision. Policy 6.13 of the London Plan requires that proposals include provision for the needs of businesses for delivery and servicing. Policy 6.13 sets out the requirements for parking in London. The policy is supported by Table 6.2 which sets out the maximum standards taking account of density and PTAL rating.
- 21.2 As noted, the outline consent included a general overview of the parking strategy (Drawing Number: 2368-MP-014 Rev P02). Due to land contamination issues, there is no ability for basement parking to be provided in GMV.
- 21.3 23 parking spaces are proposed in total within the redline boundary, all of which are proposed as under croft spaces within the development block. This creates a ratio of 0.21:1 cars to residential units. The 2019 S73 reduced the parking provision required site wide to a ratio of 0.34:1 car parking spaces to

residential units, down from 0.45:1. The proposed parking conforms to the general principles of the outline consent and parameter plans as earlier phases have overprovided in regard to parking bays and thus the 21% provision is acceptable. The applicant will need to comply with the 0.34:1 site wide.

- 21.4 Car parking spaces are sold to residents as a right to park rather than allocated a space directly.
- 21.5 SI06 Appendix 7 paragraph 2 states: Of the total car parking spaces for the Development (34% of Dwellings) 10% will be disabled spaces and will be allocated to persons with a valid disability permit. A total of 2 wheelchair spaces are proposed which complies with this requirement.
- 21.6 20% of all bays will require active and 20% require have passive electric vehicle charging spaces. This equates to 5 active and 5 passive spaces.
- 21.7 Policy 6.9 of the London Plan requires that developments provide 'secure, integrated, convenient and accessible cycle parking facilities' in accordance with Table 6.3. Table 6.3 requires 1 space per studio/1 bed and 2 spaces for all other unit size. The provision of cycle parking spaces across the masterplan was increased to be in line with draft London Plan standards under the 2019 S73 (Condition 31). This requires 1 space per studio; 1.5 spaces per one-bedroom unit; 2 spaces for all other dwellings; and 1 space per 40 units. The proposed includes no studios, 17 one beds and the remaining 105 units being 2bed+ creating a requirement for 236 spaces for the residential dwellings and 3 short stay spaces. The nursery and café generate a requirement for 14 spaces (12 for the nursery and 2 for the café) based on London Plan 6.9, table 6.3. The proposal includes provision for 244 cycle spaces for the residential units and a further 34 for visitors. The proposal also provides 4 dedicated spaces for the nursery and 4 dedicated spaces for the café. The visitor's spaces also serve the Community Centre proposed in Plot 203 for which an application has been submitted and is currently being considered (planning reference: 19/4008/R). This generates a requirement for 7 spaces. As such, the proposed is over providing on cycle parking spaces and although dedicated cycle parking is not provided for the totality of the requirements for the nursery and the café, this is considered acceptable in this instance due to the overprovision.
- 21.8 The cycle parking spaces are all located securely and conveniently within each plot in accordance with policy 6.9.
- 21.1 Policy 6.10 of the London Plan places great emphasis on the aim to increase walking in London. To achieve this, the policy requires decision makers take

account of the quality of the pedestrian environment, taking account of Transport for London's Pedestrian Design Guide. Policy IM(b) includes a requirement for promoting safety to pedestrians and cyclists. No roads are proposed as part of this application as the roads servicing this plot have already been consented under separate applications with part now being constructed. Well landscaped routes are created on the borders of the application site. A pedestrian and cycle routes is to be created adjacent to Southern Park and an access link is to be created from the masterplan across the swale to the Park. Further detail of materials and landscaping will be provided by condition.

- 21.2 The Aerodrome Safeguarding Map shown in Figure 8 of Policy IM(d) indicates the outer safeguarding boundary for the airport, in terms of proposed building heights that must be referred to the Civil Aviation Authority. The proposal falls within the area for which development over 15 meters must be referred to London City Airport. London City Airport have raised no objection to the application subject to the inclusion of conditions, these will be imposed on the consent should permission be granted.

22.0 Air Quality

- 22.1 Air Quality was fully considered with the outline planning permission as part of the Environmental Statement. The proposed is consistent with the outline consent, with only minor variations.
- 22.2 The reserved matters application is supported by a letter from Rambol (dated 06.08.2019) that finds that there are no new environmental impacts or effects that would arise over and above those previously assessed in the 2011 Environmental Statement.

23.0 Waste

- 23.1 Policy 5.17 of the London Plan seeks to minimise waste and 'achieve high reuse and recycling performance' and requires suitable waste and recycling storage on all new developments.
- 23.2 The proposed includes details of the refuse storage and collection to be provided for future residents. The café and the townhouses will have space internal to those units for refuse, this is highlighted in the Design and Access Statement. Two refuse storage areas are provided for the apartment units and the nursery. Access to the refuse stores will be from Rennie Street or via the car parks internally. One refuse store will serve 65 properties and includes provision for 21 mixed dry recycling, residual waste and organic

recycling bins. The other refuse store serves 52 units and includes provision for 17 mixed dry recycling, residual waste and organic recycling bins. A total of 3 bins are provided for the nursery for mixed dry recycling, residual waste and organic recycling. The provision for the café at this stage is noted as indicative as the requirements will be based on the needs of an end user. As such, a condition shall be imposed that details shall be provided prior to the occupation of that use. The bulk storage areas in the refuse stores of Plot 202 will be separated from the general waste and recycling bins.

- 23.3 It should also be noted that the outline consent is subject to a condition requiring further information to be submitted. The strategy proposed as part of this application is considered acceptable with further detail due under the submission of conditions and the café provision to be subject to an additional condition attached to the reserved matters consent. The information has been reviewed by the Waste Service team and has been found to be acceptable.
- 23.4 As such, it is considered that waste strategy for Plot 202 is acceptable.

24.0 Areas of High Archaeological Potential (AHAPs)

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

25.0 Flood Risk

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

25.2 The site is not designated as an area at risk of flooding on the Core Strategies Policies Map and is therefore considered to be acceptable.

26.0 Legal Agreement

26.1 The application is a reserved matters application and therefore the proposed development has already been the subject of a legal agreement in terms of the Outline Planning Permission.

26.2 The S106 Agreement dated 30th March 2012 for the Outline Planning Permission (Ref 12/0022/O) secured the following obligations:

- provision of 20% affordable housing across the outline scheme with a 70:30 split in favour of affordable rental units;
- a review of the affordable housing provision with each submission of a reserved matters application;
- financial contributions towards bus improvements, cycle parking at North Greenwich Station, upgrades to the Riverside Walk, under five childcare provision, the Cultural Strategy, Public Art, off-site Community facilities, Social Services, increased provision of primary school places, improvements to secondary school education, health facilities, environmental monitoring, public realm and open space, GLLaB, emergency services and public safety improvements;
- carrying out of highways works;
- submission of a travel plan and car park management plan;
- provision of a car club and assistance with membership fees;
- provision of an on-site children's centre/under 5's nursery;
- amendments to the CPZ to prevent parking permits being issued for residents;
- provision of cycle routes, provision of a community building; implementation of a Low Emission Transport Strategy;
- provision of open space;
- provision of play areas;
- participation with GLLaB; and
- provision of affordable business space and implementation of development management arrangements

26.3 A Section 73 to the outline planning permission (19/1545/MA) was recently granted. This secured the following amendments:

- Definition of planning and commercial building to be added/amended
- Viability late stage reviews to be added
- Trigger on community facility to be updated

- Trigger on education facility to be updated
- Trigger on open space to be updated
- Trigger on MUGA to be updated
- Reduction of Car Parking provision to be reflected in s106 clauses
- Trigger to be imposed on provision of non-residential floor space

27.0 Community Infrastructure Levy (CIL)

27.1 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1st April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £35 per square metre.

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

28.0 Implications for Disadvantaged Groups

28.1 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.

28.2 Access to and within the development for persons with physical disabilities will be improved.

28.3 The proposal will provide new job opportunities in the construction phase.

28.4 The application will provide affordable housing on the site.

28.5 All new housing will be constructed to Lifetime Homes standard.

28.6 10% of the new housing will be designed either to full wheelchair standards or to be easily adaptable to wheelchair standard housing.

29.0 Conclusion

29.1 The proposal is considered acceptable in principle and is in substantial accordance with the outline consent.

- 29.2 The density and unit mix, is found to be in accordance with the requirements of the outline consent and relevant policy requirements. The application is supported by a viability assessment, which has been considered by an Independent Viability Assessor. The report finds the scheme would be unviable with an additional obligation for affordable housing provision.
- 29.3 The nursery and café space comply with the requirements of the masterplan and deliver positive facilities for the community.
- 29.4 Overall, no concerns are raised regarding the parking provision and impact on highways as the proposed is in accordance with the outline parameters. This is also the case for the cycle parking provision which has been proposed in accordance with Condition 31.
- 29.5 The proposal is considered to be well designed and in accordance with the wider site aspirations. There is sufficient variation from the previously consented elements of the scheme, whilst being in substantial accordance to encourage a sense of continuity and site character.
- 29.6 The quality of the accommodation has been considered. The proposal is in accordance with the various requirements (Greenwich Wheelchair Site Brief, lifetime homes, building regulations Part L, and Mayor's Housing SPG 2016). Each unit has private amenity space in the form of courtyard gardens, private rear garden space, balconies and/or terraces.
- 29.7 Amenity of future residents and surrounding properties has been considered and it is concluded that amenity is safeguarded in respect of noise, overlooking, and overshadowing.
- 29.8 The impact on biodiversity has been considered by an independent assessor.
- 29.9 The play space provision is sufficient to serve the requirements of the residents so far. Full details shall be provided by condition and further exploration of opportunities for enhancing the podium play shall be provided by condition.
- 29.10 In conclusion it is considered that the proposed is in accordance with the parameters or the outline planning permission as well as local, regional and national planning policy. It is recommended that the reserved matters application be approved, subject to conditions.

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