

<b>Planning Board</b>	<b>Agenda Item: 5</b>
<b>16 February 2021</b>	<b>Reference Nos: 19/1920/F</b>

**Applicant:** Greenside Services Limited

**Agent:** GA&A Design Ltd

<b>Site Address:</b> 148-156 Plumstead High Street, Plumstead, London. SE18 1JQ	<b>Ward:</b> Plumstead  <b>Application Type:</b> Full Planning
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## **I.0 Recommendation**

I.1 The Board is requested to resolve to grant conditional planning permission, as outlined below:

- Redevelopment of the rear side of the site to form 16 new-built residential units, together with the alteration of 3 of the 6 existing maisonette units.

I.2 Subject to:

- i) The conditions set out in Appendix 2 of the main report.
- ii) The prior completion of an agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) containing the planning obligations as summarised in the heads of terms set out in this report (Section 24), any addendums and the minutes of this Planning Board meeting.
- iii) To authorise the Assistant Director of Planning & Building Control to:
  - a. make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2) and its addendums, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice; and
  - b. finalise the detailed terms of the planning obligations pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), as set out in this report (Section 24) and its addendums.

- iv) In the event that the Section 106 Agreement is not completed within three (3) months of the date of this Planning Board meeting, to authorise the Assistant Director of Planning & Building Control to consider whether permission should be refused on the grounds that the proposals are unacceptable in the absence of the benefits which would have been secured, and if so, to determine the application with reasons for refusal which will include the following:

*In the absence of a legal agreement to secure Affordable Housing and financial and non-financial contributions including for Employment, Skills and Training, Highways, Energy and delivering public realm improvements, the development fails to maximise the delivery of affordable housing and fails to mitigate its impact on local services, amenities and infrastructure contrary to policies H3, IM1 and EA(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014) and the Planning obligations (s106) Guidance SPD (Adopted July 2015).*

## 2.0 **Summary**

2.1 Detailed below is a summary of the application:

<b>The Site</b>	
Site Area (m <sup>2</sup> )	1988m <sup>2</sup>
Heritage Assets	Grade II Listed Plumstead Fire Station located a short distance to the west of site.
Tree Preservation Order	No
Flood Risk Zone	Flood Zone 1

<b>Proposed Building</b>	
Building height (metres)	14.6m 16.2m including core
No. of storeys	4

<b>Housing</b>		
Density Including Existing Maisonettes	Habitable Unit/Hectare	110 hu/ha
	Habitable Rooms/Hectare	310 hr/ha
Dwelling Mix (Proposed Units Only)	Studio (no. / %)	N/A
	1-bed (no. / %)	50% (8)
	2-bed (no. / %)	25% (4)
	3-bed (no. / %)	25% (4)
	4-bed (no. / %)	0%

Affordable Housing / Tenure Split	Overall Affordable Housing (no. / %)	0%
	Social Rent (no. / %)	N/A
	Intermediate / Shared Ownership (no. / %)	N/A
	Private (no. / %)	100%
	Commuted Sum	£200,000
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Development is compliant

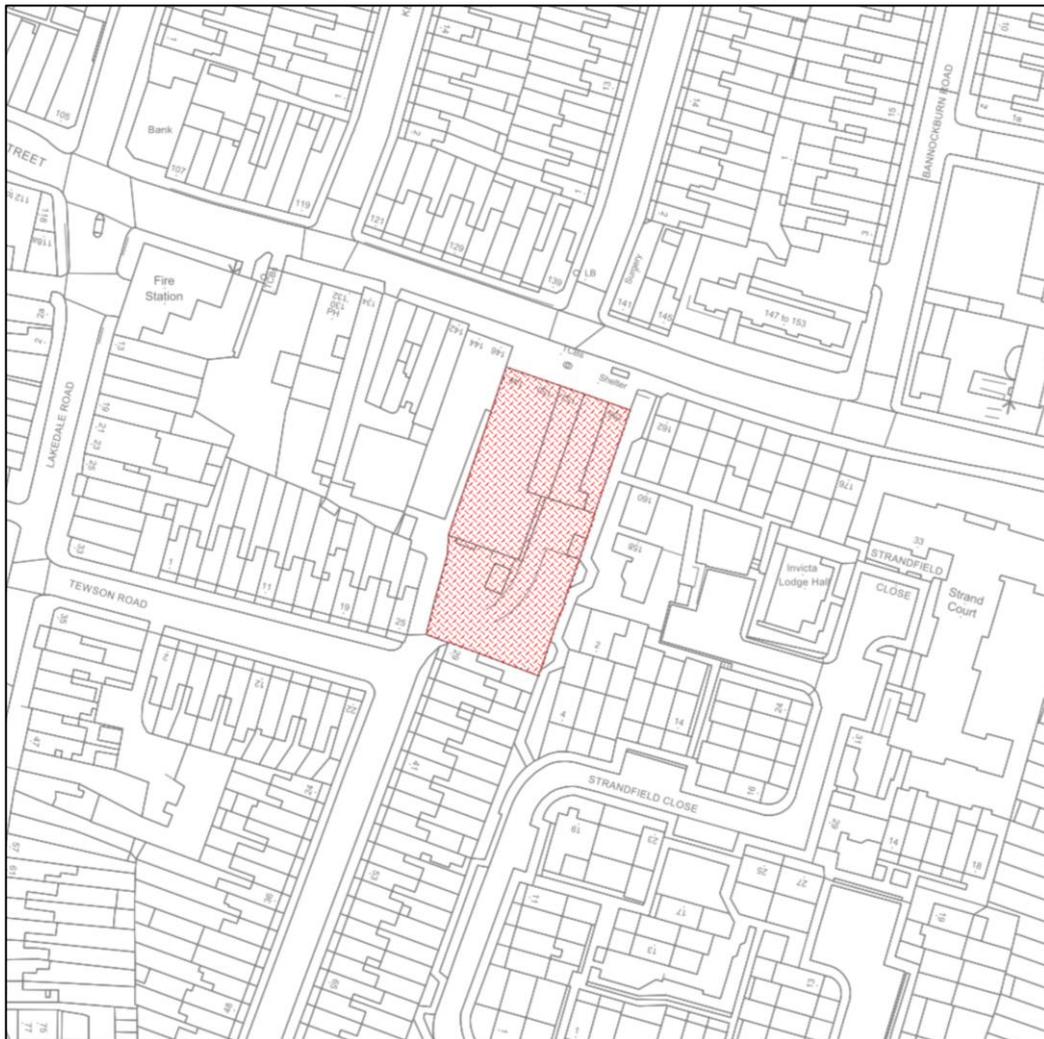
<b>Non-Residential Uses</b>		
Existing Use(s)	Existing use (Classes) / Operator	A1 & A3
	m <sup>2</sup>	1,000.62sqm
Proposed Use(s)	Proposed use(s) (Classes) / Operator	A1 & A3
	m <sup>2</sup>	590.62sqm
Employment	Existing/Proposed Number of Jobs	Unchanged

<b>Transportation</b>		
Car Parking	No. existing car parking spaces	Informal arrangement - hardstanding to the rear of the site used by some existing residents. No formal spaces.
	No. Proposed Car Parking Spaces	6 (3x Disabled)
	Proposed Parking Ratio	0.4/U
Cycle Parking	No. Proposed Cycle Parking	<ul style="list-style-type: none"> <li>• 40 Long Stay</li> <li>• 2 Short Stay</li> </ul>
	Complies with policy	Yes
Public Transport	PTAL Rating	4

<b>Public Consultation</b>	
Number in support	1
Number of objections	70
Number of comments	12
Main issues raised by objectors - These are addressed in Section 6 (Consultations) and throughout Sections 9-19 (Main Considerations).	<ul style="list-style-type: none"> <li>- Design, scale, and massing</li> <li>- Proposal represents overdevelopment.</li> <li>- Loss of privacy and increased overlooking</li> <li>- Loss of light and increased overshadowing</li> <li>- Loss of amenity</li> <li>- Insufficient child play space</li> <li>- Highways impacts</li> </ul>

- 2.2 As well as the application receiving 70 objections, the application was called in by Councillors Morrow and Cornforth if Officers were to recommend the application for approval. Councillor Morrow subsequently objected on the following grounds:
- The initially proposed affordable housing contribution of £16,000 is insufficient.
  - Concerned the proposal will not provide full access to all amenities for new and existing residents.
- 2.3 The report details all relevant national, regional, and local policy implications of the scheme, including supplementary planning guidance.
- 2.4 The application is considered acceptable and is recommended for approval, subject to the recommendation set out in section 1.1 above.

### 3.0 Site and Surroundings (in detail)



**Figure 1: Site Plan**

- 3.1 The current application relates to a three storey, mixed use building located on the southern side of Plumstead High Street. The existing building features four commercial uses at ground and first floor levels, in addition to six, two-bedroom residential maisonettes at first and second floors. The commercial uses consist of three A1 Uses and one A3 Use.
- 3.2 The existing building is primarily constructed from red brick and features flat roofs. The ground floor frontage onto Plumstead High Street features glazed shopfronts, in addition to an entrance door at the western end of the shopfront which provides primary access to the residential maisonettes. The residential entrance sees a staircase ascend to a courtyard at first floor level, from which each of the existing maisonette is accessed. The units can also be accessed through the rear of the site by a walkway/stairway, which also leads onto the first-floor courtyard. There is an existing shared vehicular access to the rear of the services and delivery yard, and this is shared between the application properties and the adjoining shops.

- 3.3 The site is located towards the eastern end of Plumstead High Street on the south side of the road and is located within the Plumstead High Street District Centre. Plumstead High Street is a busy commercial centre consisting of a wide range of shops and services, with the application building forming part of the primary shopping frontage. The majority of buildings within the high street are two to three storeys in height.
- 3.4 In addition to the commercial properties, the surrounding area also hosts a large number of residential properties, comprising of a mixture of dwellinghouses and flatted developments.
- 3.5 The site does not form part of an area of land designated in the Site Proposals Schedule (site allocation carried forward from the UDP and listed in the Addendum to the Local Plan) and is not located in a conservation area or subject to any relevant Article 4 Directions. The Grade II Listed Plumstead Fire Station is located a short distance to the west.

#### **4.0 Relevant Planning History**

- 4.1 **08/1317/F** – Construction of nine flats to the rear of the site comprising 2x 3 bed and 7x 1 bed units, provision of new plant room at second floor level, new refuse store, cycle store and car parking to rear service area. **Refused**, 25/06/2008.

##### ***Reason for Refusal 1***

*The proposed development, by reason of its excessive bulk, mass, and siting, would cause neighbouring development a loss of outlook and adverse sense of enclosure to the surrounding residents. As such, the proposal is contrary to Policies SD1, D1, SH4, H7 and H9 of the Unitary Development Plan 2006.*

##### ***Reason for Refusal 2***

*The access to the proposed residential units would be via the existing delivery and services area behind the existing shops and because of its location at the services yard, it would result in an unsafe access environment for the future occupants and contrary to Policies D1, D7, H7, H10 and M32, of the Councils Unitary Development Plan 2006.*

##### ***Reason for Refusal 3***

*The proposed units would be above the existing retail units at No 148-150 and above the existing delivery area and sub-station behind No 154- No 158, because of its close proximity to the existing delivery and commercial unit, it would result in adverse noise and disturbance to the future occupiers and contrary to Policies SE2, D1, D7, H7 and H10 of the Unitary Development Plan 2006.*

#### ***Reason for Refusal 4***

The proposed new external staircase, by reason of its position close to the existing residential accommodation at No. 148-154 Plumstead High Street, it would cause an adverse overlooking and loss of privacy to the surrounding residents and would be contrary to Policies D1, H7, H10, of the Unitary Development Plan 2006.

#### ***Reason for Refusal 5***

The proposed external staircase would connect the proposed unit to the Plumstead High Street via the existing amenity area behind No 148 Plumstead High Street, because of its position close to the amenity area at No. 148 Plumstead High Street, it would have an adverse impact on amenities enjoyed by the residents in terms of noise and disturbance and contrary to Policies D1, H7, and H10 of the Unitary Development Plan 2006.

#### ***Reason for Refusal 6***

The size of the proposed amenity space for the family units would be insufficient and the provision of balcony would create overlooking to the adjoining unit, therefore, it would create a poor living environment for the future occupiers and would be contrary to Policies D1, H7, H10, H11 of the Unitary Development Plan 2006.

#### ***Reason for Refusal 7***

The proposed development would provide insufficient parking spaces for the existing residents, it would also reduce the manoeuvrability of both private and deliveries vehicles within the application site. As such, it would be contrary to Policy M23 of the Unitary Development Plan 2006.

#### ***Reason for Refusal 8***

The proposal fails to provide disabled access for the future occupiers and would be contrary to Policies SM2 and H17 of the Unitary Development Plan 2006.

#### ***Reason for Refusal 9***

The proposal fails to provide adequate information regarding refuse provision for the existing commercial and residential units, and the proposed refuse storage for the new units' failure to provide suitable refuse facilities would have a detrimental affect on the amenities of the future occupiers and neighbouring properties, contrary to Policy H7 of the Unitary Development Plan 2006.

## **5.0 Proposal**

- 5.1 The current proposal seeks the alteration and enlargement of the existing building in order to provide 16 new residential units, which would see the existing part two/part three storey building increased to four storeys to the rear of the site. The scale and massing of the building fronting Plumstead High

Street would remain unchanged, with the main enlarged section being set back 23.5 metres from the principal elevation.

5.2 The rear of the site would be excavated and rationalised to provide ground floor level access along the whole rear elevation of the building, where presently due to land level changes, this is split over ground and first floor levels. This would also see the removal of a raised area of land to the south-eastern corner of the site, which is currently unused and overgrown. A vehicular ramp would be provided off Tewson Road and would split into two within the site, allowing for a dedicated delivery/loading bay serving the commercial units, in addition to 6 residential car parking spaces. Residential cycle and refuse stores would also be located to the rear of the site, in addition to a separate commercial bin store.

5.3 The proposed residential units will be provided in the following mix:

Unit Type	Occupancy	Quantum		Percentage	
1 bedroom	2 person	8		50%	
2 bedroom	3 person	1	4	6%	25%
	4 person	3		19%	
3 bedroom	5 person	3	4	19%	25%
	6 person	1		6%	

5.4 In addition to the proposed units, the six existing maisonettes at first and second floor levels would be retained, with three of these in the applicant's ownership also being renovated with their internal layouts altered.

5.5 Primary residential access would be retained from Plumstead High Street and would serve both existing and proposed units. At first floor level a covered hallway would connect the access stairway from Plumstead High Street with the proposed building, whilst retaining access onto the first-floor courtyard for existing maisonettes. The single storey extension would run along the site's western shared boundary with Iceland and would see the boundary wall increased in height by 0.5 metres.

5.6 Dedicated private amenity spaces would be provided for the majority of the proposed residential units, with the exception of three units at the request of Officers where unacceptable overlooking onto neighbouring properties would occur. The three maisonettes in the applicant's ownership would also be given private areas within the first-floor courtyard. This would result in a reduction in size of the existing courtyard, although 348.9sqm would be retained for communal use. The retained communal area would see improved hard and soft landscaping, together with the installation of several benches. A second communal amenity space would also be created on the roof of the

proposed extension, with all units having access to this. Final details of the landscaping would be secured by condition.

5.7 Residential access from the rear of the site would also be retained, but with the addition of an access pathway to improve pedestrian safety. A gated entry system would also be installed to improve security and tackle fly tipping issues which currently plague the site.

## 6.0 **Consultation**

6.1 Since being submitted in September 2019 the application has been subject to two public consultations, comprising of 202 individual letters sent to neighbouring properties, together with a site notice erected to the front of the site and press notice in the Greenwich Weekender. Statutory and internal bodies were also consulted, in addition to local amenity groups.

6.2 The main changes to the application since it was submitted include:

- Changes to the ground floor layout including relocation of bin and bike stores.
- Reconfiguration/removal of inappropriate balconies and reconfiguration
- Provision of screening to some balconies
- Removal of private amenity spaces for maisonettes outside application's ownership (at request of residents)
- Removal of some bench seating (at request of residents)
- Removal of recladding to the principal elevation

## 6.3 ***Statutory Consultees***

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

<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officer's comments</b>
London Fire Brigade	Pump appliance access and water supplies for the fire service were not specifically addressed in the supplied documentation; however, they do appear adequate. In other respects, this proposal should conform to the requirements of Part B5 of the current Building Regulations Approved Document B.	This a building control requirement.

Thames Water	<p><i>Waste Comments</i></p> <ul style="list-style-type: none"> <li>• We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Request relevant informative regarding groundwater discharge.</li> <li>• With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.</li> <li>• With regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</li> </ul> <p><i>Water Comments</i></p> <ul style="list-style-type: none"> <li>• On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Request relevant informative regarding water supply.</li> </ul>	Noted. Relevant informatives have been included.
Historic England	On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions.	Noted.
GLAAS	The planning application lies in an area of archaeological interest. It has long been suggested that Plumstead High Street may be on the approximate line of a Roman road.	Noted. Relevant conditions have been included.

	<p>Given the historic development of this site coupled with the nature of the archaeological potential, it is recommended that the on-going interest can be secured by condition.</p>	
Public Health	<p>Concerns regarding the lack of affordable housing within the proposed development.</p> <p>For good guidance on improving connectivity and increasing active travel, it is recommended that the applicant refers to the Mayor of London's Healthy Streets framework:  <a href="http://content.tfl.gov.uk/healthy-streets-for-london.pdf">http://content.tfl.gov.uk/healthy-streets-for-london.pdf</a></p> <p>In accordance to Policy TC(d) of the Local Plan, it is important to avoid an over concentration of A5 uses.</p> <p>It is noted that a statement of Community Involvement has been submitted. However, community engagement is still required as applicant is awaiting feedback from the local residents. The applicant is advised to actively follow up on public feedback.</p> <p>It is recommended that the applicant supports the health and wellbeing of employees through the promotion of the Mayor of London's Healthy Workplace Award to prospective businesses:  <a href="https://www.london.gov.uk/what-we-do/health/healthy-workplace-charter">https://www.london.gov.uk/what-we-do/health/healthy-workplace-charter</a></p>	<p>Affordable housing discussed in Section 12 of this report.</p> <p>Relevant informative included.</p> <p>No changes proposed to existing commercial uses.</p> <p>Proposal has been amended following receipt of comments from residents.</p> <p>Relevant informative included.</p>

	It is recommended that any businesses considered as part of the development participate in the range of Public Health initiatives such as; Breastfeeding friendly, Sugar Smart, Healthier Catering Commitment, and Dementia Friendly: <a href="http://livewellgreenwich.org.uk/help-others/get-involved/">http://livewellgreenwich.org.uk/help-others/get-involved/</a>	Relevant informative included.
Metropolitan Police	Request that the Secure by Design accreditation is conditioned should planning permission be granted.	Condition will be imposed as part of the recommendation, see Appendix 2 for the full wording.

#### 6.4 *Internal Consultees*

A summary of the consultation responses received from internal parties, along with the Officer comments are set out in table below:

<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officer's Comments</b>
Street Services	Confirm that the proposal is still satisfactory with regards to waste storage and collection.	Noted.
Environmental Protection (Contaminated Land)	No objection, subject to relevant land contamination conditions being included.	Conditions will be imposed as part of the recommendation, see Appendix 2 for the full wording.
Environmental Health	Air quality assessment is thorough in its assessment, but only deals with overall ambient pollution. Objection on the basis of poor air quality caused by odour from the commercial premises below being potentially prejudicial to health or a nuisance.	These comments are noted and discussed further in Section 20 of this report.

Highways	<p>Proposed level of car parking is acceptable and in line with London Plan Policy.</p>	<p>Noted.</p>
	<p>Access to the site is approximately 6.5m wide from an existing point on Tewson Road. The vehicle crossover also provides access for pedestrians, which could create conflict with commercial vehicles. While it is shown that sufficient room is still available for large delivery vehicles (up to 7.5 tonnes) to service the retail units on Plumstead High Street they will have little or no tolerance in manoeuvring. It will not be possible for articulated lorries to visit the rear service area.</p>	<p>Applicant acknowledged that smaller delivery vehicles would be required. A delivery and servicing plan, including details of vehicle sizes is to be conditioned.</p> <p>Pedestrian access will be retained from Plumstead High Street. The proposed pedestrian access to rear of the site represents an improvement to the existing situation, which has no dedicated pedestrian sidewalk. On balance, access arrangement considered acceptable.</p>
	<p>An overnight parking survey of local roads was carried out to determine the level of stress and found that there is opportunity for additional parking. In addition to the overnight parking survey initially carried out, a secondary survey was carried out during the day to determine the local parking demand. From both surveys it has been identified that while</p>	<p>Noted.</p>

	<p>there is considerable demand for parking in the vicinity there is however opportunity in the surrounding area to be able to accommodate additional parking demand.</p> <p>Request Financial contributions for Car Club provision, cycle training and public realm improvements.</p>	<p>Relevant contributions secured and discussed in Section 24 of this report.</p>
Occupational Therapy	<ul style="list-style-type: none"> <li>• 90% of the dwellings within this scheme should comply with the standards of Approved Document M4 category 2: accessible and adaptable dwellings.</li> <li>• 10% of the dwellings within this scheme should comply with the standards of Approved Document M4 category 3: wheelchair user dwellings.</li> <li>• Compliance with M4(2) and M4(3) should be conditioned</li> </ul>	<p>Compliance with M4(2) and M4(3) will be secured by condition (see Appendix 2 for wording).</p>
Housing	<p>Support an off-site commuted sum of £200k for the affordable housing.</p>	<p>Noted.</p>
Sustainability	<p>No objection subject to conditions and planning obligations.</p>	<p>Noted. Relevant conditions set out in Appendix 2 of this report.</p>

6.5 ***Councillors***

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

<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officer's comments</b>
Councillors Morrow and Cornforth	Have requested that this application come before Members to make a decision if planning officers are to recommend approval. No other comments or concerns were given on the application.	Noted

6.6 ***Local amenity groups***

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

<b>Details of Representation</b>	<b>Comments</b>	<b>Officer's comments</b>
Plumstead Common Environmental Group	No comments received.	N/A
Speak Out Woolwich	No comments received.	N/A

6.7 ***Local Residents***

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

<b>Summary of Comments</b>	<b>Officer's comments</b>
Negative impact on air quality.	Discussed in the section 20 of this report.
Too much housing proposed for Plumstead and Woolwich it will destroy any community spirit built up over decades.	The Borough's ten-year housing target is 28,240, one of the highest of the London Boroughs. The proposed development will contribute to the delivery of additional housing in Greenwich, assisting in meeting the borough's housing need targets.
The safety to residents and their homes should there be a fire where the fire brigade and Ambulance would be needed as	LFB have confirmed they have no objection. Ambulances would be able to access rear of the site, with access to the existing units

there is already limited access for these vehicles.	improved through provision of a lift, where presently they are accessed via a narrow walkway.
Loss of privacy and increased overlooking to neighbouring properties. Balconies and roof garden will cause additional overlooking.	Privacy issues discussed in section 16 of this report.
Loss of light to neighbouring properties.	Daylight/sunlight issues discussed in section 16 of this report.
Where the build is located on a one way system via Tewson Road and there only being one access point I feel will cause a danger with the traffic and to local residents/pedestrians.	Vehicular access to the site would remain unchanged.
Overcrowding and noise disturbance on an already very busy high street.	Proposed density is in line with the London Plan (inclusive of existing units). The site is located within a town centre location, which is considered appropriate for residential use. A Demolition/Construction Management Plan is to be secured by condition to minimise disturbances.
Generally supportive of the scheme, but no proposals given for deliveries issue. The yard is underused because it is difficult for large lorries to manoeuvre in Lakedale and Tewson Roads, resulting in deliveries to the front of shops on Plumstead High Street. This causes traffic jams to Plumstead Corner and beyond.	A delivery and serving plan is to be secured by condition.
Building is too large.	Design of proposed development discussed in section 15 of this report.
Garden on the roof effectively makes the building 4 storeys, rather than 3.	Design of proposed development discussed in section 15 of this report.

Errors in the parking survey – the Tram Yard is not accessible for public parking.	The parking survey has since been updated to remove reference to the Tram Yard.
Increase in noise due to public bench/seating in close proximity to existing residential units.	Number of fixtures has been reduced by the applicant and moved away from existing neighbouring windows. Discussed further in section 16 of this report.
No provisions made regarding private amenities, instead converting them into public amenities that will be accessible by all existing residents as well as the planned residents. Existing residents have been left with a narrow section that runs the length of the public amenity area, in order to have access and egress, and that is all.	There are no existing private amenities. The proposal originally introduced private amenity spaces for each existing residential flats, but this was rejected by residents.
Removal of the existing walkway would cause considerable inconvenience as we currently to have bins emptied at the rear of the site.	Proposal will improve refuse facilities on site. Discussed further in section 18 of this report.
Children that already live here will have a miniscule play area on a roof, which is in itself unsafe. Playspace size is also inadequate.	Final details of play space to be secured by condition. Issues discussed further in section 14 of this report.
Planting will die if not maintained.	Maintenance Plan to be required by condition.
Proposed units will overheat.	Testing of 12 representative dwellings showed that all habitable spaces tested under CIBSE TM52 criteria. Full discussion set out in Section 21 of this report.
Amenity spaces for family sized units (balconies) would be inadequate.	Units will also have access to two communal amenity spaces.
Loss of the amenity space for the 6 existing Maisonettes is not made up for by the play space on the roof.	The adjacent land is used informally by residents for amenity but is not in their ownership. Existing residents would have use of all communal amenity spaces proposed.

Bin store adjacent to 28 Tewson Road would impact their amenity.	Bin store has since been relocated away from neighbouring property.
Cladding cannot be added to the frontage of Maisonettes 4,5 & 6, as applicant does not own them.	Proposed cladding to front elevation has since been removed from the application.
Issues with the ownership certificate and notice served.	The correct notice appears to have been served. It is ultimately the applicant's responsibility to ensure this has been carried out correctly.
No space for washing lines for existing residents.	This is not a planning consideration.
Lack of secure access to rear of the site.	A secure gate and access system is to be provided to the rear of the site. Secure by Design to be conditioned.
Proposed planting will block light to existing units.	Final details of planting to be secured by condition to ensure acceptable impact.
Too much cycle parking proposed.	Cycle parking in line with Approved for Publication Draft London Plan requirements.
Development will cause access issues for existing units.	Access will be improved for existing units through provision of lift. Stairway to rear of the site to be provided in addition to existing stairs leading on to Plumstead High Street.
Rear of the existing site is an eyesore - proposal will improve this.	Noted.
Additional residential units will support an ailing end of the high street.	Noted.
Adverse sense of enclosure.	Discussed in section 16 of this report.
Proposed staircase to High Street on land not in applicant's ownership. Would impact amenity of adjacent residential unit.	Applicant has confirmed all land is in their ownership. Stairway in same location as existing and would be covered, so unlikely to impact amenity.
Staircase to rear of site would not be accessible by residents with mobility issues.	The proposed staircase to the rear is in addition to step-free lift access and was added at the request of

	residents. Existing access to residential units is only via stairs, so access arrangements would be improved.
Insufficient car parking for existing residents.	Parking survey shows capacity on surrounding roads for parking overspill.
Existing residents have prescriptive easement for parking to the rear of the site.	In order to qualify for prescriptive easement, the use must be without force, without secrecy and without permission. In this instance the land owner had given the existing residents permission to park on the land but is within their right to withdraw this permission. The Council's Legal team have confirmed this is private matter and not a planning consideration.
Tenants in existing maisonettes under the applicant's ownership will be made to move.	Private tenancy agreements are not a planning consideration.
No affordable housing proposed	Discussed in section 12 of this report.
Proposed refuse arrangement inadequate. Provision required for 22 flats, not 16.	Refuse arrangements are in line with the Council's guidance. Requirements for 22 units is the same as that for 16.
No objection subject to commercial access being retained to rear of the site.	Commercial access would be retained.
Existing rear site access not correctly shown.	Officers have measured and confirmed the plans as being accurate.
The temporary access to the existing units is an area that is being excavated so there would be a time that no access to existing flats would be possible.	Full details of the temporary access to be secured by condition to ensure access is provided throughout the development.
Proposed works on land owned by Boots, not the applicant.	Relevant stakeholders have been served notice by the applicant. No objections from Boots have been received.

Existing flats 4-6 ignored in the proposed plans.	The original proposal included private amenity provision for these units but was rejected by relevant occupiers and therefore removed. Existing units have no private amenity to be lost.
Revised plans show 3 flat re-clad and 3 flats unclad – this will look awful.	No cladding is proposed in the revised scheme.
Access to rear garden of 29 Tewson Road through the site would be removed.	These are property issues as relates to a private right of way and therefore not a relevant planning consideration.
Damage to front boundary wall of No.29 Tewson Road from delivery vehicles.	Developer has agreed to provide CCTV to rear of the site to ensure if damage occurs that the relevant party can be held to account. Final details to be secured by condition.

## 7.0 Planning Context

7.1 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)**
- **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.

7.2 For full details of relevant SPD / Documents refer to Appendix 3.

7.3 In addition to the above, Officers also have regard to the Approved for Publication Draft London Plan which has been formally approved by the Mayor. This is a new, stand-alone publication version of the Plan and has been prepared to address the Secretary of State’s (“SoS”) directions of 13<sup>th</sup> March 2020 and 10<sup>th</sup> December 2020 to the Intend to Publish London Plan. The Approved for Publication Draft London Plan replaces the Intend to Publish version as the most up to date Draft London Plan.

7.4 The Mayor formally received confirmation from the Secretary of State that he is content for the London Plan to be published as confirmed in a letter dated 29 January 2021. Formal publication of the new London Plan has not yet occurred, and the 2016 London Plan remains the adopted plan, however the policies within the Publication London Plan have substantial weight as a material consideration in the determination of planning applications.

## **8.0 Planning Considerations**

8.1 The planning considerations relevant to this application are as follows:

- Principle of Development
- Density
- Proposed Unit Mix
- Affordable Housing
- Standard of Accommodation
- Design and Heritage
- Neighbouring Amenity
- Highways
- Refuse
- Environmental Health
- Sustainability
- Ecology and Biodiversity
- CIL
- Legal Agreement

## **9.0 Principle of Development**

### *Reduction in Employment Floorspace*

9.1 Policy EA(a) of the Core Strategy outlines that the Royal Borough seeks to maximise the contribution to employment in Royal Greenwich from sites in existing or previous employment use.

9.2 The proposed development would see a loss of commercial floor space, with the existing 1,000.62sqm being reduced to 590.62sqm. This would equate to a loss of 410sqm and would be contained to first and second floor levels, with the size of the ground floor unit remaining unchanged. A small ancillary area would also be removed from second floor level.

9.3 Whilst the development would result in a reduction to the existing commercial floor space, Officers note that the space to be lost is used primarily for ancillary purposes, comprising stock areas, canteen, office space,

staff toilets and a bakery area. The applicant has asserted that this space is surplus to requirement and that an A1 retail use could continue to operate effectively despite its loss. To this end, Officers noted the presence of an additional ground floor stock area during the site visit, with the majority of the unit's stock appearing to be stored here rather than the first-floor space. An existing office space at ground floor level would also be retained for use by the store's manager.

- 9.4 The development would not result in the loss of a street facing unit and would therefore maintain the integrity of the Plumstead Primary Shopping Frontage. Furthermore, the reduced unit size would still be significantly larger than those within the existing block, as can be seen from the table below:

<b>Unit No.</b>	<b>Floor Area</b>
152 – Tiwa n Tiwa (Use Class A3)	125sqm
154 – Plumstead Pound Store (Use Class A1)	152sqm
156 – Boots Pharmacy (Use Class A1)	138sqm

- 9.5 Officers therefore conclude that the proposed unit size would still be functional as a commercial space and would not result in any detrimental reduction in retail output.
- 9.6 Officers also have regard to the other benefits which would be brought about by the proposed development, most notably the creation of additional residential dwellings to the borough's housing stock. Whilst the borough is on track to meet its housing delivery targets, the proposed units would nonetheless add to this, providing additional private accommodation within the District Centre. An off-site affordable housing contribution would also be provided to bolster the Council's social housing initiatives, as well as other contributions towards the Plumstead Good Growth public realm improvements.
- 9.7 Finally, it is noted that the reduced unit size and alterations to the rear access arrangements would require the store to accept deliveries from smaller vehicles. This would benefit existing neighbouring residents through a reduction in noise and disturbances and damage to property, the full details of which will be discussed in the neighbouring amenity section of this report.
- 9.8 Given the above, it is considered that the proposed reduction in commercial floor space can be supported.

## *Intensification of Residential Use*

9.9 Given the presence of existing dwellings on the site, it is considered that the principle of residential use has already been established. Furthermore, Policy TCI specifies that residential development in town centres will be supported, alongside commercial uses. On this basis, no in principle objections are raised to the proposed intensification of residential use, subject to acceptable impacts with regard to the remaining planning considerations, which will be discussed throughout this report.

### **10.0 Density**

10.1 London Plan Policy requires development optimise housing output for different types of location within the relevant density range set out in Table 3.2 of the document. Core Strategy Policy H5 also states that while assessing proposals for new residential development, the Royal Borough will take into account the key relationships between the character of the area, site location and housing densities. The supporting text states that London Plan Policy 3.4 will be utilised to guide rates for housing density in applying local context to the settings defined in the London Plan.

10.2 The subject site is in an urban setting with a PTAL of 4 and area of 0.2ha. The development would deliver 16 units, which in addition to the six existing maisonettes on site would result in an average of 2.8 habitable rooms per unit (hr/u). The development would achieve density ratings of 110 units per hectare (u/ha) and 310 habitable rooms per hectare (hr/ha), which would sit at the lower end of the thresholds set out in the London Plan. For clarity, the relevant thresholds for this setting set a maximum density level of 70-260 u/ha and 200-700 hr/ha, although it is noted that these figures are a guide rather than a prescribed standard.

10.3 Given the above, it is considered that the density of the proposed development would be acceptable in principle in this location.

10.4 It should also be noted that the Approved for Publication London Plan has moved away from quantifying residential density and instead advocates a design-led approach based on local context, and specifically seeks to avoid maximum density caps. Officers will therefore have regard for this in the design section of this report.

## 11.0 Proposed Unit Mix

11.1 Policy H2 of the Core Strategy outlines that a mix of housing types and sizes will be required in all developments including conversions and should contain a proportion of 3, 4 and 4+ bedroom units. It continues, stating that the exact mix on each site will vary according to the location of the development and the character of the surrounding area and will be affected by factors such as; the need to protect small and medium sized family dwellings from sub-division and conversion, the level of accessibility to public transport, schemes for special needs groups, or where there is a poor external environment.

11.2 The development proposes the following mix:

Unit Type	Occupancy	Quantum		Percentage	
1 bedroom	2 person	8		50%	
2 bedroom	3 person	1	4	6%	25%
	4 person	3		19%	
3 bedroom	5 person	3	4	19%	25%
	6 person	1		6%	

11.3 The overall mix of units is considered to be acceptable, with 25% of all proposed units being larger family sized units. While half of those proposed would be smaller one-bedroom units, given the site's location in a Town Centre this is considered to be appropriate. Furthermore, when taking account of the six existing two-bedroom maisonettes, the mix of units on site changes to the following:

Unit Type	Quantum	Percentage
1 bedroom	8	36%
2 bedroom	10	45%
3 bedroom	4	18%

11.4 The above is considered to represent a good mix of unit types. No 4+ bedroom units are proposed in this instance but given the size and nature of the proposed development, no objections are raised in this regard.

## **12.0 Affordable Housing**

- 12.1 Policy H3 requires all developments of 10 or more units to provide at least 35% affordable housing. The precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and of the development, including financial viability.
- 12.2 In support of the application the developer provided a viability assessment in which it asserted that the development would be unable to viably provide any on-site affordable housing due to factors including build costs and other required financial contributions such as CIL. Instead, the assessment proposed that an in-lieu payment be made in line with the surplus profit, which amounted to £16,000.
- 12.3 The assessment was independently evaluated by one of the Council's preferred viability specialists, who initially cast doubt on the estimated surplus. Discussions took place between both parties, with additional supporting information being provided by the applicant to substantiate the findings in their viability statement. This was reviewed by the Council's specialist, who subsequently concluded that a surplus of £28,389 would be generated.
- 12.4 The findings of the Council's specialist were relayed to the applicant, who agreed that the larger sum be paid in-lieu of on-site affordable. However, Officers highlighted that paragraph 64 of the NPPF makes it clear that major residential developments are expected to provide a minimum of 10% affordable homes. While there are certain exemptions to this which are outlined in the same paragraph, the proposed development would not fall within any one of these categories.
- 12.5 The Council's Planning Obligations SPD outlines that if a financial contribution is considered to be acceptable, then a contribution of £100,000 per home will be charged. On this basis, 10% of the proposal would represent 2 units and a minimum payment of £200,000 required. Any provision below this would undermine both the Council's and the Mayor's vision of providing an increased level of affordable housing within the borough. It was therefore put to the applicant that if no on-site housing could be provided, a minimum payment of £200,000 would be required in order to support the proposal, irrespective of the outcome of the viability process.
- 12.6 The applicant has since agreed a payment of £200,000. While this would fall short of the 35% policy requirement, given viability specialists for both the applicant and the Council concluded that the surplus from the development would be significantly below this, the proposed offer is considered to

represent an acceptable compromise between the parties. In agreeing the sum, Officers have also had regard to the fact that the development would make efficient use of the land by maintaining employment opportunities, whilst simultaneously maximising the residential potential. It is also acknowledged that in this location securing higher returns would likely be more challenging than other more affluent areas of the borough, especially given the smaller scale of the proposal.

- 12.7 The requirement for an increased sum also sends a clear message to developers that the Local Authority is committed to the delivery of affordable housing and will not accept proposals where the minimum 10% outlined in the NPPF is not delivered, irrespective of the outcome of any viability assessment.
- 12.8 On balance therefore, Officers consider that the in-lieu payment of £200,000 can be supported.

### **13.0 Standard of Accommodation**

- 13.1 London Plan Policy 3.5 Quality and design of housing developments requires all housing developments to be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies. Table 3.2 of the London Plan outlines the relevant standards for residential developments in London, while the Nationally Described Space Standards set out the national requirements. This is supported by Core Strategy Policy H5.

#### *Proposed Units*

- 13.2 The proposal has been revised at the request of Officers to ensure a satisfactory standard of accommodation is provided, although it is noted that in most instances these represented small amendments. As a result, all units now meet the minimum requirements outlined within the Nationally Described Space Standards and London Plan. The majority of units would be dual aspect, with the five which are single aspect being south or east facing. All units would feature good levels of outlook and privacy.
- 13.3 All but three of the proposed units would benefit from private balconies to the required London Plan sizes. This would be in addition to communal amenity spaces at roof level and within the existing courtyard at first floor level. Where balconies have not been provided for three of the units, their removal was at the request of Officers due to overlooking issues. Nevertheless, these units would still have use of the two community amenity areas.

- 13.4 Unit stacking has been implemented where possible to minimise noise transfer between units. Officers do however recommend a condition requiring details of sound proofing between units to ensure there is no unacceptable noise transfer between units where stacking is not achievable. Subject to this being secured, it is not considered likely that any unacceptable noise transfer would occur between units.
- 13.5 Overall, it is considered that an acceptable standard of accommodation would be provided for the proposed units.

#### *Existing Maisonettes*

- 13.6 The three maisonettes in the applicant's ownership would be refurbished as part of the development. Initially the application sought to reconfigure the top floor of the maisonettes to avoid overlooking from the proposed units to the south. However, Officers raised concerns regarding the layout, specifically the quality of accommodation which would have been afforded to the single bedrooms. It was therefore advised that the units be reverted back to the original layouts, with louvers added to the single bedroom to avoid overlooking. This has been actioned by the applicant to the satisfaction of Officers. The details of the louvers will be secured by condition.
- 13.7 It is noted that the first reasons for refusal on the previous scheme centred around loss of outlook and adverse sense of enclosure for the existing maisonettes. To this end Officers would highlight that the previous scheme was set back just 10m from the maisonettes, with this having now been increased to 15m at the closest point. While this in itself would aid in reducing any possibility of overbearingness or increased sense of enclosure, it is also noted that at lower floor levels the windows facing the development serve kitchens, which are not classified as habitable rooms and thus would have limited impact on the standard of residential accommodation. Similarly, at upper floor level one of the two windows in each property serve stairs, which again are not considered to be habitable spaces. The final site facing window within the properties serve secondary bedrooms, but at 15m it is considered that this would be sufficient to ensure there would be no unacceptable overbearing impact or increased sense of enclosure. It is also noted that only one of the maisonettes would be this close, with the other two maisonettes in the applicant's ownership set back some 17.2m at upper floor level. On this basis it is considered that the scheme has overcome the previous reason for refusal.

- 13.8 The external staircase proposed under the previously refused application has been removed from the current submission, therefore addressing reasons for refusal 4 and 5 which centred around loss of privacy and increased noise and disturbance for residents with No. 148.
- 13.9 Each of the three maisonettes in the applicant's ownership would also be provided an area of private amenity space within the first-floor courtyard, adjacent to their respective front doors. This would provide additional privacy for the occupiers in the form of defensible space, where presently there is none. The provision of private amenity space was also offered to the other three existing maisonettes, but the relevant occupiers declined, and this has therefore been removed. Nevertheless, all existing maisonette units would retain access to the communal courtyard at first floor level, which after alterations would amount to 338sqm. They would also be afforded access to the proposed communal amenity space at roof level, resulting in a net increase of amenity space. Impacts on the maisonette units is discussed further in the Neighbouring Amenity section of this report.
- 13.10 Overall, the revised proposal is considered to deliver a high standard of accommodation.

#### **14.0 Child Play Space**

- 14.1 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. This is supported by Approved for Publication Draft London Plan Policy S4.
- 14.2 It is noted that Core Strategy Policy H(e) outlines that developments which include over 50 units of family housing must include suitably equipped and well design children's play areas. However, it is considered that the London Plan requirements, which do not have a minimum threshold, supersede this.
- 14.3 The proposed plans show play equipment within the communal roof terrace. However, this is indicative at this stage. It is therefore recommended that a condition be attached requiring full details be provided prior to first occupation of the units. Officer have used the GLA calculator to confirm that the required play space provision would be 30.1sqm.

## **15.0 Design and Heritage**

- 15.1 London Plan (2016) Policy 7.4 requires developments to have regard to the form, function, and structure of an area, place or street and the scale, mass, and orientation of surrounding buildings, while Policy 7.6 requires them to be of the highest architectural quality. These objectives are carried through into Policies D1 and D4 of the Approved for Publication Draft London Plan.
- 15.2 Policies DH1 and H5 of the adopted Royal Greenwich Local Plan Core Strategy with Detailed Policies (2014) require proposals to have a high quality of design and to be limited to a scale and design appropriate to the building and locality.
- 15.3 Given the proposed enlargement to the building would be set back within the site, views of the primary elevation from Plumstead High Street would remain largely unchanged. Initially the proposal did include improvements to the cladding on the primary elevation, which were welcomed by Officers as the current appearance is somewhat dated. However, these were later withdrawn by the applicant owing to ownership issues.
- 15.4 Views of the enlargement would be possible along a public footpath which runs adjacent to the site connecting the High Street with Strandfield Close along the eastern boundary. From here the enlargement would be set back 7.55m from the boundary, with the exception of the core which would be sited slightly closer at 6.87m. At third floor level the building would be set in from the main elevations with a setback of between 9.42m-10.65m (excluding the core which would retain the 6.87m setback observed at lower floor levels).
- 15.5 While the enlargement would be visible along the adjacent path, the building is considered to be well designed and appropriate within the context of a town centre. The incorporated setback from the boundary, together with that observed at top floor level, would provide sufficient visual relief to ensure the enlargement would not appear overbearing or overly dominant from the public realm. This would be aided by the fenestration proposed to the eastern elevation, which would not only provide visual breaks in built form, but also an increased level of natural surveillance along the public footpath, thereby improving safety in comparison to the existing arrangement.
- 15.6 Views of the development would also be possible to the rear of the site from both Tewson Road and Strandfield Close, but as it would be significantly set back from each of these roads the impacts would be limited. As noted above, the proposed enlargement is considered to be well designed and would represent an improvement in respect of the current more industrial

appearance, especially from the views to the rear of the site where current views consist of a large blank elevation.

- 15.7 The majority of the building would be finished in face red brick to match the existing masonry, with light grey brick used to emphasise fenestration features. White render would also be utilised at top floor level and within balcony recesses, while the building core would be in a darker grey cladding. Overall, the materiality proposed is considered to be acceptable and would integrate well within the surrounding site context. Final details of the proposed materials, including samples, is proposed to be secured by condition.
- 15.8 The site is in close proximity to the Grade II Listed Plumstead Fire Station, which is located a short distance to the west. At a local level Policy DH3 seeks to preserve and enhance the character and appearance of the borough's heritage assets, taking into account local scale, the established pattern of development and landscape, building form and existing materials. This is supported by Policy 7.8 of the London Plan and Policy HCI of the Approved for Publication Draft London Plan. Policy DH(i) of the Core Strategy further states that developments which would detract from the setting and proportions of a Listed Building or group will be resisted.
- 15.9 In this instance, whilst some view of the development may be possible from Plumstead High Street adjacent to the fire station, given the distance of some 90m, it is not considered that the proposal would result in any harm to the setting of the designated heritage asset.
- 15.10 Overall, the building is considered to represent a high quality design which would respond well to the character of the streetscene and wider area.

## **16.0 Neighbouring Amenity**

- 16.1 When considering the impact of development on the residential amenity of adjoining occupier's attention has to be given to the potential impact during the implementation of the development and once the development has been completed.
- 16.2 In terms of the impact on residential amenity during construction work Core Strategy Policy E(a) states that planning permission will not normally be granted where a proposed development would have a significant adverse impact on the amenities of adjacent occupiers as a result of unacceptable emissions of noise, light, vibrations, odours, fumes, dust, water, and soil pollutants. To this end it is inevitable that in all development there will be some level of disturbance during construction and whilst this may cause a

level of inconvenience it is noted that this is only for a temporary period of time. As such, it is considered that appropriate planning conditions can be imposed on the grant of planning permission to control any nuisance created during the construction process so that the level of inconvenience is kept to an acceptable level.

- 16.3 Royal Greenwich Local Plan; Core Strategy with Detailed Policy (2014) Policy DH(b) states that developments will only be permitted where it can be demonstrated that the proposal does not cause an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight, or privacy they enjoy or result in an un-neighbourly sense of enclosure. This is supported by London Plan Policy 7.6.

#### *Existing Maisonettes*

- 16.4 As mentioned in the Standard of Accommodation section of this report, of the six existing maisonettes, the three in the applicant's ownership would be renovated with louvers incorporated to the south facing single bedrooms windows to ensure there would be no loss of privacy or unacceptable overbearing impacts. The applicant has provided a daylight/sunlight study which confirms the south facing bedrooms would conform to relevant BRE standards despite the addition of louvres. Final details will be secured by condition.
- 16.5 With regard to the three remaining maisonettes, at lower floor level the windows facing towards the site all serve kitchens. Given these do not constitute habitable rooms, any impact on these fixtures would therefore have a limited impact on the living quality for the neighbouring occupiers. At upper floor level the relevant windows facing the site serve as primary fixtures to secondary bedrooms. The closest of these windows to the proposed development, that serving No.152, would be most impacted as it would see the proposed enlargement directly opposite. The remaining two fixtures serving Nos. 154 & 156 would maintain direct views past the development, thereby limiting impacts of the development. The window at No.152 would maintain a minimum separation distance of 17.2m, which is considered to be sufficient to safeguard against any unacceptable overbearing impacts or increased sense of enclosure. This is considered to address reason for refusal 1 of the previous refusal.
- 16.6 The proposed development would see windows serving both habitable and non-habitable spaces facing towards the existing maisonettes. However, the separation distances proposed are considered sufficient to ensure any mutual overlooking from windows would be at an acceptable level, as these would be

similar to what could be expected from traditional properties separated by a road. Screening has also been introduced to all balconies where views towards the maisonette bedroom windows would be possible, as the impact of overlooking from these structures would be more significant than what would arise from windows. Final details of the screening would be secured by condition.

- 16.7 As previously mentioned, the existing maisonettes would benefit from improvements to the existing shared courtyard at first floor level. This would see the area landscaped and generally improved in quality in comparison to the existing arrangement. The area would be for exclusive use by residents and would see the provision of benches to allow for better use and enjoyment of the space. It is noted that objections were received citing concerns that the inclusion of benches could result in additional noise and disturbance for neighbouring occupiers as a result of future residents congregating on them. As a result, the number of fixtures has been reduced by the applicant and moved away from existing neighbouring windows. While Officers welcomed the changes, it is nevertheless considered unlikely that the provision of these fixtures will directly result in the increased likelihood of antisocial behaviour or noise levels over what could reasonably be expected in a town centre location. Moreover, disagreements between residents over the use of communal amenity spaces, while not uncommon, is ultimately a management issue rather than a planning consideration. It is also noted that the existing space is clearly used as a communal amenity space, with the presence of children's toys and play equipment being evidence of this. The continued use of this space as such is therefore unlikely to result in any unacceptable increase in noise and disturbance in comparison to what is already experienced.
- 16.8 In addition to the improved courtyard area, the existing residents would also have access to the communal roof garden and associated play space equipment, final details of which would be secured by condition. This would result in a net increase of amenity space for existing residents, which together with the improved quality of the space would result in a positive impact for existing residents.
- 16.9 The existing and rather rundown residential entrance structure at first floor level, which provides residential access to the site from Plumstead High Street, would be removed and a new brick-built structure built in its place, again improving the appearance of the first floor courtyard area. Access from the rear of the site would be improved through the provision of a dedicated pedestrian access path within the site, where presently pedestrians must use the vehicle access. A secure gated entry system would also be installed at the rear, improving security and reducing the likelihood of fly tipping, which is

currently a significant problem to the rear of the site. Entry phone systems would be provided for all proposed units and maisonettes within the applicant's ownership. The applicant has also confirmed the systems would be installed in the three remaining maisonettes upon the occupier's request. Should the occupiers decline the offer, they would still be able to open the rear gates, but would need to travel down to the rear entrance to do so. Dedicated bike and bin stores would also be provided.

16.10 The external staircase proposed under the previously refused application has been removed from the current submission, therefore addressing reasons for refusal 4 and 5, which centred around loss of privacy and increased noise and disturbance.

16.11 The accompanying daylight/sunlight assessment confirmed that the existing maisonettes would meet the relevant BRE guidelines. There are a few transgressions, though these tend to be either VSC, or Daylight Distribution, but not both. The BRE guidance states that buildings may be adversely affected if both Daylight Distribution and VSC are materially affected.

#### *146 Plumstead High Street*

16.12 144-146 Plumstead High Street directly adjoins the site to the west and is currently occupied by Iceland food store. The neighbouring site features no residential properties which would be impacted by the proposed development.

#### *160-176 Plumstead High Street*

16.13 Nos. 162-176 Plumstead High Street are situated to the east of the application site, separated by a public footpath. Views onto the rear elevations of these properties, as well as onto their respective garden areas would be possible as a result of the proposed development. However, this would not be dissimilar to the existing arrangement, which sees similar views being possible from the existing first floor courtyard area. As such, Officers consider that there would be no unreasonable loss of privacy or increased overlooking in comparison to the existing arrangement. The same is true of No. 160 Plumstead High Street, which is located to the south of the above properties and faces directly towards the application site. Given the existing arrangements allow for views from a terrace like area, it is not considered that the proposed development would result in any detrimental harm in respect of privacy.

- 16.14 In terms of any overbearing impact, Nos.162-176 Plumstead High Street do not feature any windows or opening facing directly towards the application site, meaning the development would have little impact. No.160 would have windows facing directly towards the proposed development, the closest of which would be some 14m away. However, from Officer's site visit it appears that this window does not serve a habitable room. One other window within No.160 would be directly opposite the development, but this would feature a greater setback of approximately 22m. All other windows would not see the development directly opposite, rather there would just be views onto the landscaped first floor communal amenity space. This would in fact represent an improvement on the existing arrangement, where elements of the existing first floor storage area are directly opposite most windows within No.160.
- 16.15 It is also considered that the development would bring about benefits to the above properties, in the form of additional natural surveillance, thereby discouraging anti-social behaviour. This will especially benefit the path running along the rear of 162-176 Plumstead High Street, which is not visible from the public highway.
- 16.16 The accompanying daylight/sunlight assessment confirms that the neighbouring properties would be compliant with BRE guidelines.
- 16.17 Overall, the development is considered to have an acceptable impact on Nos. 160-176 Plumstead High Street, with the resultant impacts being largely similar to what can already be experienced from the existing arrangement.

#### *158 Plumstead High Street*

- 16.18 As with No.160 Plumstead High Street, No.158 is set back away from the high street, separated from the site by the public footpath. The neighbouring building is single storey and features one window facing towards the proposed development. Due to changes in ground level, No.158 sits approximately just under half way between the proposed ground and first floor level at the application site. At its closest point, the development would be set back 18.9m from the window, with the building's projecting stair core sited opposite. The main body of the proposed building would be some 19.7m away, with this setback increasing to 22m at third floor level.
- 16.19 Whilst views of the proposed development would be possible from the neighbouring window, it is considered that there would be sufficient separation to safeguard against any unacceptable overbearing impact or increased sense of enclosure. Views past the development would also still be possible from the affected fixture, albeit at an angle to the north. All other

windows and openings would be largely unimpacted by the development, with the majority of these located on the rear elevation.

- 16.20 Views onto the site facing window would be possible from the stair core windows and those serving proposed residential units, however, at the distances proposed it is not considered that there would be any unreasonable loss of privacy. Furthermore, the neighbouring property features extensive amounts of vegetation along the front boundary which would provide some additional screening from lower level windows within the proposed development. At higher levels, the viewing angles would become more acute, again lessening the impact.
- 16.21 The proposed building would feature two balconies facing towards No.158 at third floor level. The larger of the two balconies would be some 21m away, with views onto the neighbouring window at an angle. The second balcony would be 21.5m away and would have a more direct line of site onto the neighbouring window. However, the balcony would feature a greater setback from the main side elevation, which together with the height difference would significantly limit views. Officers also acknowledge the town centre location, in which density levels are considerably higher and overlooking between properties is unavoidable.
- 16.22 The accompanying daylight/sunlight assessment confirms that all but one of the property's windows to the front elevation would be compliant with BRE guidelines. The window which would fall below the relevant guidelines would only do so marginally. Furthermore, it is noted that in the model used, the window is shown as facing directly towards the application site, where in reality it is facing at a 45-degree angle, meaning the impact is likely to be even less than shown in the report. The report states that given the size of the fixture, it is likely to serve a bathroom. While Officers are unable to confirm that this is the case, given the above it is considered that even if it did serve a habitable room, the overall impact would be less than significant.
- 16.23 Overall, it is considered that the development would have an acceptable impact on No.158, given the town centre location.

## *2 Strandfield Close*

- 16.24 No.2 Strandfield Close is a two-storey detached dwelling which lies immediately to the south of 158 Plumstead High Street, and similarly faces towards the application site. Due to changes in ground level, No.2 sits approximately just under half way between the proposed ground and first floor levels at the application site. The proposed development would sit approximately 14.2-14.8m from the front elevation of the neighbouring

property, with this increasing to 16.0m-16.6m at third floor level due to the incorporated setback.

16.25 Whilst the proposed development would introduce new built form in close proximity to the neighbouring dwelling, Officers would again highlight that these separation distances are not uncommon in more densely populated town centres and urban area. For example, front elevations of properties on Tewson Road to the south of the application site are separated by approximately 15.4m in places. Furthermore, to the north of the site along Barth Road, these are reduced to 14.5m.



16.26 In addition to the above, it is noted that of the 6 windows within the front elevation of No.2, only two of these serve habitable rooms, with the remaining fixtures serving either bathrooms or the property's stairway. At ground floor level the habitable window relates to the main living area, which also features windows in the rear elevation and through onto a half-glazed conservatory in the rear garden. At first floor level the relevant habitable window serves one of the property's five bedrooms. While the development would have an impact on this fixture, with mutual views between windows possible, as noted above, it is not unprecedented to experience such separation distances within town centre locations. The remaining four bedrooms within the property would be largely unimpacted by the development, with windows facing away from the site towards the east.

- 16.27 Of the two balconies on the eastern elevation of the proposed building, only the smaller would afford views onto No.2 Strandfield Close. Views from the larger balcony would be at a sufficient angle to largely restrict views onto the neighbouring dwelling, with the proposed building core also helping to obscure views.
- 16.28 The smaller of the proposed balconies serving Flat 13 would allow for more direct lines of sight onto the neighbouring property. Initially concerns were raised by Officers, with the applicant subsequently incorporating a setback from the main side elevation. Screening was also introduced along the side of the balcony. The set back and increased height of the balcony would allow for some protection in terms of privacy, especially to the ground floor living area where the viewing angle would be more obscure and where the relevant room is served by another window. Nevertheless, in order to ensure that the privacy of the neighbouring bedroom window, a condition will be imposed requiring a planter and vegetation details prior to first occupation of Flat 13.
- 16.29 In respect of daylight/sunlight, the accompanying assessment confirms that only one of the properties windows would fall below BRE VSC guidance, with the relevant shortfall being marginal. However, Officers have confirmed that this relates to a bathroom and therefore would have no detrimental impact upon residential amenity. Regarding daylight distribution, all rooms to No.2 fall below the BRE criteria. Given the juxtaposition of the windows to the common boundary, and therefore the site, this is unsurprising and a natural consequence of infilling an underdeveloped plot of land. Furthermore, as mentioned previously, only one of the fixtures is a primary fixture serving a habitable room.
- 16.30 On this basis, it is considered that the development would, on balance, have an acceptable impact on the residential amenity of No.2.

#### *4-8 Strandfield Close*

- 16.31 Nos. 4-8 Strandfield Close terraced properties to the south of No.2. Unlike No.2, they would feature no windows facing directly towards the application site, rather all fixtures would be at roughly a 90-degree angle and would be set back by a minimum of 16m. Given the relationship between the proposed building and Nos.4-8, it is not considered the development would result in any significant loss of privacy or increased overlooking. Nor would it result in any unacceptable overbearing impact of increased sense of enclosure from the neighbouring dwellings. Views onto the rear gardens of the neighbouring properties would be possible from windows within the proposed development, but these would be no worse than what can already be

experienced from first floor windows within the existing properties on Strandfield Close.

16.32 The applicant's daylight/sunlight assessment gives consideration to No.4, as the remaining properties would be a sufficient distance from the development to ensure there would be no impact in terms of overshadowing or loss of light. In respect of No.4, the development would be fully BRE compliant both in terms of VSC and daylight distribution.

### *13-25 Tewson Road*

16.33 Nos.13-25 Tewson Road are two storey terraced properties to the south-east of the application site.

16.34 In terms of scale and massing, at its closest point the existing building on site is of a similar scale to that proposed, with the enlarged element some 23.5m away from the rear elevation of the nearest neighbouring dwelling. On this basis it is not considered that the development would result in any unacceptable overbearing impacts or increased sense of enclosure.

16.35 Windows and balconies in close proximity to the side boundary which could provide views onto the rear elevation of No.25 would feature window surrounds and privacy screening in order to ensure there would be no unacceptable loss of privacy or increase in overlooking. Windows serving habitable rooms within the side elevation of the proposed dwelling would also be obscure glazed up to 1.8m to further reduce impacts to the neighbouring rear gardens. Overall, it is considered there would be no unacceptable loss of privacy to the neighbouring dwellings.

16.36 Regarding daylight/sunlight, all windows meet the BRE criteria in terms of VSC and daylight distribution.

16.37 Concerns have also been raised regarding potential overshadowing to the rear gardens. For context, the BRE criteria is that at least 50% of the amenity area should be in sunlight for at least 2 hours on 21 March, or where this is not the case, care should be taken to not reduce the existing levels by too much, namely a 20% reduction of sunlight. The overshadowing study undertaken by the applicant shows that the amenity areas of 21 to 25 Tewson Road, those most likely to be impacted by overshadowing, would comply with this. No.25 would experience a 10% reduction, with Nos.21 & 23 seeing a reduction of just 1%. It should be noted that the initial daylight and sunlight study submitted with the application it outlined a more significant impact on overshadowing to the rear garden of No.25. However, since then the applicant has visited the neighbouring property and confirmed ground levels,

leading them to conclude that the impact would not be as significant as originally considered.

#### *29-41 Tewson Road*

- 16.38 Nos.29-41 Tewson Road are two storey terraced properties to the south of the application site. Of these properties, only No.29 features windows facing towards the application site, meaning the remaining dwellings would not be impacted in terms of any increased sense of enclosure or overbearingness. Furthermore, from the site visit it appeared that the ground floor windows within No.29 that face the site serve non-habitable rooms, namely the kitchen and a bathroom. Another smaller window to the first floor also faces the site, but given the size and positioning of the fixture, it is also likely to serve a non-habitable space, such as bathroom/toilet or circulation space. As no habitable windows face the site, there would be no unacceptable loss of privacy for neighbouring occupiers.
- 16.39 Windows serving habitable rooms within the proposed development which would look towards the rear gardens of the neighbouring dwellings would feature obscure glazing up to 1.8m, thereby preserving privacy for these areas. Some views onto rear gardens would be possible from the proposed balconies, but these would be at an angle and some 18m away. Given the town centre location it is not considered that this would be unreasonable.
- 16.40 Regarding daylight/sunlight, as the majority of properties are to the south of the site with no windows facing towards the proposed development, these would be unimpacted by the development. No.29 however does feature windows facing towards the site, and was therefore included in the daylight/sunlight assessment. This showed that all windows would meet the BRE criteria for VSC, save for kitchen and bathroom windows to the rear which fall below. However, the residual VSC value for at least one of the windows that serves the kitchens (W3: 18.43%) is considered good for urban location. Again, given the juxtaposition of the windows to the common boundary, and therefore the site, this is an unsurprising and a natural consequence of infilling an underdeveloped plot of land. Furthermore, as the impacted windows serve a non-habitable room the impact on neighbouring amenity would be minimised. All rooms meet the BRE criteria in terms of daylight distribution.
- 16.41 The development initially proposed to locate the bin store adjacent to the side elevation of No.29. However, concerns were raised by Officers that this may lead to an unacceptable increase in odours for the neighbouring occupiers and the applicant subsequently revised the scheme to instead have the cycle store in this location.

16.42 The development is therefore considered to have an acceptable impact on Nos. 29-41 Tewson Road.

## **17.0 Highways**

- 17.1 London Plan Policy 6.3 states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed, and that development should not adversely affect safety on the transport network. The Approved for Publication Draft London Plan focuses heavily on improving infrastructure and facilities for cycling and subsequently increasing its mode share across the city.
- 17.2 Plumstead High Street is a busy classified road and bus route, which is subject to loading and waiting restrictions. Tewson Road, to the rear of the site, is a residential street that has parking bays along its length. Both roads are subject to a 30mph speed limits and has footways along both sides.
- 17.3 The site is located approximately 630m from Plumstead mainline rail Station and within walking distance to 7 bus routes. It therefore has good access to public transport, with a PTAL of 4, on a scale of 0 to 6b (where 6b is excellent). This will be further improved by the opening of the Elizabeth line. Riverboat services also operate from Woolwich Arsenal Pier.
- 17.4 The development proposes four standard and two accessible car parking spaces. The Approved for Publication Draft London Plan indicates a maximum car park standard of 0.5 spaces per unit could be provided, therefore the proposal provides an acceptable number of spaces. Twenty percent (20%) of the parking spaces will have electric charging points, with passive provision for all remaining spaces to be secured by condition, as per Approved for Publication Draft London Plan requirements. No motorcycle spaces are shown.
- 17.5 The access to the site is approximately 6.5m wide from an existing point on Tewson Road. A new pedestrian access is also to be provided, where presently the existing residents must share access with vehicles. This is considered to improve pedestrian safety, which could otherwise be in conflict with commercial vehicles. While it is shown that sufficient room is still available for large delivery vehicles (up to 7.5 tonnes) to service the retail units on Plumstead High Street they will have little or no tolerance in manoeuvring. It will not be possible for articulated lorries to visit the rear service area. This was discussed with the applicant who confirmed that smaller vehicles would be used for deliveries to the commercial units. Given the size of the units Officers raise no objection to this. Moreover, the use of smaller vehicles will further aid towards reducing conflicts with pedestrians to

the rear of the site, thereby improving pedestrian safety. Final details of the exact vehicle sizes are to be secured by condition.

- 17.6 It is noted that one of the reasons for refusal for the previous application on the site was due to residential access for proposed units being solely from the rear. As the current proposal has access from Plumstead High Street as well as the rear, this is considered to have addressed this concern. Disabled access would only be possible from the rear, but this would be no different to the existing arrangement, with this having already been noted above as an improvement on the existing.
- 17.7 With the parking provision and a high PTAL, from the Transport Statement that accompanies the submission it is indicated that most trips generated by the residential element would be by public transport.
- 17.8 While it is recognised that policy set out within the Approved for Publication Draft London Plan seeks to reduce parking to minimal levels in areas of good accessibility, it is also important to ensure that the proposals do not lead to displaced parking on the local highway network which would cause problem to existing residents.
- 17.9 As there is parking for only 6 car park spaces it is likely that parking demand not met on site could occur in surrounding roads which are largely unrestricted. Given the nature of the area it is believed that there is already a heavy demand for parking on street in the vicinity. While there is great demand for on street parking in the area, the site is not within a CPZ.
- 17.10 An overnight parking survey of local roads was carried out to determine the level of stress and found that there is opportunity for additional parking. It is noted that several objections received cited concerns of the inclusion of the nearby private road, Old Tramyard, within the survey where in fact parking along this road is private. This was relayed to the applicant who subsequently removed this from the assessment.
- 17.11 The revised survey confirmed there was sufficient parking on street to facilitate the development and this was reviewed by the Council's Highways Officer, who raised no objections. However, as the site is located in a town centre primary shopping frontage, the relevant Officer advised that a daytime survey would also be required to ensure the development would not exacerbate existing problems for residents, businesses and visitors.
- 17.12 The applicant subsequently undertook a daytime survey, which the Council's Highways Officer confirmed showed that the surrounding roads have capacity to accommodate additional parking demand. It should be noted that the

daytime survey was undertaken in September this year, during the current Covid-19 pandemic. As such, it is acknowledged that the findings of the survey will be skewed slightly, with people frequenting the high street less often for retail purposes. Nevertheless, whilst visitors to the town centre will have been impacted, so too will the number of people working from home, some of whom would previously have commuted via private vehicle thereby freeing up spaces during the day. The findings of the daytime survey showed there was sufficient parking during the day to facilitate the development, with the Highways Officer confirming that no objection was raised.

- 17.13 While it would be preferable to undertake the survey during more typical conditions, it is unclear exactly when the country is likely to return to what could be considered normality. Given this, it would be highly unreasonable to request the applicant wait until the end of the pandemic to undertake the survey, especially as the development itself would help stimulate the local economy during construction and with the developer committing to GLLAB. Therefore, it is considered that a balanced judgement is required in this instance.
- 17.14 Objections have been received from existing residents concerning the loss of parking to the rear of the site, with this also included as a reason for refusal in the previous application. However, the land in question is privately owned, with the current parking appearing to be at the landowner's discretion. Officers have liaised with the Council's Legal Team and it was confirmed that the landowner is within their right to withdraw permission. As the land is private, any existing arrangements are a private matter between the relevant parties and not a valid planning consideration. Furthermore, the reduction in car parking would be in line with the objectives of the Approved for Publication Draft London Plan, which seeks to reduce reliance on private forms of transport. The remainder of the reason for refusal focuses on reduced manoeuvrability at the rear. As the applicant has provided swept path drawings Officers consider this to have been satisfactorily addressed.
- 17.15 Cycle parking is provided at ground floor level in two dedicated stores, with a total number of 40 spaces provided. This is well in excess of the current London Plan requirements which require 24 spaces. The provision is also in excess of Approved for Publication Draft London Plan standards even when factoring provision for the existing maisonettes, which would increase the minimum threshold to 37. It is noted that the current layout would not allow for larger types of bicycles, as set out in the London Plan Cycling Design Standards. However, it is considered that the provision of additional spaces for existing residents, which is not a requirement, would bring about sufficient benefits to outweigh this.

- 17.16 Another concern which has been received from neighbouring residents relates to existing conflicts between delivery vehicles and property boundaries adjacent the rear entrance to the site. It is alleged that the front boundary wall of adjacent properties have been damaged in the past by reversing vehicles, with the neighbouring occupiers having to foot the bill. To this end, Officers would first highlight that the proposed development would likely reduce the occurrences of this, as the proposed layout would only allow for smaller vehicles to enter into the site, meaning chances of conflict would be reduced. Full details of the type and size of delivery vehicles will be secured in a delivery and serving plan to be secured by condition. Notwithstanding this however, the concerns were relayed to the applicant by Officers, and it was agreed that a surveillance system be installed to monitor the rear entrance. This would not only aid in identifying parties should damage occur again in the future, but would also aid in improving safety and security to the rear of the site for both occupiers of the development and those immediately neighbouring it. Details of the system will be secured by condition, including processes for dealing with complaints.
- 17.17 A construction management plan has been provided. However, the Council's Highways team have requested a revised plan be secured by condition to ensure it covers all necessary issues.
- 17.18 As part of the development contributions, a £12,000 fee has been agreed for highways works. These would cover the alteration of existing vehicular crossover and improvements to pavements to the rear of the site, as well as to the Plumstead Good Growth project, which is a Council scheme that will see the public realm along Plumstead High Street improved.
- 17.19 Given the lack of parking, but recognising that car use may still be required on an ad-hoc basis, car club use is supported. The nearest on-street car club space is located in Walmer Terrace, (8 min walk) to the west. A contribution will therefore be sought to contributing to the existing car club, with the first 5 years membership paid by the developer to encourage use.
- 17.20 The framework of a Travel Plan is provided and includes measurable targets and monitoring in order to promote sustainable travel for future residents. Personalised Journey Planning could also positively influence journey patterns from the start. A Travel Plan for workers will also be required.

## **18.0 Refuse**

18.1 Policy DHI of the Core strategy outlines that all developments are expected to demonstrate on-site waste management including evidence of waste reduction, use of recycled materials and dedicated recyclable waste storage space.

18.2 The following refuse arrangements are required for the residential element of the development:

1100L Recycling	1100L Residual Waste	500L Organics Recycling	1100L WEEE Recycling	1100L Textiles Recycling	Total provision
3	3	1	1	1	9

18.3 The proposed plans show provision for 9 bins (8x 1100L & 1x 500L), with the proposed store within 15m of the site entrance, as per the Council's Waste SPD. The refuse arrangements were reviewed by the Council's Street Services team who confirmed that no objections were raised.

## **19.0 Flood Risk**

19.1 The site is located within Flood Zone 1, which is at lowest risk of flooding. As such, no flood risk assessment is required in this instance.

## **20.0 Environmental Health**

### *Air Quality*

20.1 An air quality assessment was submitted in support of the application and was reviewed by the Council's Environmental Protection team. The relevant Officer raised concerns regarding one of the ground floor commercial units, which is in operation as an A3 commercial kitchen, as complaints had been received regarding the extract system in place. Officers confirmed with Environmental Health that the issue was separate from the current application, with the occupiers of the commercial units having failed to comply with a separate permission (19/1379/F). Enforcement action has since been taken, resulting in the occupier of that unit submitting a planning application to resolve the matter. As such, Officers do not consider this relevant to the current proposal.

20.2 The above aside, the Environmental Health Officer confirmed that the air quality assessment was thorough in its assessment of ambient pollution from traffic. Officers are satisfied to proceed on this basis.

## Noise

- 20.3 A noise impact assessment prepared by KP acoustics was submitted in support of the application. The report recommended a robust glazing specification which would ensure that suitable internal noise levels will be provided for the development in accordance with BS8233. It was concluded that no further mitigation measures would be required.
- 20.4 When reviewing the details of the application, the Environmental Protection Officer raised no concerns regarding the noise assessment. Nevertheless, it is noted that the noise impact assessment does not cover internal noise transfer between units. Given not all of the units are stacked in the same layout, there will be instances of main living areas above bedrooms. It is therefore considered appropriate to attach a condition requiring details of sound insulation to mitigate sound transfer between units.
- 20.5 Reason for refusal 3 of the previous application cited concerns that the location of the proposed units above existing retail uses, substation and service yard would lead to an unacceptable level of noise and disturbance for future occupiers. To this end, Officers would highlight that it is not unusual for residential dwellings to neighbour or be situated on top of commercial uses within town centre locations such as this. This is evident in the fact that the existing site has existing residential uses at first floor level directly fronting onto the entrances to the commercial units. Similar arrangements are also observed throughout Plumstead High Street. As such, it is not considered that this would warrant objection to the current proposal.

## Contaminated Land

- 20.6 The applicant has submitted a Phase I Report from Mayer Environmental which makes a number of recommendations for further risk assessment:
- Soft landscaping/communal area – requirement for intrusive soil survey – prior to any imported soil or turf being laid (cover layer details will need to be approved by this Department - dependant on results), pg.29;
  - UXO further assessment required as stipulated on pg.15 & pg. 30;
  - Asbestos survey required in line with recommendations of MEL, pg. 29.
- 20.7 These were reviewed by the Council's Environmental Protection team who confirmed that they were acceptable and requested they be adhered to. They also asked that the standard land contamination be included as part of any decision.

20.8 In addition, as it is understood that asbestos containing materials (ACM) may be located in the fabric of the existing building – a condition requiring a full asbestos survey be carried out by a qualified individual prior to demolition or refurbishment will be sought to quantify the presence of asbestos.

## **21.0 Sustainability**

### **21.1 Domestic energy performance**

*Compliant Part LIA 2013 base case*

21.2 Baseline energy and associated emissions have been assessed for Building Regulations 2013 Part LIA. To comply with Royal Greenwich Local Plan (2014) policies: DHI, EI, London Plan 5.2 (2016) and SI2 of the Approved for Publication Draft London Plan (2020), the proposed residential units will have to meet zero carbon against Building Regulations 2013 Part L. The compliant Part L 2013 base case energy and associated carbon dioxide emissions have been calculated to be 92.2 MWh/year and 19.19 tonnes CO<sub>2</sub> per year.

*Be Lean*

21.3 A range of energy efficiency measures are proposed that improve the concurrent notional building specification of BR Part LIA 2013 including U-Values and air permeability, 100% low energy lighting, natural ventilation through openable windows, solar control glazing with g-values of 0.57 and shading in the form of overhangs or louvres to minimise solar gains. The landlord would also have access to a full fault diagnostics and energy sub-metering system. These measures predict an annual reduction in regulated CO<sub>2</sub> emissions of 1.9 tonnes, equivalent to 10% beyond Building Regulations Part L 2013 Baseline. The proposed measures also predict an improvement of 15% in the energy consumption over the baseline.

*Be Clean*

21.4 The proposed scheme is located within an area designated as likely to benefit from district heating network (DHN). The accompanying energy statement has identified the existing Greenwich Peninsula DHN and states that due to no published plans to extend this to include the current project, connection to an offsite heat network is not prioritised. However, due to the site being in a designated heat network area, a communal heating system run by Air Sourced Heat Pumps with heat interface units to monitor, charge and distribute the space underfloor heating and hot water are proposed.

- 21.5 The submitted Energy Statement and Mechanical Services Heating Report state that the development will be future proofed to connect to an offsite heat network by providing valved connections and space allocated within the plantroom for any future equipment required such as plate heat exchanger and associated valves, controls etc. An indicative description of the centralised ASHP system can connect to an existing DHN with low, medium and high temperature water input has been provided in the Mechanical Services Heating Philosophy Report. However, additional technical details and demonstration are required. This information will be required through appropriate condition.
- 21.6 The proposed heating system predicts a reduction in regulated CO<sub>2</sub> emissions of 4.5 tonnes per, equivalent to 25.9% over the Be Lean stage. The proposed heating system also predicts an improvement of almost 2% in the energy consumption over the Be Lean case.

*Be Green*

- 21.7 A number of renewable technologies has been investigated in terms of technical, physical and financial feasibility, with Solar PV panels found to be most appropriate. Technical details for the solar PV in line with GLA's energy statement guidance, 2018, and tables showing the allocation of the PV into each dwelling have been provided. The 7.11kWp solar PV is predicted to generate 5.4 MWh per year of electricity and reduce the annual regulated CO<sub>2</sub> emissions by 2.8 tonnes, equivalent to 21.9%, beyond the Be Clean case.
- 21.8 A detailed roof plan showing the solar PV panels on the roofs of the proposed development as well as demonstration of the constraints of the roof that prohibit maximisation of the solar PV panels will be secured by condition.

*Residential Total*

- 21.9 In line with the submitted Energy Statement, the combination of the proposed measures predicts an annual reduction in regulated CO<sub>2</sub> emissions of 48%, equivalent to 9.2 tonnes CO<sub>2</sub>, beyond the compliant Part LIA 2013 base case. The development does not meet zero carbon and therefore the remaining annual carbon shortfall of 9.98 tonnes CO<sub>2</sub> to a 100% is proposed to be offset through a carbon offsetting contribution which is calculated to be £28,443 (based on a carbon price of £60/tonne carbon for 30 years).

## 21.10 Renewable/ Low Carbon Energy Monitoring

21.11 Compliance with London Plan (2016) Policy 5.7 (Renewable Energy) and RBG Core Strategy policy EI (Carbon Emissions) will be demonstrated through a monitoring agreement that will be signed between the Local Authority and the applicant to monitor the effectiveness of the renewable/low carbon energy technologies proposed for the development. The agreement will be signed at prior to first occupation to comply with the prevailing monitoring requirements which will include the installation of an on-site automatic meter reading (AMR) device. This requirement will be secured in the legal agreement.

## 21.12 Overheating and Cooling

21.13 A dynamic overheating analysis has been carried out in 12 representative dwellings to reduce the risk of overheating. The results showed that all habitable spaces tested under CIBSE TM52 criteria and 2020 weather file, high emissions, 50% percentile scenario pass the criteria with internal doors assumed fully openable during occupancy hours, Mechanical Ventilation with Heat Recovery (MVHR) and windows' g value of 0.57 apart from the energy efficiency measures stated above.

21.14 The same habitable rooms were assessed under the more extreme weather scenarios and failures have been noted. In line with the report, the developer will prepare and provide an Extreme Weather Conditions Strategy document at the time of occupation, which will be secured by condition.

## 21.15 Sustainable Design and Construction

21.16 The Sustainability Design and Construction Statement demonstrates the sustainability credentials for the proposed development and describes how the applicable sustainability policies and standards can be met by the proposed design. This is in line with the Greener Greenwich Supplementary Planning Document (SPD) (adopted 17th September 2014) and Mayor's Sustainable Design and Construction SPG (April 2014).

21.17 The Statement demonstrates that the development will meet good standards of sustainable design and construction including passive design, renewable technologies, energy efficient lighting with appropriate controls, Building Energy Management System (BMS), environmentally friendly and responsibly sourced materials where possible using the BRE's Green Guide to Specification targeting rating of A and with a global warming potential of 5 or less, waste management during construction and operation and improvement of biodiversity by enhancing the site's ecology, registration with Considerate

Constructors Scheme to achieve beyond best practice, minimisation of pollution through adoption of best practice for carbon footprint, air (dust), noise, light and water, adoption of Secure by Design principles and Working from Home facilities where appropriate, energy efficient white goods to reduce the unregulated energy and energy efficient lighting externally with appropriate controls and sensors to the whole development.

#### 21.18 Water

- 21.19 The Applicant has committed to incorporate water efficient sanitary fittings in all residential units targeting an internal water consumption rate of 105 l/p/s in line with Policy 5.15 of the London Plan (2016).
- 21.20 Water leak detection system on the main incoming supply and water meters to allow monitoring of mains water use will be provided.

#### 22.0 Ecology and Biodiversity

- 22.1 The landscape information provided demonstrates that small planted areas in the form of 'woodland copse' and 'heathland' will be planted to the rear of the site at ground floor level. New trees are proposed on the first-floor communal courtyard to create a new tree canopy habitat and green roof and living walls are proposed to enhance the ecology for the site.
- 22.2 Specification for soft landscaped areas and maintenance plans for the first 12 months and first 5 years have also been provided.
- 22.3 The Council's Sustainability Officer requested the following be secured by conditions:
- An ecological report be submitted by a suitably qualified ecologist to demonstrate the measures that will result in a net increase in biodiversity.
  - A Phase I Habitat Survey.
  - Any clearance works be undertaken by an experienced ecologist in case protected species are present, and buildings inspected for signs of bat activity or presence immediately prior to any demolition works.
  - The calculation of the Urban Greening Factor for the proposed development to be provided in line with policy G5 of the Approved for Publication Draft London Plan.
  - Details and cross sections regarding the green roof and walls.
  - Details of birds and bat boxes to be installed.
  - The percentage of native habitat species proposed for the site to be provided.

22.4 All of the above outstanding issues will be provided through appropriate conditions.

### **23.0 CIL**

23.1 The Community Infrastructure Levy (CIL) applies to all developments which meet a certain floorspace threshold, and is a tool used by local authorities to help deliver important infrastructure to support the development of an area. CIL is payable on all developments which create 100 sqm of net additional floorspace, or developments which create a new residential unit, is chargeable only on additional floorspace created, and is indexed to take into account inflation and changing build costs.

23.2 The Royal Borough of Greenwich adopted its CIL Charging Schedule on the 6<sup>th</sup> April 2015, and this sets out that CIL is payable at a rate of £70 per sqm for Zone 1 residential floorspace and £40 per sqm for Zone 2. In this instance the site falls within Zone 2.

23.3 In February 2019 the London Mayor adopted a new charging schedule (MCIL2) to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2. MCIL2 formally came into effect on 1st April 2019. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £25 per square metre.

23.4 The development would be CIL liable.

### **24.0 Legal Agreement**

24.1 Policy IM1 of the Royal Greenwich Local Plan sets out that all qualifying developments will provide for the infrastructure, facilities, amenities and programmes that are considered necessary to support and serve the development and offset any harm. When applicable, this is in addition to the Community Infrastructure Levy.

24.2 The development of this site will require a legal agreement, and the following Heads of Terms have been agreed between the Royal Borough of Greenwich and the applicant:

- Affordable Housing Provision of:
  - A £200,000 payment in lieu of on-site provision of affordable housing; and
  - Early review mechanism to ensure that the scheme delivers the maximum amount of affordable housing and maximum S106

contributions required to achieve a policy compliant scheme if not commenced within two years.

- Highways
  - A £12,000 towards Plumstead Good Growth public realm improvements
    - Payment to include alterations to the rear crossover and improvements to adjacent pavements
  - A £300 contribution towards cycle training consistent with the Council's Cycling Strategy and SPD requirements.
  - A commitment to extending existing car club (nearest on-street car club spaces are in Walmer Terrace), with the first 5 years of membership paid by the developer in line with SPD requirements.
  - Travel Plan
  - Construction Travel Plan
- Employment Training contribution including GLLAB
  - A £16,000 financial contribution and compliance with the Considerate Contractors Scheme
- Sustainability
  - Carbon offset payment of £28,443
  - Future connection to a qualifying heating network
  - Renewable / low carbon energy monitoring
  - GLA Be Seen Energy Monitoring
- Monitoring and Legal Costs

## **25.0 Conclusion**

25.1 The proposed development is considered acceptable with regard to design and would provide a good standard of accommodation for future occupiers. The development is also considered to have an acceptable impact on neighbouring amenity and the local highway system. Whilst on-site affordable housing would not be provided, following a thorough viability assessment it has been concluded that the maximum possible off-site contribution has been secured.

25.2 Based on the above, it is therefore recommended that permission be granted for application reference 19/1920/F, in line with Section 1 of this report.

### **Background Papers:**

Planning (Listed Building and Conservation Areas) Act 1990

National Planning Policy Framework (2019)

The London Plan (2016)

The Approved for Publication Draft London Plan (2020)

Royal Greenwich Local Plan; Core Strategy with Detailed Policies (2014)

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