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| <b>PLANNING BOARD</b> | <b>Agenda Item: 8</b>          |
| <b>6 July 2021</b>    | <b>Reference No: 21/0585/F</b> |

**Applicant: London South East Colleges (LSEC) and London and Quadrant (L&Q)**

**Agent: BPTW (Jane Richardson)**

|   |  |
|---|--|
| <b>Site Address:</b><br>London South East Colleges, 95<br>Plumstead Road, Woolwich, London,<br>SE18 7DQ | <b>Ward:</b> Glyndon<br><br><b>Application Type:</b> Full Planning<br>Permission |
|---|--|

## **I. Recommendation**

I.1 That full planning permission be GRANTED for:

Demolition of existing buildings and construction of a mixed use, residential (Use Class C3), education (Use Class F.1) and commercial (Use Classes E/F.1/F.2) development together with associated landscaping, play space, access, refuse and recycling storage, car and cycle parking, public realm improvements and associated works.

I.2 Subject to the following:

- (i) Referral of the application to the Mayor of London as required under the terms of The Town and Country Planning (Mayor of London) Order 2008;
- (ii) The conditions (Appendix 2) to be detailed in the notice of determination; and
- (iii) 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 (see section 21).

The authorisation of 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), where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice;

- (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; and
- (c) Consider, in the event that the Section 106 Agreement has not been completed within three (3) months of the date of the Planning Board resolution, whether permission should be refused on the grounds that the agreement has not been completed within the appropriate timescale, and that the proposals are unacceptable in the absence of the recommended planning obligations. If, on this basis, the Assistant Director for Planning & Building Control considers it appropriate to determine the application with reasons for refusal, these will include the following:

In the absence of a legal agreement to secure Affordable Housing, financial and non-financial contributions including for Employment, Skills and Training, Highways Infrastructure, Off-Site Play Facilities and Carbon Offsetting, 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 H4, E11, T1, S4, SI 2, and DFI of the London Plan (2021), Policies H3, E1, EA(c), IM1, IM4, IM(a) and IM(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), and the Planning Obligations (s106) Guidance SPD (2015).

## **2. Executive Summary**

- 2.1 The proposal is a residential-led, mixed use development comprising of the demolition, and subsequent redevelopment of the London South East College campus to provide a new fit-for-purpose college in the north-west corner and a ground floor commercial unit in the north-east corner, with the remainder of the site proposed as residential units, comprised of 294 flats. The development would make provision for 148 affordable homes (50.4% by unit and 51.9% by habitable room), and therefore significantly exceeds the 35% threshold required to benefit from the fast-track route in the Mayor's Viability SPG and the minimum target of 35% set out in the Local Plan. Of these 148 affordable dwellings, the proposal includes 72 London Affordable Rent (LAR) dwellings and 76 Shared Ownership (S/O) dwellings, which comprise 48.6% and 51.4% of the total affordable housing provision respectively, and 24.5% and 25.9% of the whole development respectively.
- 2.2 The total floorspace of the college buildings is currently 10,046m<sup>2</sup>, and as a result of the proposal, this would reduce to 5,486m<sup>2</sup>, a loss of 4,560m<sup>2</sup> (equivalent to 45%). However, the application material demonstrates that

most of the existing buildings date from the 1960s and are in poor condition, with LSEC currently using only 2,310m<sup>2</sup> of the existing teaching space, which equates to 23%, because 71% of the existing floorspace is either in need of upgrades or is inoperable.

- 2.3 The proposed replacement college, whilst occupying a smaller footprint and having a reduced overall size, would be designed to complement the existing and proposed teaching methods, moving towards a more digital future. The supporting information further demonstrates that as a result of redevelopment, the replacement college would be able to serve more students, and would allow for the college to grow, both in terms of the number of students who can attend, but also by expanding the range of courses offered, thereby increasing education choice for higher and further education within the borough.
- 2.4 The residential elements of the proposal would occupy the north-east corner and the southern part of the site, with the creation of a new east-west road through the centre of the site. The overall height, scale and massing are considered to be acceptable for their context, noting that part of the site is covered by a tall building designation, and having regard to the need to optimise development opportunities from brownfield sites. Moreover, whilst the proposal would introduce tall buildings into an area generally characterised by low to mid-rise buildings, because of the variation in heights and the sympathetic materials proposed, it is considered that the proposal would have a beneficial impact on the surrounding area in townscape terms, reinforcing the spatial hierarchy of the area and providing a local focal point to mark the civic presence of the site.
- 2.5 The functional and environmental impacts of the tall building have been considered, in accordance with Policy D9 of the London Plan, and it is considered that the proposal, subject to mitigation would not result in significant adverse impacts on surrounding residential properties or the public realm. Moreover, whilst there would be some loss of light to neighbouring residential properties, this would not lead to unacceptable living conditions for these properties as a whole and overall impacts on neighbours are considered to be low.
- 2.6 The residential element of the proposal would be car-free, except for blue badge holders for which 9 car parking spaces would be provided on-site, within the new east-west road, and on Invermore Place. Noting the very high PTAL, this is considered acceptable. 12 spaces are proposed for use by the college, comprising of 10 standard car parking spaces on New Street, a dedicated inset parallel bay for larger vehicles and one blue badge space on Invermore Place (noting that the spaces on Invermore Place could be used by

any blue-badge holder at any time). This represents a significant reduction in the number of on-site parking provision, and it is considered that this represents an appropriate level of provision which would not hinder or prohibit the college from functioning whilst also discouraging excessive car use when it is not required.

2.7 This application is considered to provide a number of planning benefits including a high provision of affordable housing together with improvements to teaching facilities within the borough, whilst making efficient use of a brownfield site in a highly sustainable location. As such, this application is recommended for approval.

### 3. **Summary**

3.1 Detailed below is a summary of the application:

| <b>The Site</b>   |  |
|---|--|
| Site Area (m <sup>2</sup> )   | 0.99 ha (9,900 m <sup>2</sup> )  |
| Local Plan Allocation (adopted 2014)  | No   |
| Draft Local Plan – Site Allocation Proposed Submission (published for consultation February 2021) | No   |
| Heritage Assets   | Located between Villas Road and Invermore Place, the site is close to the boundary of the Royal Arsenal Conservation Area and is within the setting of two listed structures; Royal Arsenal Middlegate House and Royal Arsenal Middlegate with its attached western boundary wall. |
| Tree Preservation Order   | No   |
| Flood Risk Zone   | Zone I (lowest risk)   |

| <b>Proposed Building</b> |                            |
|--------------------------|----------------------------|
| <b>Building heights</b>  |                            |
| College Building         | 5 storeys<br>33.7 metres   |
| Block A1                 | 10 storeys<br>43.83 metres |
| Block B1                 | 7 storeys<br>35.51 metres  |

|                              |                                |
|------------------------------|--------------------------------|
| Block B2                     | 5 storeys<br>23.81 metres      |
| Block B3                     | 13 storeys<br>50.96 metres     |
| Block B4                     | 5 storeys<br>28.31 metres      |
| Block B5                     | 7 storeys<br>35.81 metres      |
| Floor area (m <sup>2</sup> ) | 31, 148.9 m <sup>2</sup> (GIA) |

| <b>Housing</b>                            |  |             |
|---|--|-------------|
| Housing provision                         | No. of dwellings   | 294         |
|   | No. of Habitable rooms   | 822         |
| Dwelling Mix<br>number (%)                | Studio (1-bed / 1-person)  | 17 (5.8%)   |
|   | 1-bed / 2-person   | 89 (30.3%)  |
|   | 2-bed / 3-person   | 66 (22.4%)  |
|   | 2-bed / 4-person   | 59 (20.1%)  |
|   | 3-bed / 5-person   | 63 (21.4%)  |
| Housing Standards                         | Complies with Technical housing standards – nationally described space standard and London Plan standards? | Yes         |
| Affordable Housing / Tenure Split by unit | Overall Affordable Housing   | 148 (50.4%) |
|   | London Affordable Rent   | 72 (24.5%)  |
|   | Shared Ownership   | 76 (25.9%)  |
|   | Private Sale   | 146 (49.6%) |

| <b>Non-Residential Uses</b> |                                 |                               |
|-----------------------------|---------------------------------|-------------------------------|
| Existing Use(s) (GIA)       | FI (a) - Education              | 10,046 m <sup>2</sup>         |
| Proposed Use(s) (GIA)       | FI (a) - Education              | 5,486 m <sup>2</sup>          |
|                             | E/F.1/F.2 (Flexible)            | 325 m <sup>2</sup>            |
|                             | C3 – Residential                | 25, 011 m <sup>2</sup>        |
| Employment                  | Existing Number of jobs         | 58 Full Time Employment (FTE) |
|                             | Proposed number of jobs on site | 58 Full Time Employment (FTE) |

| <b>Transportation</b> |   |   |
|-----------------------|---|---|
| Car Parking           | No. existing car parking spaces               | 79  |
|                       | No. Proposed Car Parking Spaces (college)     | 11 + minibus space                            |
|                       | No. Proposed Car Parking Spaces (residential) | 9   |
|                       | Proposed Residential Parking Ratio            | 3%  |
| Cycle Parking         | No. Existing Cycle Parking                    | 23  |
|                       | No. Proposed Cycle Parking                    | 645   |
|                       | Complies with policy                          | No, but would be addressed through condition. |
| Public Transport      | PTAL Rating                                   | 6a  |

| <b>Sustainability / Energy</b> |                                       |
|--------------------------------|---------------------------------------|
| BREEAM Rating                  | Outstanding/Excellent                 |
| Carbon Emission Reduction (%)  | 47% (equal to 169 tonnes of CO2/year) |

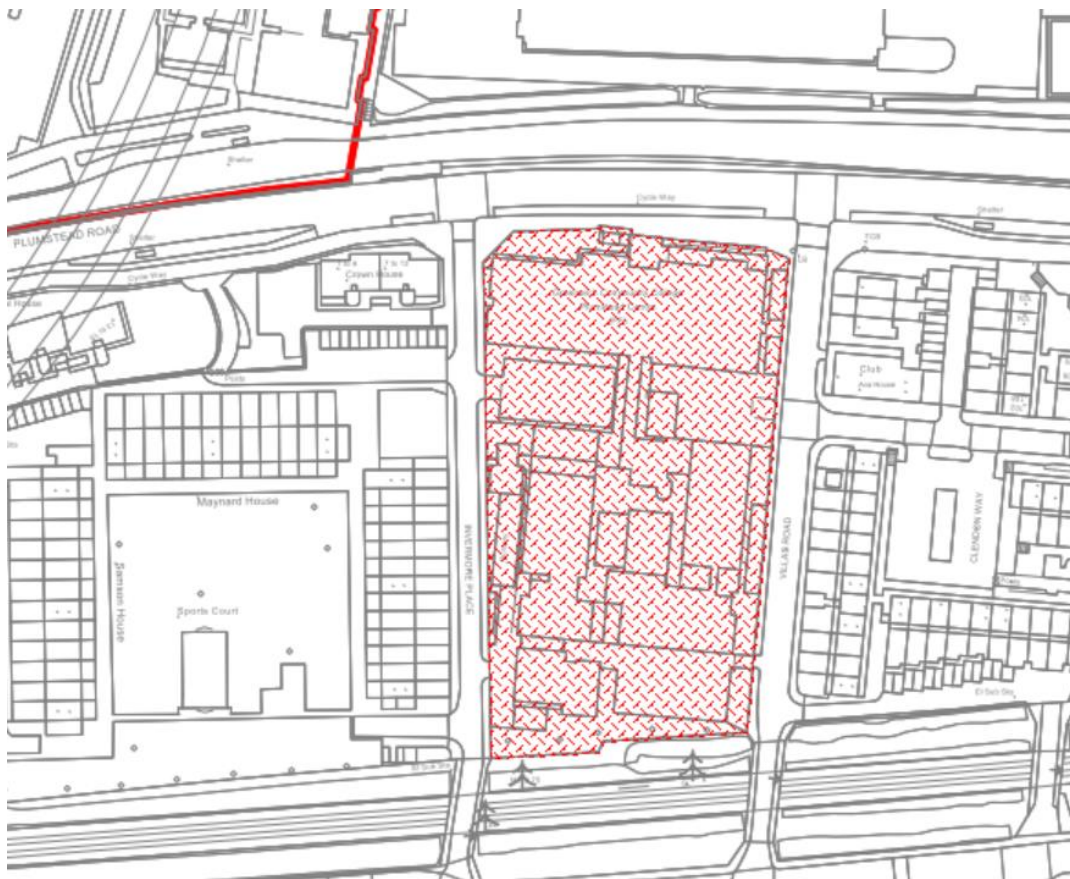
| <b>Public Comments</b>          |   |
|---------------------------------|---|
| Number of Representations       | 3   |
| Number of Objections            | 2   |
| Number in Support               | 1   |
| Material Considerations Raised: | <ul style="list-style-type: none"> <li>- Proposal will improve quality of life and increase opportunities</li> <li>- Mixed use scheme is supported</li> <li>- Proposal will attract further investment in the local area and encourage growth</li> <li>- Insufficient parking provision</li> <li>- Increase in local traffic</li> <li>- Loss of natural light to neighbouring properties</li> <li>- Low water pressure in the area</li> </ul> |

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>- Potential for increase in anti-social behaviour</li> <li>- Increase in noise pollution</li> <li>- Increase in air pollution</li> </ul> |
|--|---|

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

3.3 The application is considered to be acceptable and is recommended for approval as per section I of this report.

### **Site Location Plan**



## **4. Site and Surroundings (in detail)**

4.1 The application site comprises a broadly rectangular plot of land, sited to the south of Plumstead Road, to the west of Villas Road, to the north of a railway line connecting Woolwich and Plumstead and to the east of Invermore Place. The 0.99 hectare plot (9,900m<sup>2</sup>) is currently in use as a college, providing further education for 16-18-year olds, predominantly offering vocational courses, as well as providing adult education services and some higher education programmes.

- 4.2 The broadly rectangular plot is slightly wider at its northern end, adjacent to Plumstead Road, and tapers to the south towards the railway line, which forms the southern boundary of the site. The application site is dominated by hardstanding and comprises three main buildings which are interconnected by a raised walkway, with a total combined floorspace of approximately 10,000 m<sup>2</sup>. These three buildings are all of a similar height, being two or three-storeys high, with the most recently erected building occupying the north-west corner of the site whilst the original buildings occupy the north-east corner and the southern half of the site.
- 4.3 The application site lies approximately 480 metres west of the Plumstead District Centre boundary, and 75 metres east of the Woolwich Town Centre boundary, with Plumstead Train Station approximately 10 minutes' walk and Woolwich Arsenal Train and DLR Stations 5 minutes' walk from the site respectively. Consequently, the site has a Public Transport Accessibility Level (PTAL) of 6a (second best), where the score ranges from 0-6b, which equates to an excellent level of public transport availability.
- 4.4 The surrounding area is predominantly residential in its character, with prevailing building heights of three and four storeys, although it is recognised that 1-5 Villas Road (odds), opposite the north-east corner of the application site are two storeys in height and building heights on Walmer Terrace to the south reach five storeys. It is further recognised that the land to the north of the application site, on the opposite side of Plumstead Road, is in use for industrial purposes, with the streetscene characterised by large, low-rise industrial warehouses and sheds. However, owing to the high intensity usage of Plumstead Road as a main arterial route for vehicles, further recognising that Plumstead Road is a dual carriageway and hence is four lanes wide (including a central verge), it is considered that Plumstead Road acts as a barrier which both physically and visually separates the northern and southern sides.
- 4.5 To the south of the site, on the opposite side of the railway line, is Glyndon Park, designated as a community open space, which is used for recreational activities by the general public, primarily serving the Glyndon Estate. It is also noted that the development to the west is arranged around a central green courtyard and the railway sidings are designated as a site of importance for nature conservation as they are used as a green corridor for local wildlife.

## **5. Relevant Planning History**

- 5.1 11/2102/A – Installation of One Internally Illuminated BT Kiosk Advertising Panel. **Approved** on the 24<sup>th</sup> October 2011.



- 5.2 11/2681/A – Installation of an internally illuminated sign. **Approved** on the 16<sup>th</sup> December 2011.
- 5.3 12/2289/F – Installation of a temporary modular building to provide two classrooms. **Approved** on the 20<sup>th</sup> November 2012.
- 5.4 12/1401/RT – Renewal of extant planning permission dated 2nd April 2007 (Ref: 07/0233/RT) for a pre-fabricated cabin for use as a Creche. **Approved** on the 6<sup>th</sup> August 2012.
- 5.5 16/0564/A – Consent to display 4 x banners on the front elevation. **Approved** on the 13<sup>th</sup> May 2016.
- 5.6 19/4152/EIA – Environmental Impact Assessment (EIA) Screening Opinion under Regulation 6 (1) and (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 is sought for the demolition of the existing buildings and structures and construction of a new building to provide up to 6500 m<sup>2</sup> of non-residential floorspace (Use Class D1), up to 350 m<sup>2</sup> of flexible commercial floor space (A1/A2/B1/D1/D2) and up to 320 residential dwellings (Use Class C3) with associated landscaping, access including the construction of a new road, play space, refuse storage, parking and public realm. It was concluded that an **Environmental Impact Assessment was NOT required** by decision notice issued on the 10<sup>th</sup> January 2020.
- 5.7 20/1111/F – External alterations to existing building including installation of new entrances and a canopy on the south elevation. **Approved** on the 22<sup>nd</sup> December 2020.

## **6. Proposals (in detail)**

- 6.1 The current application seeks full planning permission for the following:

“Demolition of existing buildings and construction of a mixed use, residential (Use Class C3), education (Use Class F.1) and commercial (Use Classes E/F.1/F.2) development together with associated landscaping, play space, access, refuse and recycling storage, car and cycle parking, public realm improvements and associated works.”

- 6.2 The proposal first seeks to demolish all existing structures on the site, totalling 10,046 m<sup>2</sup> of internal floorspace, however it is noted that submitted building assessments demonstrate that the majority of the site is unsuitable for use with only 23% of the existing floorspace used by the college, and this usable area further requires upgrade works to align with modern teaching methods.

- 6.3 Following demolition of the existing buildings, it is proposed that a replacement college, with a Gross Internal Area (GIA) of 5,486 m<sup>2</sup> is built, proposed to occupy the north-west corner, with the remainder of the site given over to residential uses, comprising 294 dwellings. A small commercial, business or community unit with a GIA of 325 m<sup>2</sup> is proposed to front onto Plumstead Road with a flexible use sought (but which excludes retail, restaurant and light industrial uses).
- 6.4 The proposed replacement college, whilst occupying less total internal floorspace than the existing college, would be able to offer the same number of education places for prospective students, and is designed to allow for future growth, to allow the college to increase its capacity (in terms of student numbers) or increase the number of courses available, thereby increasing further-education choice in the local area. The supporting information sets out that the proposed redevelopment would facilitate significant increases in the provision of T-Level work placements and study programmes (as an alternative to A-Levels), apprenticeships pathways, English as a second or foreign language and courses for special educational needs and disability (SEND). The redevelopment would further allow the application site, one of eighteen campuses for London South East Colleges (LSEC), to become consistent with the digital framework applied across their network, with the intention, in partnership with the Digital Greenwich (the Royal Borough of Greenwich's in-house team) to develop and take forward the Mayor's and Greenwich's smart city strategy with a focus on digital skills.
- 6.5 The proposed residential development would comprise of 17 one-bedroom one-person studio flats (5.8%), 89 one-bedroom two-person flats (30.3%), 66 two-bedroom three-person flats (22.4%), 59 two-bedroom, four-person flats (20.1%), and 63 three-bedroom, five-person flats (20.4%). The proposal includes provision of 148 affordable dwellings, totalling 50.4% of the overall scheme, with 72 dwellings to be provided as London Affordable Rent (LAR) and 76 to be Shared Ownership (S/O) dwellings, and therefore the proposal exceeds the policy target of 35% affordable housing provision (by unit) set out in the Local Plan. The proposal also exceeds the 35% threshold (by habitable room) set out in the Affordable Housing and Viability SPG and the proposal therefore benefits from the "fast track route" and an assessment of Financial Viability is not required.
- 6.6 The proposed development would be arranged into two parts, visually and physically separated by the introduction of a new internal street (indicatively shown as New Street), which would connect Invermore Place and Villas Road, and provide on-street parking for the college and residential uses.

- 6.7 The northern half of the site, facing towards Plumstead Road, would be occupied by the replacement 5-storey college in the north-east corner, and a 10-storey residential block (Block A1) in the north-west corner, both connected by a single-level podium which spans the full width of the plot. At first floor level and at ground floor level behind the podium (on New Street), amenity space is provided at ground and first floor level between the college and Block A1.
- 6.8 The southern part of the site comprises residential uses only and is arranged as a continuous 'U' shape around a central courtyard garden facing south, with a generally symmetrical appearance in terms of its layout, heights and massing. The tallest part of the proposal is the central tower (Block B3), which is 13-storeys with 10-storey 'shoulders', and Block B3 is flanked on both sides by 5-storey blocks (Blocks B2 and B4), which rise to 7-storey Blocks to the south facing Glyndon Recreational Park (Blocks B1 and B5).
- 6.9 The proposed materials vary site-wide, but generally employ brick to give the overall development a sense of continuity. The college building has more expressive architecture, particularly facing towards Plumstead Road, and proposes to use darker brick tones and metallic panelling to accentuate its appearance and provide a visual counterpoint to the proposed residential blocks, which are more consistent in terms of their material palette with the surrounding built form.
- 6.10 As set out above, the application site is one of eighteen campuses operated by LSEC, but operates as a single organisation sharing resources, staff, services, equipment and facilities, and provides transport options where students have special educational or mobility needs, and the supporting information outlines that the proposal seeks a reduction in the number of on-site parking spaces from 87 to 21.
- 6.11 The residential element of the scheme would be car-free, except for blue badge parking provision, which will be available for 3% (9) of the total residential dwellings from the outset of occupation, with 6 spaces provided on New Street and 3 provided on Invermore Place. 12 spaces are proposed for use by the college, 10 standard car parking spaces on New Street, a dedicated inset parallel bay for larger vehicles (e.g. minibus) and one blue badge space on Invermore Place (noting that the spaces on Invermore Place could be used by any blue-badge holder at any time).
- 6.12 The proposal also includes provision of 39 long-stay and 70 short-stay cycle spaces for the college, 529 long-stay and 7 short-stay cycle spaces for the residential elements and 5 long-stay and 4 short-stay cycle spaces for the commercial unit. The proposed cycle facilities have been designed to adhere

with the London Cycling Design Standards where applicable, and up to 5% of cycle spaces will be provided in the form of accessible cycle spaces (appropriately spaced Sheffield stands) with the remainder of the spaces would be provided in the form of two-tier stands. The short-stay spaces would be provided in the form of Sheffield cycle stands within the public realm on Plumstead Road.

## 7. Consultation

7.1 Notification letters were sent to 373 properties on the 2<sup>nd</sup> March 2021, two (2) site notices were displayed outside the site on the 3<sup>rd</sup> March 2021 and a press notice was published in the Greenwich Weekender on the 3<sup>rd</sup> March 2021.

### 7.2 **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>Officers comments</b>                 |
|----------------------------------|---|--|
| <b>Environment Agency</b>        | <p>We have reviewed the document 'Geo-environmental Site Assessment' by RSK (reference 1920420 R01(01) Rev 01 dated 27th March 2020). No elevated concentrations of ground contaminants were reported that would represent a significant risk to Controlled Waters (the site is located above a Secondary Aquifer). However, it is understood a that further, post-demolition ground investigation is to be undertaken.</p> <p>As such, no objection, subject to conditions being included.</p> | See recommended conditions (Appendix 2). |
| <b>Historic England (GLAAS)</b>  | The submitted archaeological desk-based assessment report has demonstrated that developments have occurred over the past 200 years across this site, with the conclusion that their cumulative impacts will have been widespread  | No further comments.                     |

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|   | <p>and significant when it is considered that any archaeology would be within 0.5-1.0m of the current land surface.</p> <p>Given the above, it is concluded that while the site had archaeological potential, that potential will have been removed by the sequence of historic developments.</p> <p>No further assessment or conditions are therefore necessary.</p>   |   |
| <b>London Fire Brigade</b>              | Requests that access for fire appliances under building regs and adequate water supply for firefighting be provided.  | Fire safety is discussed in section 15. See recommended conditions and informatives (Appendix 2). |
| <b>Met Police (Designing Out Crime)</b> | No objection subject to a condition for 'Secure by Design' details, and to include measures related to counter-terrorism.   | See recommended conditions (Appendix 2).  |
| <b>Thames Water</b>                     | <p>Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. (For Foul and Surface water for the Residential Element of the Site and Foul water for the College Element).</p> <p>Following initial investigations, Thames Water has identified an inability of the existing water</p> | The suggested conditions have been included (see Appendix 2).                                     |

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|  | <p>network infrastructure to accommodate the needs of this development proposal, and as such, a condition is recommended.</p> <p>Moreover, greenfield run-off rates from surface water discharge should be targeted and this should be controlled by condition.</p>   |  |
| <p><b>Transport for London (TfL)</b></p> | <p>The site is approximately 650m to the west of Plumstead railway station and 750m to the east of Woolwich Arsenal Thameslink railway and DLR station. The new Woolwich Elizabeth Line Station is located around 600m away. There are 11 bus service routes within a 640-walking distance of the site with 10 of those routes serving the Plumstead Road/ Villas Road bus stop 150 metres away. Consequently, the site has a high Public Transport Access Level (PTAL) of 6a (on a scale of 0-6b where 6b is the highest).</p> <p>The proposed development is to provide 12 operational car parking spaces for the educational unit which is not in compliance with policy T6 of the London Plan. Due to the PTAL of 6A the development should be car free, except the provision for disabled persons' parking spaces. Whilst we can understand the arguments put forward, we would expect management arrangements to be put in place to ensure that the use of spaces will be for operational purposes only, notably a mini bus shuttle service between campuses or similar travel.</p> | <p>Transport is discussed in section 17 of this report. See recommended conditions (Appendix 2).</p> |

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|  | <p>The layout of car parking at this site should take into consideration the movement of cycles in the area noting access to the cycle parking storage areas and the car parking spaces are both located on the east-west route.</p> <p>The proposed residential development is to be car-free, which in principle is welcomed. However, a permit free agreement to prevent future residents applying for parking permits should be secured through a Section 106 agreement and TfL would also encourage the Council to review their CPZ controls within this area.</p> <p>The development would require nine disabled persons' parking spaces for the residential, which is equivalent to three per cent of residential dwellings having access to such parking from the outset. However, clarity is sought as the drawings demonstrate 10 disabled person parking spaces whilst the Transport Assessment states nine. In either circumstance, a Parking Design and Management Plan should be secured through condition detailing how further parking spaces could be provided as and when demand arises be these on or off site. It is unclear whether any disabled persons' parking is to be provided for the education use. In line with policy T6 of the London Plan, there should be five percent of the total car parking provision and as a</p> |  |
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|  | <p>minimum one disabled persons' parking space.</p> <p>At least 20 per cent of car parking should have active electric vehicle charging provision, with passive provision for all remaining spaces. However, it is encouraged that all disabled persons' and essential operational parking spaces have active provision from the outset.</p> <p>The proposed development is to provide 529 long-stay and 7 short stay cycle parking spaces are proposed for the residential element and 39 long-stay and 70 short-stay for the education element. Whilst the quantum is largely in compliance with the minimum standards identified within Policy T5, an increase in the quantum of short-stay cycle parking spaces by one space for the residential development is required. The location of short stay parking within the public realm in an easily accessible location is welcomed. All cycle parking should be designed in line with London Cycle Design Standards (LCDS), as also required by policy T5.</p> <p>Further work is required to identify if any other improvements are needed to the local walking and/or cycling networks. including links to bus stops and rail stations. In particular the applicant is encouraged to explore whether a cycling link can be established to the north Plumstead Road to connect with the Thames Path</p> |  |
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|   | <p>located 550 metres to the north as access currently from this location is limited.</p> <p>It is welcomed that the applicant has already highlighted areas of potential improvement but following the further work required as set out above, the ultimate mitigation package should be agreed with the Council, and then secured by condition or legal agreement as necessary. This mitigation would be in line with policy T2 and T4 of the London Plan. The package should support achieving a strategic modal shift towards sustainable and active travel.</p> <p>A multi-modal trip generation assessment has been provided. Although there are shortfalls within the assessment, it is considered the development will not have a significant impact on the surrounding public transport network.</p> <p>A Parking Design Management Plan, Delivery and Servicing Plan, Construction Logistics Plan and Travel Plan should be secured along with a CPZ contribution and a permit free agreement.</p> |  |
| <p><b>Greater London Authority – Stage I response (17<sup>th</sup> May 2021):</b></p> | <p>Principle of land uses: The proposed re-provision of enhanced educational uses and residential uses on this brownfield site with excellent access to public transport is strongly supported in principle. The provision of a small-scale commercial, community or</p>   | <p>The application is referable to the Mayor of London and their Stage I response has been considered during the course of the application. Where relevant, additional</p> |

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|  | <p>learning use is also supported in strategic terms.</p> <p>Housing: 52% affordable housing by habitable room (50% by unit), split 51% London Affordable Rent and 49% shared ownership is strongly supported and could follow the Fast Track Route, subject to the Council confirming the tenure split is acceptable. An early stage review and the affordability of the units must be secured.</p> <p>Urban design: The proposed tall buildings are inappropriate in this location. The applicant must address the functional and environmental impacts of the tall buildings to allow officers to carry out a planning balance considering the public benefits of the scheme and other material considerations. The applicant should seek to increase the number of dual aspect units, improve the daylight to the remaining single-aspect units and addressing overheating concerns. Revised fire statements should be provided.</p> <p>Transport: Further justification for the proposed operational parking, an increase in cycle parking, information on enhancements to local cycling and walking routes and information on how the east-west route meets the Healthy Streets Approach are required. Appropriate transport conditions and obligations should be secured.</p> | <p>information has been requested to ensure the proposal complies with London Plan policy.</p> <p>The application would be referred to the GLA for a Stage 2 response following a resolution to grant or refuse at Planning Board.</p> |
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|  | Further information on air quality, energy, circular economy, water, urban greening and biodiversity are required. |  |
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### 7.3 Council Departments

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>Officers comments</b>  |
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| <b>Conservation Officer</b>                     | The submission has accurately identified the heritage assets affected by the development and demonstrated that its impact on the setting of these will be negligible. As such the proposals will cause no harm.   | It is agreed that the proposal will have a negligible impact on nearby heritage assets. This is discussed in further detail in section 14 of this report. |
| <b>Environmental Health (Noise)</b>             | In terms of the noise aspects – the details provided can generally be seen as satisfactory with acceptable noise levels predicted inside the development. The standard noise conditions would need to be applied.   | See recommended conditions (Appendix 2).  |
| <b>Environmental Health (Contaminated land)</b> | In principle, based on the assurances and accuracies provided in the RSK Report, March 2020, I concur with the recommendations of S.12.1.2, albeit – from a remedial perspective; but would require a soil cover of 600mm to be provided which should include a ‘marker/capillary membrane’. Please apply the standard RBG land condition for this development. | See recommended conditions (Appendix 2).  |
| <b>Highways and Transport</b>                   | The group educates c.13,000 learners and has approximately 3,500 staff across its 18 sites. It operates as a single organisation  | Transport implications are discussed in section 17 of the report,   |

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|  | <p>sharing resources, staff, services and facilities. As a result, the group share, move, travel and deliver a host of items and resource across the 18 sites. The existing campus provides a flexible range of learning courses for 1,879 learners currently enrolled. The existing site provides a total of 87 parking spaces associated with the college.</p> <p>Plumstead Road is a heavily trafficked classified road and bus route, subject to loading and waiting restrictions forming part of the Strategic Road Network. The side roads are local access roads and controlled as part of a CPZ. The nearest train station is Plumstead although the site is within walking distance of Woolwich Arsenal and DLR stations. It is also within walking distance of 14 bus routes and therefore has very good access to public transport with a PTAL of 6a. The CPZ operates Monday to Friday between 9am and 5.30pm but also allows short term parking on a metered basis. There are also some bays to the north in Walmer Terrace that operate Monday to Friday between 9.30 and 11am.</p> <p>In line with the new London Plan, policy T6 indicates that in areas of good access to public transport the starting position should be for developments to be car free with only parking provided for the disabled or occupational</p> | <p>however it is agreed that the proposed parking levels for both the residential and non-residential elements are acceptable, and would provide a good balance of discouraging private car use whilst not preventing the college from functioning to its optimal capacity.</p> <p>See recommended conditions (Appendix 2).</p> |
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|  | <p>requirements. It is indicated that no parking spaces are provided for the 294 residential dwellings other than for disabled, which would therefore be practically car free indicating most trips would be either by walking, cycling or public transport. Consistent with</p> <p>The Mayor's aim for 2041 for 80 per cent of trips in London to be made by active, efficient and sustainable modes (walking, cycling and public transport).</p> <p>While it is recognised that policy set out within the 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 users. While there is still some availability in the area, there is heavy demand for parking near the site. Parking on street is therefore considered to be at a premium during the day and additional demand will exacerbate existing problems for businesses and visitors. Given that some times of operation of the CPZ only operate for 1 ½ hours a day Monday to Friday, it is possible for some future residents to drive to work in the morning and return in the evening having missed the hours of operation.</p> <p>In order to prevent displaced parking occurring on street to the detriment of existing permit</p> |  |
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|  | <p>holders however, it is recommended that any permission granted should be conditional that new occupants are not eligible for parking permits in the CPZ. The cost of amending the Traffic Order is to be borne by the applicant. The car free nature would need to be secured by amending the CPZ which itself may need review and alteration of the times of operation.</p> <p>It is intended that a new road is to be constructed through the site to provide vehicular and pedestrian access. While the new road uses generally existing vehicular access points, in order to allow adequate turning movements, the accesses are widened slightly and will require existing parking bays in Invermore Place and Villas Road to be shortened slightly. The Traffic Order controlling the parking bays will require alteration at developer cost. The layout indicates 6 accessible parking spaces are provided for the residents and 11 standard car parking spaces formed along the new road for College use. Overall while the design has merit, the proposed road layout is not considered suitable for adoption. An additional 4 accessible car park spaces are provided in Invermore Place by amending the kerb line and re-providing the footway within the current site boundary. For this to be acceptable in highway terms, the</p> |  |
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|  | <p>new footway will require to be adopted and should be conditioned. The 4 spaces will be a new provision where there was previously no parking and not be solely for the College or residents use but as in highway will be for the use of anyone with a relevant badge. Overall, the amount of parking provided for the disabled complies with London Plan policy. The proposals indicate a significant net reduction in college parking facilities from 87 to 12 seeking to minimise college parking facilities to operational use only. The LSEC operate a car sharing scheme and has 4 pool cars, 4 minibuses and 4 transit vans.</p> <p>It is noted that the cycle spaces are to be provided through a combination of Sheffield stands and two-tier stands. While numbers are provided it is recommended that detail be addressed via a condition relating to cycle storage. It is noted that TfL seeks to extend Cycle Superhighway 4 (CS4) from Greenwich to Woolwich via Woolwich Road and a contribution should be sought towards this provision.</p> <p>Given the size of the development, it is proposed that contributions should also be sought in line with Planning SPD policy towards cycle facilities in the area, cycle training, Car Club and Public Realm improvement.</p> |  |
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|                       | <p>Proposed highway works should be subject to s38 and s278 agreements.</p> <p>No doors should open out over public highway.</p> <p>A Framework Delivery and Servicing Plan and a Framework Travel Plan are provided.</p> <p>Given the size of the proposal, it is recommended that a Construction Management Plan is secured via condition.</p>  |  |
| <p><b>Housing</b></p> | <p>Please can you state in the s106 that the LAR should be in accordance with (or no more than) Weekly Rent Benchmarks as defined by the GLA. We should also have a condition in the S106 that states that we should approve the Lettings Plan for the affordable rented units, and within that lettings plan we should see what rents they are proposing to charge &amp; approve/reject as necessary.</p> <p>The lower income levels for the shared ownership units to be marketed at for the first 3 months are £71,000 for one and two bed units and £88,000 for 3 bed units, and the shared ownership are targeted at people who live or work in the borough for the initial marketing period. The GLA guidance states that Borough restrictions can only last for 3 months, and following this the GLA threshold figures should be used.</p> | <p>The comments are noted and these requirements would be secured through the s106 agreement (see section 20).</p> |



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| <p><b>Occupational Therapist</b></p>          | <p>At this full planning stage, the access, approach and circulation for the college broadly meets the requirements for compliance. Much of the detailed information required to demonstrate compliance will need to be provided at submission of details stage</p> <p>This application should be conditioned to meet the requirements of Approved Document M Vol 2.</p> <p>There a number of key issues that need to be addressed, to ensure that that requirements can be met, including the external entrances and the minimum size of the habitable spaces. There are some areas of non-compliance related to bathroom layouts and door opening widths that need to be addressed at submission of details but compliance with M4(2) and M4(3) has largely been achieved and should be conditioned.</p> | <p>This is discussed in further detail in section 15 of this report and the recommended conditions have been included within Appendix 2.</p> |
| <p><b>Sustainability</b></p>                  | <p>Whilst the proposal has some areas which are not in accordance with the London Plan, where these requirements have not been met, conditions and/or s106 obligations can be used to resolve these issues.</p>  | <p>Energy, ecology and sustainability are discussed within section 19 of this report. See recommended conditions (Appendix 2).</p>           |
| <p><b>Tree Protection and Landscaping</b></p> | <p>They do not appear to have given any sizes for the replacement trees or species, although it is considered that the proposal would make a positive contribution to the area, retaining and increasing net tree coverage.</p>  | <p>See recommended conditions (Appendix 2).</p>  |

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|                             | This can be controlled by condition.   |  |
| <b>Urban Design Manager</b> | <p>The proposed positions and orientations of buildings and open spaces is not objected in design terms, as they create well defined street frontages and functioning hierarchy of public, communal and private spaces.</p> <p>The new street designed on the site is beneficial to improve permeability and walkability across the area and creates a desirable link between Perrott Street and Polthorne Grove. Some concern is expressed on the fact that no additional breaks have been designed in the U-shaped Building B on the southern side of the site, which would have defined a finer grain of buildings, facilitated the optimisation of dual aspect units and created additional visual permeability across the scheme, with appealing views from the street into the communal, green open-space with trees.</p> <p>An issue is raised on the concentration of car-parking on the new street and its limited integration with the soft landscape strategy for the site. A condition should be included for all outdoor spaces, to ensure that this point is addressed at the post-approval stage and attention is provided to the finishing and detailing of all outdoor pavements and proposed planting.</p> | <p>Scale, height and massing are discussed in section 14 of this report, including the impact of the tall building on the surrounding townscape.</p> <p>The quality of the residential environment is discussed in section 15 of this report. The conditions have been recommended (see Appendix 2).</p> |

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|  | <p>While the designed courtyard is relatively deep in comparison to its width (60m by 30m approximately), it is thoughtfully orientated to open up towards the southern natural light.</p> <p>The proposed landscape design for the courtyard with a high percentage of soft surface is considered acceptable in design terms and creates a visual connection with the green buffer of the railway and Glyndon Park. The scheme creates adequate active frontages at the street level. The designed dual-aspect units in Building B with direct access from the public realm are considered beneficial to activate the streetscape and create adequate thresholds with the private indoor and outdoor space.</p> <p>The proposed heights have been thoughtfully distributed across the site, in a way to create expressive and legible variations, mark focal points and mitigate as much as possible any unappealing monolithic feel across the scheme.</p> <p>The five storey high (equivalent to seven residential storeys) college and ten storey Building A would effectively mark the site approaching from eastern and western Plumstead Road.</p> <p>Their overall scale is considered to be within that of local landmarks and suitable to</p> |  |
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|  | <p>celebrate the educational uses designed on the site. They would create a legible gateway to Invermore Place and Villas Road, towards Glyndon Park. Some concern is raised on the deep footprint of Building A, exceeding 30 metres, which partially compromises the intended slender character of this tall block and would have some negative impact on the views approaching from eastern Plumstead Road.</p> <p>The designed thirteen storey block would create a legible landmark on long views from Glyndon Park.</p> <p>It would sit behind the designed mid-rise shoulder on Invermore Place and Villas, which would be beneficial to create some mediation with the surrounding context.</p> <p>Overall, the proposed massing is not considered as creating any severe negative impact on the surrounding context, visually and in townscape terms. It would improve the spatial coherence of the local urban-fabric, creating legible landmarks and facilitating wayfinding.</p> <p>Material samples for all appearing materials should be provided, including walls, roofs, windows and doors, sills and lintels, balconies, balustrades, visible pipes, grids and louvers, outdoor pavements, stairs, gates, boundary walls and fences.</p> |  |
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|                       | <p>The scheme is considered to be of acceptable architectural quality. The major concern regards the internal layout of the scheme, which is organised around unappealing internalised corridors and results into a substantial number of single aspect units and not the most engaging and appealing sequence of arrival to the individual residential units.</p> <p>The overall bulk of Building B is also reason for some concern, as it could have been broken into smaller footprints, which would have also had a positive effect on the percentage of dual aspect units.</p> <p>These issues should be carefully weighed against the identified public benefits provided by the scheme, such as affordable housing and the improvement to the college, prior to recommendation.</p> |  |
| <b>Waste Services</b> | We are satisfied with the waste proposals, and a waste management strategy should be secured by condition.   | See recommended conditions (Appendix 2). |

#### 7.4 Amenity Groups

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

| <b>Details of representation</b>   | <b>Summary of Comments</b> | <b>Officers comments</b> |
|------------------------------------|----------------------------|--------------------------|
| <b>Positive Plumstead</b>          | No response received.      | No comment.              |
| <b>Friends of Plumstead Common</b> | No response received.      | No comment.              |

## 7.5 Local Residents and Businesses

A total of two (2) objections and one (1) letter in support of the application were received following consultation. A summary of the consultation responses received from local residents and businesses are set out in the table below:

| Summary of Comments   |
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| <p><b>Local Residents:</b></p> <p><u>Comments in support of the proposal:</u></p> <ul style="list-style-type: none"><li>- Proposal will improve quality of life and increase opportunities</li><li>- Mixed use scheme is supported</li><li>- Proposal will attract further investment in the local area and encourage growth</li></ul> <p><u>Objections to the proposal:</u></p> <ul style="list-style-type: none"><li>- Insufficient parking provision</li><li>- Increase in local traffic</li><li>- Loss of natural light to neighbouring properties</li><li>- Low water pressure in the area</li><li>- Potential for increase in anti-social behaviour</li><li>- Increase in noise pollution</li><li>- Increase in air pollution</li></ul> |

7.5.1 The concerns raised, where relevant, are discussed within the following sections of this report.

## 8. Planning Context

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

- **National Planning Policy Framework (NPPF – 2019)**
- **National Planning Practice Guidance (NPPG)**
- **Technical Housing Standards – Nationally Described Space Standard** (Department for Communities and Local Government – March 2015)
- **Planning (Listed Buildings and Conservation Areas) Act (1990)**
- **The London Plan (2021)** - Full details of relevant policies refer to appendix 3.

- **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Local Plan” – 2014)** - Full details of relevant policies refer to appendix 3.
- Full details of relevant SPD / SPG Documents refer to appendix 4.

## **9. Environmental Impact Assessment**

- 9.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 sets out a procedure for identifying projects which should be subject to an Environmental Impact Assessment, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects. The aim of an Environmental Impact Assessment (EIA) is to protect the environment by ensuring that a local planning authority is able to decide whether to grant planning permission in the full knowledge of the likely significant effects, and to take this into account in the decision-making process.
- 9.2 The requirement for an EIA is based on the likelihood of significant environmental effects arising from the development. There are three stages to the EIA process for a local planning authority to consider a proposal; Screening, Scoping, and the assessment of an Environmental Statement (ES). A Screening Opinion is used to determine whether a proposal falls within the remit of the EIA Regulations and therefore requires an EIA to be carried out, and if found to be required, a Scoping Opinion is used to determine the extent of the issues to be considered within the ES.
- 9.3 A Screening Opinion was requested on the 2<sup>nd</sup> December 2019 in relation to a development of up to 6500 m<sup>2</sup> of non-residential floorspace (Use Class D1), up to 350 m<sup>2</sup> of flexible commercial floor space (A1/A2/B1/D1/D2) and up to 320 residential dwellings (Use Class C3) with associated landscaping, access including the construction of a new road, play space, refuse storage, parking and public realm. A formal response was issued on the 10<sup>th</sup> January 2020 stating that the proposed development is unlikely to have significant environmental impacts and therefore does not constitute EIA development.

## **10. Material Planning Considerations**

- 10.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application (Ref: 21/0585/F):
- Principle of development (Section 11);
  - Residential Mix (Section 12);
  - Affordable Housing (Section 13);
  - Design, Townscape and Heritage (Section 14);

- Layout, Scale and Massing
- Conservation and Heritage Impacts
- Detailed Design and Architecture
- Quality of the Residential Environment (Section 15);
  - Internal Space and External Amenity
  - Play Space
  - Daylight, Sunlight and Outlook
  - Noise, Air Quality and Microclimate
  - Accessible Homes
  - Fire Safety
  - Secured by Design
- Impact on the amenity of nearby properties (Section 16)
  - Daylight and Sunlight
  - Outlook
  - Noise and Disturbance
- Transport and Access (Section 17);
- Waste and Recycling (Section 18);
- Sustainability, Energy and Ecology (Section 19);
- Legal Agreement (Section 20);
- Public Sector Equality Duty (Section 21);
- Conclusion and Planning Balance (Section 22)

## **11. Principle of Development**

- 11.1 The National Planning Policy Framework (NPPF) (2019) is a set of national guidelines from which the principles of modern planning are cascaded into local planning policy and is a material consideration in the determination of planning decisions. At the heart of the NPPF is the presumption in favour of sustainable development, which has three overarching interdependent objectives; economic prosperity, social inclusion and environmental enhancement.
- 11.2 Paragraph 59 of the NPPF, in regards to housing supply, states that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”*. At paragraph 80 in regard to economic growth the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.
- 11.3 Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy



living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. Paragraph 94 of the NPPF states that local planning authorities should proactively adopt a positive and collaborative approach to development that will widen choice in education.

- 11.4 Policy GG2 of the London Plan (Making the best use of land) states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres, as well as utilising small sites wherever possible. Sites which are well connected by existing or planned public transport should be prioritised, and options to intensify the use of land in well-connected areas to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling should be explored by applying a design-led approach to determine the optimum development capacity of a site.
- 11.5 Moreover, Policy GG4 (Delivering the homes Londoners need) sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered, must support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable and must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- 11.6 Policy GG5 (Growing a good economy) sets out that boroughs should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration whilst ensuring that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.
- 11.7 Policies D1 (London's form, character and capacity for growth) and D2 (Infrastructure requirements for sustainable densities) of the London Plan both require development proposals to have regard to the context of the surrounding area, including existing and proposed levels of infrastructure. Policy D2 further states that proposed densities should be proportionate to the site's connectivity and accessibility by walking, cycling and public transport to jobs and services.

- 11.8 Policy D3 of the London Plan (Optimising site capacity through the design-led approach) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, including existing and planned supporting infrastructure capacity. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 of the London Plan. In areas of comparatively low densities, incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way.
- 11.9 Policy H1 of the London Plan (Increasing housing supply) sets the 10-year housing targets for each London borough which places a 10-year housing completions target of 28,240 homes (starting in 2019/20 and continuing through to 2028/29). This equates to an average completion target of 2,824 homes a year, although Policy H1 makes clear that some variations in yearly targets will be acceptable as long as the overall delivery strategy for new homes is not compromised.
- 11.10 Policy S1 of the London Plan (Developing London's social infrastructure) sets out that proposals which provide high quality, inclusive social infrastructure (including education provision) which addresses a local or strategic need and supports service delivery strategies should be supported. Policy S1 further sets out that proposals which seek to make best use of land, through co-location of different forms of social infrastructure and the rationalisation or sharing of facilities, should be encouraged and supported, and proposals which result in the loss of social infrastructure in an area of identified need should only be allowed where there are realistic proposals for re-provision or the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.
- 11.11 Policy S3 of the London Plan (Education and childcare facilities) states that proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need and proposals for education facilities should be in accessible locations, with good public transport accessibility and access by walking and cycling.

- 11.12 Policy HI of the Royal Greenwich Local Plan sets out the housing targets for the plan period (2013 – 2028), which is to provide a minimum of 38, 925 net additional dwellings, which equates to a delivery of 2,595 new homes a year.
- 11.13 Policy CHI of the Local Plan (Cohesive Communities) states that the development of new and improved community facilities where there are identified local needs and where the development is in line with the Royal Borough's strategy for the provision of services should be supported. Policy CHI further advises that facilities must be easily accessible for all and be located in or on the edge of town or local centres unless a special need for a location elsewhere can be demonstrated.
- 11.14 The proposed development seeks to demolish the existing college and construct a replacement college in the north-west part of the site, but with a lower provision of overall floorspace, and to erect 294 dwellings across the remainder of the site. As such, the main considerations are the loss of education floorspace, the acceptability of the proposed residential land use, and the proposed mix of uses across the site.
- 11.15 At present, the college occupies the whole plot, and comprises a square-shaped 3-storey building in the southern part of the site and a part three, part four-storey (equivalent) building facing Plumstead Road in the northern part of the site, both connected by a two-storey walkway. The land around the buildings is largely hardstanding, and used for car parking, and part of the site is occupied by portacabins and a large garage/storage area in the south-west corner. The total floorspace of the college buildings is currently 10,046m<sup>2</sup>, and as a result of the proposal, this would reduce to 5,486m<sup>2</sup>, a loss of 4,560m<sup>2</sup> (equivalent to 45%).
- 11.16 Policy CH(a) of the Royal Greenwich Local Plan (Loss of Community Facilities) is therefore of relevance, which states that planning permission that would result in the loss of community facilities through change of use or redevelopment will only be granted where there is evidence that the loss would not create or add to a shortfall in provision for the specific community use (education) and alternative community facilities of a similar nature are provided locally in the area which that facility serves. Alternatively, if the proposal would enable the implementation of the Royal Borough's strategy for the provision of community facilities or the site is demonstrably unsuitable for continued use as a community facility, permission allowing its loss could be acceptable.
- 11.17 The supporting information submitted with the application, including the Condition Survey and Building Usage Analysis (Appendices 2 and 3 of the Planning Statement respectively) set out that the existing buildings are

demonstrably unsuitable for continued use and, if the proposed buildings were to be retained, would require significant levels of refurbishment, which would be likely to incur similar costs to wholesale redevelopment. The Condition Survey sets out that At present, whilst the college has a large footprint and a significant quantum of floorspace, most of the buildings date from the 1960s and are in poor condition, with LSEC currently using only 2,310m<sup>2</sup> of the existing teaching space, which equates to 23%. It is further noted that the existing layout, including the addition of ad-hoc extensions and buildings, is not conducive to effective modern teaching methods, with the buildings dating from the 1960s where different pedagogical styles were dominant, and the current layouts would not support the changes to the curriculum proposed by LSEC, towards a more digital curriculum.

11.18 The Condition Survey demonstrates that the majority of the site (71%) is either operational but with significant components requiring replacement, or inoperable, whilst the majority of the building components are life-expired and in critical condition with structural issues, making servicing challenging, and statutory compliance with non-planning regulations an issue. In turn, these issues lower the attractiveness of the college to prospective students and teachers, which lowers the value of the college to the local community and, over time, could lower education choice and availability (for further education) within the borough.

11.19 As set out above, despite the large footprint of approximately 10,000m<sup>2</sup>, only 2,310m<sup>2</sup> is currently in use with large areas of the site wasted, in various states of disrepair, and arranged in inefficient layouts which are not suitable for modern teaching methods. The proposed new college building would comprise of 35 teaching rooms, providing approximately 1,050 teaching sessions per week, and if the current operational timetable of the college were applied to the proposed development, this would require 65% of the proposed college to be utilised over a week, which therefore demonstrates that the proposal would not lead to a loss of teaching facilities, and further demonstrates that the proposed college could accommodate further growth in the curriculum, and/or an increase in the number of students, noting that significant growth by the college is planned, and the proposal will increase teaching capacity by 15%. Specifically, LSEC are seeking to increase qualifications by 30% by 2027 (compared to the 2017/2018 baseline), increase apprenticeship provision from 45 to 264 apprenticeships a year, and will operate at an improved efficiency ratio, due to appropriately designed teaching spaces that maximise flexibility and minimise non-usable floorspace. It is intended that the new modern facilities will attract increased apprenticeship placements and are designed around an employer-responsive curriculum to meet the key areas of employment growth in Greenwich, in line with the Mayor's Smart City Strategy and Digital Greenwich.

- 11.20 On this basis, it is considered that the proposed loss of college floorspace is acceptable and would not translate to a loss of education provision, and moreover is likely to improve local education provision through improvements to the quality of teaching facilities which in turn will allow the college to update its curriculum, teaching methods and generally improve efficiency.
- 11.21 It is further important to note that a phased programme of redevelopment is proposed by the applicant, to ensure that there is no disruption to education provision during the construction process, which will involve the northern part of the site (containing the proposed college and Block A1) seeing demolition and development first, with the existing students decanted into the southern building (which will need some minor refurbishments before its use), and then once the replacement college is complete, the southern half of the site would be demolished and redeveloped.
- 11.22 As it has been satisfactorily demonstrated that the existing facilities are unsuitable for long-term use, the proposed reduction in college floorspace would not lead to a loss of education provision, and the required floorspace (including accounting for future growth) can be satisfactorily accommodated within one building, it is considered that the proposed redevelopment and rationalisation of the existing college is acceptable and supported by both the London Plan and the Royal Greenwich Local Plan.
- 11.23 As set out above, the remainder of the site is to be redeveloped for residential uses (excluding the small commercial unit facing Plumstead Road) and is to be arranged in a 'U' shape around a south-facing central courtyard, except for Block A1 which is sited in the north-west corner adjacent to the proposed college.
- 11.24 The NPPF and Policy GG2 of the London Plan both seek to prioritise the development of brownfield sites (sites which have already been developed), over undeveloped sites, to ensure that the planning system contributes to an efficient use of land which has the least environmental impacts. Policy GG2 further sets out that brownfield sites in, or on the edge of, town centres should look to be developed first, especially where these sites have high access to public transport where proposals should seek to optimise the site's capacity in line with a design-led approach.
- 11.25 The site has excellent access to public transport, as evidenced by the Public Transport Accessibility Level (PTAL) of 6a, is within walking distance of national rail, DLR and bus services, and is located in a predominantly residential area on the south of Plumstead Road. The site, whilst falling outside of two town centre boundaries, is within walking distance of two town centres (Woolwich and Plumstead), both of which provide access to

local amenities and shops, with Glyndon Recreational Park immediately to the south of the site, on the opposite side of the railway cutting, providing convenient access to amenity and play areas.

- 11.26 Having considered the reduction in college floorspace to be acceptable (discussed above), it is considered that the proposed residential use of the site is acceptable and would make the most efficient use of the land (in accordance with Policy GG2), whilst also supporting the delivery of new homes (in accordance with Policy GG4).
- 11.27 The proposed scheme would introduce a significant quantum of residential development onto the site (294 dwellings), and whilst this is considered acceptable in land-use terms, Policy D1 of the London Plan requires proposals to respect the context of the surrounding area, whilst Policy D2 of the London Plan states that development should have regard to existing and proposed levels of infrastructure and that proposed densities should be proportionate to the site's connectivity and accessibility by walking, cycling and public transport to jobs and services. Proposals should further be considered in the context of Policy D3 of the London Plan which requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, with higher density developments promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, whilst in areas of comparatively low densities, incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way.
- 11.28 It is also important to consider the housing targets set out in Policy H1 of the London Plan and Policy H1 of the Royal Greenwich Local Plan, which respectively seek 2,824 and 2,595 net completions per year within the Royal Borough, one of the highest targets within London, and therefore requires development opportunities on all sites to be optimised.
- 11.29 The proposal would introduce 294 dwellings onto the site, which would make a significant contribution to the borough's housing targets and as discussed above, is considered to represent an optimal use of the site following demolition of the existing college buildings. The surrounding residential character and densities vary significantly, and due to the relatively open aspect of Plumstead Road and the park to the south, the proposed development would be read in the 3-4 storey immediate context of Invermore Place and Villas Road, but also the more distant contexts of the Glyndon Estate, which is predominantly low-rise but does include instances of taller buildings and in the context of emerging tall developments within Woolwich Town Centre, including the Spray Street Quarter and the Royal Arsenal.

11.30 As such, having regard to Policies D1, D2 and D3 of the London Plan, which specifically seek to support high-density development in locations with good access to local amenities and transport, and further support gradual intensification of areas of comparatively low density where this can be supported by local infrastructure, it is considered that the proposed quantum of development is acceptable, and would promote a transition to higher densities in the area, making efficient use of a brownfield site in a highly sustainable location.

11.31 On this basis, the proposal is considered to be acceptable in principle.

## **12. Residential Mix**

12.1 Policy H10 of the London Plan (Housing size mix) states that schemes should generally consist of a range of unit sizes, having regard to the requirement to deliver mixed and inclusive neighbourhoods, the need to deliver a range of unit types at different price points, the mix of uses, the range of tenures, the nature and location of the site, PTAL, the need for additional family housing and the role of one and two bed units in freeing up existing housing by providing an alternative to conversions and sub-divisions, with the aim of optimising a site's potential.

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

12.3 Policy H3 of the Greenwich Local Plan (Affordable Housing) requires developments of 10 or more homes, or within sites of 0.5 hectares or more, to provide a minimum of 35% affordable housing provision. The precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and the development, and affordable housing should normally be provided as 70% social/affordable rent and 30% intermediate, subject to an assessment of viability.

12.4 The application proposes the following unit mix:

|                            | London Affordable Rent | Shared Ownership   | Private Sale       | Total      |
|----------------------------|------------------------|--------------------|--------------------|------------|
| 1B1P                       | 0                      | 0                  | 17                 | 17 (5.8%)  |
| 1B2P                       | 20                     | 29                 | 40                 | 89 (30.3%) |
| 2B3P                       | 9                      | 25                 | 32                 | 66 (22.4%) |
| 2B4P                       | 23                     | 10                 | 26                 | 59 (20.1%) |
| 3B5P                       | 20                     | 12                 | 31                 | 63 (21.4%) |
| <b>TOTAL</b><br>no. units  | <b>72 (24.5%)</b>      | <b>76 (25.9%)</b>  | <b>146 (49.7%)</b> | <b>294</b> |
| <b>TOTAL</b><br>hab. rooms | <b>216 (26.3%)</b>     | <b>211 (25.7%)</b> | <b>395 (48.1%)</b> | <b>822</b> |

12.5 As set out in the table above, the proposal provides a fairly even mix of unit sizes between 1 bedroom 2-person, 2-bedroom 3-person, 2-bedroom 4-person and 3-bedroom 5-person units, at 30.3%, 22.4%, 20.1% and 21.4% of the overall number of units respectively. The proposal includes some studio units, however, these comprise only 5.8% of the total number of units, to reflect the intended character of the proposal, which whilst well-connected to public transport and would be attractive to commuters, would also be attractive to families, being well served by social infrastructure provision. Further regard is had to the affordable housing provision, which is proposed at 50.4% (by unit) and 51.9% (by habitable room), and as demonstrated in the table above, the larger sized homes have been skewed towards the affordable rent whilst the smaller units are skewed towards the S/O and private sale units.

12.6 It is therefore considered that the proposed development, due to its nature, location and context, provides an acceptable mix of unit types in accordance with Policy H2 of the Core Strategy and Policy H10 of the London Plan.

### 13. **Affordable Housing**

13.1 Policy H4 of the London Plan (Delivering affordable housing) sets the strategic target of 50% of all new homes delivered across London to be genuinely affordable. As such, all major developments which trigger affordable housing requirements (10 units or more) should provide affordable housing through the threshold approach (discussed below), using grant to increase affordable housing delivery beyond the level that would otherwise be provided. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

13.2 Policy H5 (Threshold approach to applications) sets out that to follow the Fast Track Route of the threshold approach, meaning the applicant is not required to submit a financial viability assessment to support their application, development proposals must meet or exceed the relevant threshold level of affordable housing on site without public subsidy (in this case 35%), be



consistent with the relevant tenure split, meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant and demonstrate that the strategic 50% target in Policy H4 has been considered and have sought grant to increase the level of affordable housing.

- 13.3 Policy H6 of the London Plan (Affordable housing tenure) states that affordable housing products within a development should include a minimum of 30% low-cost rented homes (including London Affordable Rent or Social Rent), a minimum of 30% intermediate products which meet the definition of genuinely affordable housing (including London Living Rent and London Shared Ownership), with the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products, based on identified need.
- 13.4 The supporting text to Policy H6 sets out that there is a presumption that the 40% to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community. The appropriate tenure split should be determined through the Development Plan process or through supplementary guidance.
- 13.5 Policy H3 of the Greenwich Local Plan requires developments of 10 or more homes, or within sites of 0.5 hectares or more, to provide a minimum of 35% affordable housing provision. The precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and the development, and affordable housing should normally be provided as 70% social/affordable rent and 30% intermediate, subject to an assessment of viability.
- 13.6 New developments creating 10 units or more must also have regard to the Mayor's Viability Supplementary Planning Guidance (SPG), which confirms that any proposal which achieves a provision equivalent to 35% of the overall number of units as being affordable (50% on public land), without grant, and meets the tenure mix, can benefit from the Fast Track Route which means there is no requirement to assess financial viability. For major developments which cannot achieve the 35% threshold for affordable housing (50% on public land) the proposed provision should be accompanied with supporting viability evidence, within a standardised format as prescribed within the Mayor's Viability SPG.

13.7 The proposal makes provision for 148 affordable homes (50.4% by unit and 51.9% by habitable room), and therefore significantly exceeds the 35% threshold required to benefit from the fast-track route and the minimum target of 35% set out in the Local Plan. Of these 148 affordable dwellings, the proposal includes 72 London Affordable Rent (LAR) dwellings and 76 Shared Ownership (S/O) dwellings, which comprise 48.6% and 51.4% of the total affordable housing provision respectively, and as such, this seems to conflict with Policy H6 of the London Plan and H3 of the Local Plan, which both seek 70% social/affordable rent and 30% intermediate.

13.8 However, it is noted that the proposal seeks a policy compliant tenure mix, by unit, for the first 35% of affordable housing provided, and all additional affordable housing provided beyond 35% (i.e. up to 50.4%) is provided as intermediate S/O housing. The proposed tenure mix, by unit, is shown in the table below, where it is demonstrated that the proposal would be policy compliant in affordable housing terms and would not require a financial assessment if assessed on the basis of 35% affordable housing provision only. Therefore, any uplift in affordable units beyond 35%, whilst resulting in a tenure mix which appears to conflict with Policy H3 and H6 of the Local Plan and London Plan respectively, results in more affordable housing overall, and does not result in a conflict with the Mayor’s Viability SPG, and therefore would not require a financial viability assessment to be submitted.

|                  | Affordable Housing Provision (Tenure Split) |               |
|------------------|---|---------------|
|                  | 35% (70/30)                                 | 50.4% (49/51) |
| No. of Units     | 103   | 148           |
| LAR              | 72  | 72            |
| Shared Ownership | 31  | 76            |

13.9 As the table above demonstrates, a scheme which provides less affordable housing overall (35%) but meets the tenure mix described in the Local Plan (70/30), would still benefit from the fast-track route described in the Mayor’s SPG. On this basis, it is considered that the additional 45 S/O affordable units provided within the scheme, which bring the total on-site affordable housing provision to 50.4% (approximately 15% beyond the 35% target of the Local Plan), represents significant benefit in the balance of planning considerations, and the overall affordable housing provision on site would make a significant contribution to affordable housing within the borough.

13.10 The tenures are arranged so that each block serves a single tenure with the exception of Block B1, which has S/O units at the lower levels and private sale units on the top two floors, and Block B2 which includes LAR units at ground floor level. All tenures have direct access to the communal amenity spaces, include dual aspect, south facing and ground floor homes, and it is

therefore considered that tenure distribution is acceptable and does not differentiate in terms of quality or location of accommodation between private sale and affordable units. In any event, it is recognised that the scheme proposes more affordable units than private sale units across the site, with a focus on shared communal space and amenities, and on this basis, almost inevitably, tenure distribution is relatively even site-wide as demonstrated by Figure 7.1 within the Design and Access Statement.

- 13.11 The LAR benchmark and S/O income thresholds are shown in the table below. The LAR benchmark is in line with the Mayor’s Affordable Housing and Viability SPG, and the S/O income threshold has been agreed between the applicant and the local planning authority for the first three months, to increase to £90,000 after this in accordance with the Mayor’s Viability SPG.

| Unit Size | LAR Benchmark       | S/O Income Threshold |
|-----------|---------------------|----------------------|
| 1-bedroom | £150 (16 dwellings) | (29 dwellings)       |
| 2-bedroom | £158 (36 dwellings) | (35 dwellings)       |
| 3-bedroom | £167 (20 dwellings) | (12 dwellings)       |

- 13.12 As the proposal benefits from the fast-track route, a late-stage viability review is not required. The above agreed level of affordable housing would be secured through an s106 agreement (see section 21), and if the proposal has not commenced within 2 years of permission being granted, the proposal would be subject to an early-stage review.

#### **14. Design, Townscape and Heritage**

- 14.1 In accordance with the council’s statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is necessary to have special regard to the desirability of preserving the setting of a listed building and to preserving or enhancing the character or appearance of a conservation area.
- 14.2 In addition, the NPPF advises that where a proposed development would lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 14.3 The NPPF further advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Whether a proposal

causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case, relevant local policies and the consideration of the NPPF. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives and public benefits should flow from the proposed development so that they are of a nature or scale to be of benefit to the public at large and not just of private benefit.

- 14.4 Policy HC1 of the London Plan (Heritage conservation and growth) states that Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 14.5 In addition, development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- 14.6 Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, including existing and planned supporting infrastructure capacity. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 of the London Plan. In areas of comparatively low densities, incremental densification should be actively encouraged by to achieve a change in densities in the most appropriate way.
- 14.7 As such, development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape with due regard to existing and emerging street hierarchy, building types, forms and proportions, should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area, be street-based with clearly defined public and private environments, and facilitate efficient servicing and maintenance of buildings

and the public realm that minimise negative impacts on the environment, public realm and vulnerable road users.

- 14.8 Proposals should further respond to the existing character of a place by identifying the special and valued features and characteristics that are unique and should be of a high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well whilst allowing every new development to make the most efficient use of land by optimising site capacity. This means ensuring the development's form is the most appropriate for the site and land uses meet identified needs. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development is the optimum development for the site. A design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.
- 14.9 Policy D8 of the London Plan (Public realm) requires development proposals to encourage and explore opportunities to create new public realm and ensure that the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well designed in order to minimise intrusive lighting infrastructure and reduce light pollution.
- 14.10 Policy D8 further outlines that proposals should seek to maximise the contribution that the public realm makes, to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds.
- 14.11 Policy D9 of the London Plan (Tall buildings) sets out that the definition of a tall building is defined at a local level, depending on the characteristics of the surrounding area, but in any case, should not include developments of less than 6 storeys or 18 metres above ground level. Where a tall building is proposed, the visual, functional and environmental impacts of the proposal should be carefully considered, including the cumulative impacts with other existing, planned or consented developments in the vicinity.

- 14.12 Policy D9 further states that whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. Proposals which include tall buildings should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.
- 14.13 Policy DH1 of the Royal Greenwich Local Plan (Design) sets out that all developments are required to be of a high quality and should demonstrate that they contribute positively to both the built and natural environment. To achieve this aim, development should promote local distinctiveness by providing a site-specific design solution, and should provide a positive relationship between the proposed and the existing urban context by respecting the architecture of surrounding buildings, the quality and nature of materials, established layout and special character, the scale, height, bulk and massing of the adjacent townscape, the architectural and historic features as well as making effective use of land.
- 14.14 In addition, and in accordance with the requirements of Policy D9 of the London Plan, Policy DH2 of the Royal Greenwich Local Plan outlines locations where tall buildings may be appropriate. These locations are Woolwich Town Centre, Greenwich Peninsula, Greenwich Peninsula West, East Creekside, Charlton Riverside, Tamesis Point in Thamesmead, Thamesmead Town Centre, the area directly surrounding Abbey Wood train station, and 'the Hub' area surrounding Kidbrooke station, with all other parts of the borough inappropriate for tall buildings.
- 14.15 Policy DH3 (Heritage Assets) and DH(h) (Conservation Areas) of the Royal Greenwich Local Plan states that the borough will protect and enhance heritage assets, by preserving and enhancing the character and appearance of its Conservation Areas and their settings. Of high importance is the local scale, the established pattern of development, building form and the use of materials, and proposals which would have a visual effect on the character and appearance of a Conservation Area should respect the setting of that area.

14.16 Policy DH(m) of the Royal Greenwich Local Plan (Archaeology) states that proposals should properly assess and plan for the impact of proposed developments on archaeological remains where they fall within 'Areas of High Archaeological Potential (AHAPs)'. In certain instances, preliminary archaeological site investigations may be required before proposals are considered.

#### 14.17 **Layout, Scale and Massing**

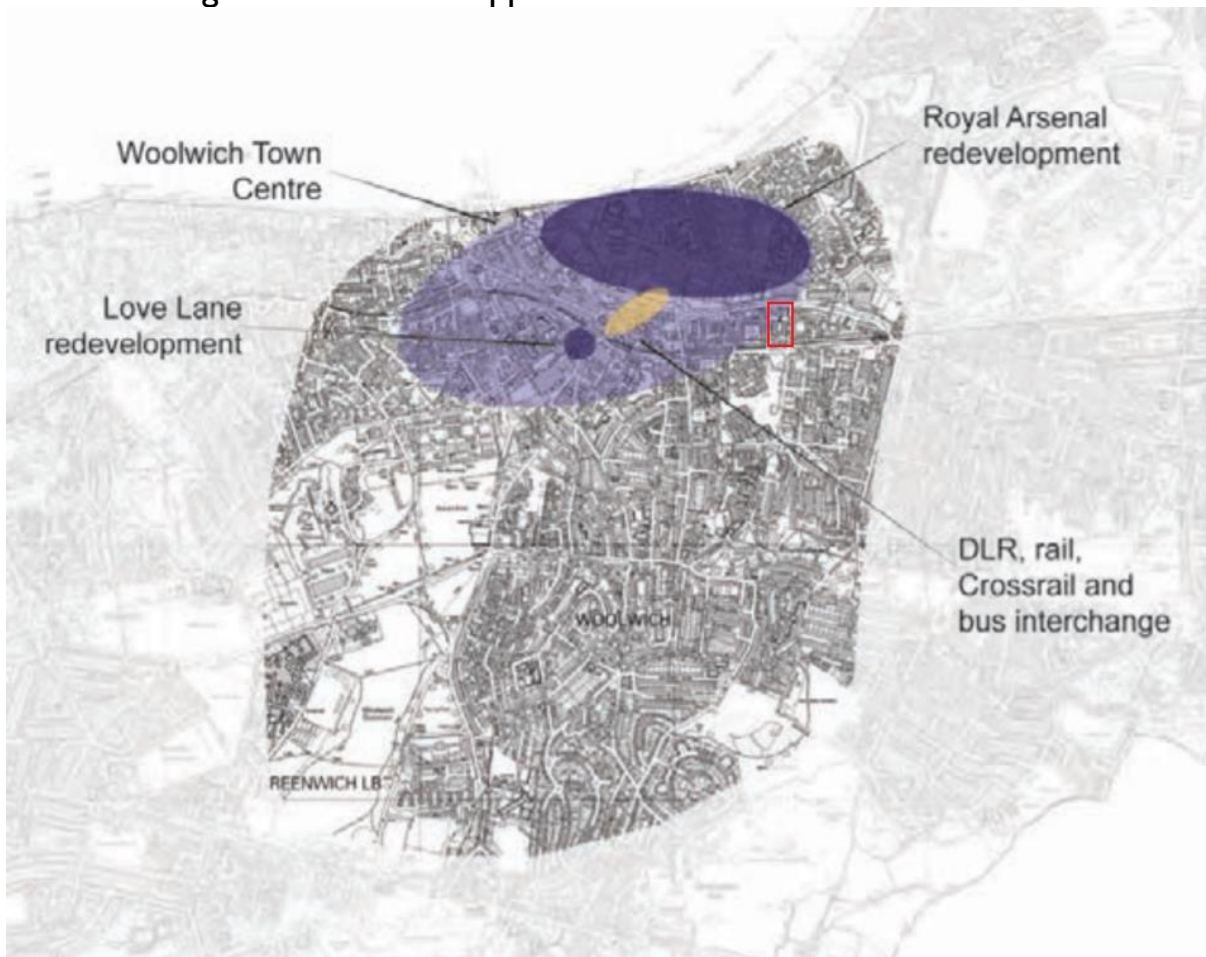
14.18 At present, the application site is dominated by hardstanding and comprises three main buildings which are interconnected by a raised walkway, with a total combined floorspace of approximately 10,000m<sup>2</sup>. These three buildings are all of a similar height, being two or three-storeys high, with the most recently erected building, which acts as the principal entrance and elevation facing Plumstead Road, occupying the north-west corner of the site whilst the original buildings occupy the north-east corner and the southern half of the site. The land around the buildings is largely hardstanding, and used for car parking, and part of the site is occupied by portacabins and a large garage/storage area in the south-west corner.

14.19 As discussed above, the existing college buildings are in poor condition, and much of the floorspace is unusable for the college, with a number of ad-hoc additions visible from the public realm which are visually unattractive. Moreover, whilst due to its limited size the college is not visible from distant views, the existing campus has a very insular character, with a main entrance facing Plumstead Road, which results in a group of buildings which visually and functionally turns their backs to Villas Road and Invermore Place, with the southern part of the site acting as a 'back of house' area. In addition, whilst some trees and planting are present, there is very little green space, and the complex as a whole detracts from the appearance of the streetscape at a local level.

14.20 The surrounding area is predominantly residential in its character, with prevailing building heights of three and four storeys, although it is recognised that 1-5 Villas Road (odds), opposite the north-east corner of the application site are two storeys in height and building heights on Walmer Terrace to the south reach five storeys. There are further a number of existing tall buildings in the area, both to the south within the otherwise generally low-rise houses, but also within Plumstead Town Centre (Elmgrove Point – 20 storeys) to the east and Woolwich Town Centre, (Royal Arsenal, Spray Street – 22 storeys) to the west.

14.21 Having regard to Policy D9 and DH2 of the London Plan and Local Plan respectively, it is considered that the site falls partly inside and partly outside

the area indicatively shown as appropriate for tall buildings, as shown in the figure below, taken from the Tall Buildings Assessment (2011), with the application site shown in red. The area shaded blue is potentially appropriate for tall buildings and covers the western part of the site. The Tall Buildings Assessment focuses on the development of tall buildings within the Woolwich Town Centre Boundary, which is located 40 metres to the west, citing the high PTAL and access to other infrastructure as the rationale for supporting tall buildings in the area, and sets out that where the PTAL is lower, tall buildings would not be supported.



14.22 The proposed development includes elements which are taller than the immediate context, namely Blocks A1 and B3 which would be 10 and 13 storeys respectively, whilst the remainder of the proposed built form would be 5-7 storeys in height. As such, noting the prevailing height of the surrounding built form, the proposed development is considered to be a tall building for the purpose of this assessment as defined by Policy D9 of the London Plan. Block A1 is positioned in the north-east corner of the site, facing the junction of Plumstead Road and Villas Road, whilst Block B3 is located centrally within the site, one side facing New Street to the north and the other side facing the proposed communal courtyard garden to the south.



- 14.23 Block A1 appears as a standalone building in the north-east corner, however, is connected to the proposed college building at ground floor level through a shared podium. Within Block A1, the ground floor level is proposed to comprise a commercial unit facing Plumstead Way, and the concierge for the site-wide residential development (to be delivered as part of Phase 1), as well as cycle and refuse stores. Block B3 is 13-storeys, and is therefore the tallest part of the proposal, but incorporates 10-storey “shoulders” on the east and west elevation, which gives the overall composition of Block B3, together with Blocks B2 and B4 on either side (both 5-storeys), a stepped appearance which assists in creating a legible sequence of buildings within the site. Blocks B1 and B5, referred to as “sentinels” within the design and access statement, bookend the southern end of the proposed ‘U’ shaped building, and are proposed as 7-storeys in height, which further contribute to the stepped up-and-down appearance of the proposal.
- 14.24 Policy D9 requires a thorough assessment of the visual, functional and environmental impacts of tall buildings, paying particular attention to the design of the top, middle and base of the tall buildings as three distinct, but complementary sections to address how the building is perceived from long, mid and short-range views respectively.
- 14.25 In broad terms; the top of the building should make a positive contribution to the existing and emerging skyline without affecting local or strategic views; the middle of the building should reflect the proportions and materiality of the local townscape and promote legibility; whilst the base of the building should have a direct relationship with the street, maintaining an appropriate pedestrian scale, character and vitality.
- 14.26 In support of the application, a Heritage, Townscape and Visual Impact Appraisal (HTVIA) has been submitted to assess the impacts of the proposed tall buildings on short, medium and long-range views and the significance of these impacts in townscape terms. The HTVIA assesses 13 locations, with long views generally assessed from the south due to the rising height of the ground (Shrewsbury Park and Plumstead Common), mid-range views from the west and north (within Woolwich, the Royal Arsenal and Broadwater Road) and short-range views in every direction (Plumstead Road, Glyndon Recreational Grounds and Walmer Terrace).
- 14.27 It is considered that the HTVIA accurately shows the locations most likely to be affected by the introduction of tall buildings, and comprehensively assesses the impacts of the proposal on these views. Despite the significant increase in scale of the proposal, the HTVIA demonstrates that the proposal would only just be visible from within Shrewsbury Park (view 1), appearing in the context of a number of tall buildings within the panoramic view from this location, and

therefore accords with Policy DH(g) of the Local Plan, as this is a view of local importance. In addition, the proposal would not be visible from the western part of Plumstead Common (view 2), as it would be entirely screened by existing low-rise residential development and would be marginally visible, but largely screened by existing tall developments on Villas Road, from the junction of Bramblebury Road and Heavitree Road (view 13), which offers long views from within Plumstead Common Conservation Area.

- 14.28 Overall it is considered that the proposal would not significantly affect long views, appearing broadly consistent with the surrounding context in terms of its height and scale, without significantly affecting the skyline of the wider area. Moreover, due to the high architectural quality (discussed below) and the variation of heights between buildings, including the retention of visible gaps between the tallest elements, it is considered that the proposal would provide a positive backdrop to existing developments in the area, supporting a transition in character between the existing, predominantly low-rise, residential areas to the south and east with the higher-density existing and consented developments of Woolwich and the Royal Arsenal to the west, which would be reflective of the excellent public transport accessibility of the site.
- 14.29 It is considered, however, that the proposed tall buildings do not fully comply with Policy D9, in that the top of the proposed building effectively blends into the middle section, with a double height parapet the only design feature at the top of the tall buildings. This raises some concerns, however in the context of the scheme as a whole, noting the generally high level of architecture and landscaping, the design of the top of the building is not considered to be a significant issue.
- 14.30 The impact on mid-range views should seek to assess the form and proportions of the proposed tall building and whether it makes a positive contribution to the local townscape in terms of legibility, proportions and materiality.
- 14.31 The proposed development would be readily visible from a number of mid-range viewing locations, including within Woolwich Town Centre and Conservation Area and the Royal Arsenal Conservation Area, as well as from the north on Broadwater Road. Glyndon Park, to the south, occupies a long stretch of open space which terminates at the railway siding forming the southern boundary of the application site, and the viewing location chosen in the HTVIA is also considered to reflect a mid-range view. Within these views from the north and west, whilst clearly visible, the proposed development either appears in the background, sometimes partially screened by existing residential developments, or as a natural continuation of built form along

Plumstead Road, which when looking from the west, would appear in the same context as the Spray Street Quarter and the existing Royal Arsenal towers.

- 14.32 Glyndon Park, to the south of the site, is an irregularly shaped large area of recreational open space, which includes Villas Road Play Area and a multi-use games area, and is surrounded predominantly by residential development of varying scales and architectural styles, but with Foxfield Primary School and Glyndon Community Centre sited at the southern end. Whilst Woolwich Town Centre (to the west) has more instances and taller buildings than Plumstead Town Centre (to the east), the intervening residential areas between the application site and the respective town centres are generally lower-rise to the west and taller to the east within the Glyndon Estate, with some examples of much taller buildings in the area, such as Claymill House, to the south of Glyndon Park, which appears somewhat incongruous in the otherwise low-rise context.
- 14.33 In townscape terms, the residential areas near to the application site are considered to be of relatively neutral architectural merit, with relatively simple architectural styles evident in the area. However, due to the regular and planned sequence of buildings and open spaces, it has a pleasant and verdant character with a good mix of low and mid-rise buildings.
- 14.34 The proposed development is considered to represent an appropriate design response in terms of its overall scale and appearance as a group of buildings which appropriately transition from low, to medium and then to a higher scale. In addition, because of the variation in height between the various blocks, the proposed development would appear as a legible sequence of buildings which gradually rise and fall away again as different parts of the site become visible to the viewer, which is considered to complement the symmetrical and geometric pattern of the proposed development, which is most apparent from Glyndon Park (view 3).
- 14.35 It is further considered that the use of tall buildings within the site allows for the creation of a local landmark, which, whilst not being readily visible from extended views, would act as a focal point to mark both the civic presence of the college on Plumstead Road but also assist in wayfinding as a marker for the northern entrance to Glyndon Park. In this regard, it is also considered that the five storey high (equivalent to seven residential storeys) college and ten storey residential building would effectively mark the site approaching from the east and west of Plumstead Road. Their overall scale is considered to be within that of local landmarks and suitable to celebrate the educational uses designed on the site.

- 14.36 The impact on short-range views is more pronounced than the impact on long and mid-range views, which reflects the fairly significant change in scale at a local level, but the relatively minor change in the context of emerging developments within Woolwich. Short range views include those taken from Walmer Terrace (view 4), Plumstead Road East and West (views 5 and 7 respectively) and Skeffington Street (view 8).
- 14.37 The context of Plumstead Road is markedly different to the residential areas to the south, and due to the width and intensity of use of this main vehicular route, has a less residential character, notwithstanding that residential uses remain the most common use on the southern side of Plumstead Road. The northern side of the road has a mixed character which varies along its length, characterised by a mix of historic buildings and low-rise industrial warehouse-type buildings, which changes quite abruptly to a high-density residential character within the Royal Arsenal.
- 14.38 Where tall buildings are proposed, it is important to consider the base of the building, which should have a direct relationship with the street, maintaining its pedestrian scale, character and vitality where possible, and where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces, there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.
- 14.39 The base of the building is considered to be well-defined, and the proposed materials, in combination with the increased floor-to-ceiling height of the ground floor, contribute to the human scale of the building. The college building and Block A1 are connected at ground floor level by a podium which spans the full width of the plot, which would provides a coherent active frontage facing Plumstead Road and support the mixed-use character of Plumstead Road. There is a physical separation of 14 metres above ground floor level between the college and Block A1, to ensure there is a visual distinction between the college and residential uses, and to ensure the prominence of the college and its civic presence. This also presents an opportunity to provide a podium communal amenity space for residents and secure under-5s play space, at first floor level, facing towards New Street.
- 14.40 As discussed above, the proposed redevelopment is considered to be acceptable in land-use terms, and the reduction in college floorspace is considered appropriate, however, it is important that any re-development of the site seeks to maintain and promote the civic presence of the college as the principal use on site. Whilst lower than Block A1 and Block B3, by reason of its prominent siting at the corner of Invermore Place and Plumstead Road, and by reason of its expressive architecture, it is considered that the

proposed college draws the eye, and adds significant visual interest to the area, juxtaposing the simpler architectural styles of residential uses in the area. The college building has been designed to present its most expressive frontage facing Plumstead Way, with a large defined entrance finished in chamfered pressed metal that extends from the ground to the third storey, breaking the rhythm of the podium, and thereby better articulating the frontage as the main entrance to the college.

- 14.41 At ground floor level across the remainder of the site, the introduction of residential units is welcomed, and allows for a more active and engaging appearance, and is considered a significant improvement over existing site conditions. The introduction of front doors opening out into a front garden, which face the street, is considered acceptable in reinforcing the proposed residential character of Invermore Place and Villas Road, and further complements the existing character, where buildings are generally set back from the road to allow for small gardens.
- 14.42 The proposal further includes passageways situated either side of Block B3 at ground floor level, which provide pedestrian access from the proposed communal courtyard to New Street and are integral to the permeability of the scheme. These passageways further create views from the new street, through the courtyard and towards the row of trees which marks the boundary of the railway siding. The passageways are double height spaces, to create a sense of openness within an otherwise enclosed space, whilst maximising views through and allowing more sunlight to penetrate into this space. The entrances to B2, B3 and B4 are also accessed from the passageways and it is considered that this contributes to the overall sequence of spaces within the site, moving from a busier environment to the north to a more serene residential environment to the south.
- 14.43 The entrances to building B1 and B5 sit within a vertical slot with balconies above that create a canopy to the entrances. To announce the entrances, the coloured feature brick stands to one side of the door and wraps around into the internal lobby space, connecting the internal and external spaces, and this is considered acceptable.
- 14.44 Overall, it is considered that the base of the proposal, has been well-designed, would complement the existing residential character of the area and the impact of the proposal on local views is considered to be beneficial. At present, the college building does little to add visual interest to the streetscene, with virtually no interaction between the existing uses and Invermore Place/Villas Road, and the proposed development would add visual interest and activity whilst reinforcing the residential appearance of the area.

14.45 The proposed layout, including the introduction of the new road (New Street) and the division of the site into two parts has intrinsic functional benefits; allowing access into and through the site, as well as increasing permeability in the area, and further allows the development to be delivered in phases which is essential to allow the college to continue to function during redevelopment.

14.46 It is further recognised that the proposed 'U' shaped layout would be consistent with existing patterns of development in the area, namely Maynard House to the west, which is similarly arranged around a central landscaped courtyard (including designated play areas), and the proposed layout maximises solar gain by reason of its southerly orientation. It is further recognised that Glyndon Estate, to the south-east, is generally characterised by low and mid-rise buildings (with some taller buildings), arranged around areas of amenity spaces, but private gardens are also common for ground floor dwellings, and the proposal would therefore be consistent with the wider area in seeking to replicate this.

#### **14.47 Conservation and Heritage Impacts**

14.48 Located between Villas Road and Invermore Place, the site is close to the boundary of the Royal Arsenal Conservation Area and is within the vicinity of two listed structures: Royal Arsenal Middlegate House; and Royal Arsenal Middlegate with its attached western boundary wall. On approach from both the east and west along Plumstead Road, the proposed development will be visible within the setting of the listed structures and the Conservation Area, and it is therefore necessary to assess the impact on the setting of these heritage assets. The existing context of the site is mostly mid-rise development which lines Plumstead Road, and views along Plumstead Road heading west are dominated by the towers of the Royal Arsenal development, with future development (e.g. Spray Street Quarter) likely to further add to the taller buildings in the area. In any event, existing 20<sup>th</sup> century development largely surrounds the listed structures and has somewhat compromised their context.

14.49 The proposed development will front a busy road into/out of Woolwich which runs alongside the Royal Arsenal Conservation Area and the two listed structures which are closest to the site. It is along this road that the proposed development will mostly be read in conjunction with the heritage assets, and it is recognised that the increased height of the development in comparison to the existing buildings would dramatically change views along Plumstead Road from the east as demonstrated by View 5 of the HTVIA. However, it is not until beyond the site (moving west) that the listed structures (Middlegate House and Middlegate and walls) and the Royal

Arsenal Conservation Area come into view. As such, it is considered that the proposed development will make no appreciable change to the setting of the heritage assets from this direction.

- 14.50 View 7 of the HTVIA shows the view heading east along Plumstead Road, however, the angle of the view is such that the listed structures are not included. It is from this approach that the proposed development will be more readily viewed in the context of Middlegate House and the listed gate and wall but it is considered that the proposed development is sufficiently far away from the listed structures and the setting of these historic structures has already been somewhat compromised, that the impact the of new development would be negligible.
- 14.51 View 8 of the HTVIA shows the proposed development as the backdrop to Middlegate House when viewed from Skeffington Street. Currently the listed building is the dominant feature in this view and the proposed development would affect this, being visible by reason of its height, however, it is acknowledged that the view of Middlegate House from Skeffington Street is not the principle view of the building, and the impact overall is negligible.
- 14.52 The representative view from within the Royal Arsenal Conservation Area (View 9 of the HTVIA) demonstrates that the impact from within the conservation area would be negligible and that the setting of the conservation area would be more greatly affected by other emerging developments, and the view to the west from Beresford Gate will have no impact on the setting of this listed structure.
- 14.53 On this basis, it is considered that the proposal is acceptable in terms of its impact on heritage assets, resulting in negligible harm to Middlegate House and the attached listed wall, and negligible harm to the Royal Arsenal Conservation Area. Notwithstanding that no harm has been identified, it is recognised that the proposal brings forward a significant number of public benefits, such as a high level of affordable housing, is supported in principle as the redevelopment of brownfield land in an area of excellent public transport accessibility, and the proposed uses are consistent with wider land uses in the area whilst retaining the integral existing use of the college on site. As such, in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, if less than substantial harm had been identified, it is considered that the public benefits would outweigh this harm in this instance.

## 14.54 Detailed Design and Architecture

- 14.55 In townscape terms, the residential areas near to the application site are considered to be of relatively neutral architectural merit, with relatively simple architectural styles evident in the area. However, due to the regular and planned sequence of buildings and open spaces, relatively wide pavements and public realm, and defined street edges with defensible spaces, the nearby residential areas have a pleasant and verdant character. It is further noted that generally, residential blocks have front doors at ground floor level and deck access above which further contributes to a feeling of activity and contributes to interactions between neighbours, thereby promoting a sense of community.
- 14.56 Prevailing materials in the area are generally red and dark brick tones, however there are a number of lighter brick tones used locally, including for some historic buildings located within Woolwich town centre and the Royal Arsenal. Accordingly, and to ensure that the proposal does not appear monolithic or dominating, the scheme incorporates a mix of external materials, façade treatments and balcony designs, and seeks to soften the appearance of the built form through the use of curved corners for Blocks B1 and B5, which when viewed together with Block B3, pleasantly contrast with the rigid geometric design of the whole development.
- 14.57 Blocks B1 and B5 are proposed to be finished in yellow and earth brick tones, Blocks B2 and B4 would be finished in lighter earth brick tones, with paler mortar, to provide some contrast with the “sentinel” buildings to the south, and to break up the visual massing of the overall development to allow each component to be appreciated separately. Block B3, being the tallest element of the proposal, would use the lightest brick tone, to minimise its impact on the skyline. The base of the residential buildings would be clearly demarcated as a separate feature and would use a dark grey/black brick tone, thereby providing a consistent frontage at ground floor level site-wide, contributing to the perception of a unified development, but with different accentuated features above to provide each Block with a sense of personal identity.
- 14.58 To add texture and interest to the façades, and further ingrain the building into the local context. Three subtle brick details have been applied, tide lines, soldier coursing and recessed lines. These features, whilst simple, are considered to provide visual relief, and contribute to the overall sense of cohesiveness. The balcony strategy is to vary the types of balcony based on their facade orientation, by varying the relationship of the balcony to the facade. Balconies to the north and south façades would be expressed as fully projecting to maximise views to the park in the south and daylight to the north. Balconies to the east and west typically lining the streets are located



within the vertical slots and are semi-recessed. The balconies on Plumstead Road are fully recessed and cut into the corners as a defensive move in response to the busy street.

14.59 On this basis, subject to securing these details by way of condition, it is considered that the proposed external materials and detailed design of the proposal is acceptable and would contribute to a sense of place whilst ensuring that the scheme integrates satisfactorily with its surroundings.

## 15. Quality of the Residential Environment

15.1 Policy D6 of the London Plan (Housing quality and standards) requires all new residential properties to meet the minimum space standards set out in the table below:

|                        |                                   | Minimum gross internal floor areas* and storage (square metres) |                    |                    |                  |
|------------------------|-----------------------------------|---|--------------------|--------------------|------------------|
| Number of bedrooms (b) | Number of bed spaces (persons(p)) | 1 storey dwellings  | 2 storey dwellings | 3 storey dwellings | Built-in storage |
| 1b                     | 1p                                | 39 (37) *   |                    |                    | 1                |
|                        | 2p                                | 50  | 58                 |                    | 1.5              |
| 2b                     | 3p                                | 61  | 70                 |                    | 2                |
|                        | 4p                                | 70  | 79                 |                    |                  |
| 3b                     | 4p                                | 74  | 84                 | 90                 | 2.5              |
|                        | 5p                                | 86  | 93                 | 99                 |                  |
|                        | 6p                                | 95  | 102                | 108                |                  |
| 4b                     | 5p                                | 90  | 97                 | 103                | 3                |
|                        | 6p                                | 99  | 106                | 112                |                  |
|                        | 7p                                | 108   | 115                | 121                |                  |
|                        | 8p                                | 117   | 124                | 130                |                  |

15.2 Policy D6 further states that the minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. Housing development should be of high-quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Proposals should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more

appropriate design solution as a result of site constraints which would mean dual aspect dwellings would severely restrict optimising the site's potential. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

- 15.3 In addition, Policy D6 of the London Plan and Standard 26 of the Mayor's London Housing SPG sets out that a minimum of 5 m<sup>2</sup> of private outdoor open space should be provided for 1-2 person dwellings and an additional 1 m<sup>2</sup> should be provided for each additional occupant and it must achieve a minimum width and depth of 1.5 metres. Private amenity space must achieve a minimum width and depth of 1.5 metres to be functional and fit for purpose. As such, a 3-person dwelling should include 6 m<sup>2</sup> of external private amenity space, a 4-person dwelling should include 7 m<sup>2</sup>, a 5-person dwelling should include 8 m<sup>2</sup> and so on.
- 15.4 Policy S4 of the London Plan (Play and informal recreation), sets out that proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation and enable children and young people to be independently mobile. For residential developments, this means incorporating good-quality, accessible play provision for all ages, with at least 10m<sup>2</sup> of play space provided per child, based on the GLA's child yield calculator. Play space should be accessed safely and independently, be overlooked, not be segregated by tenure, incorporate accessible routes for children and young people, incorporate greenery and should generally provide a stimulating environment.
- 15.5 The supporting text to Policy S4 sets out that there should be appropriate provision for different age groups, including older children and teenagers and that play space provision should usually be provided on-site.
- 15.6 Policy D3 of the London Plan further states that proposals should deliver appropriate outlook, privacy and amenity, provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity, help prevent or mitigate the impacts of noise and poor air quality, and achieve indoor and outdoor environments that are comfortable and inviting for people to use.
- 15.7 Moreover, Policy D5 of the London Plan (Inclusive design) sets out that proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, providing independent access without additional undue

effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, and proposals should ensure they are compliant with Policy D12 of the Plan (Fire safety) and place fire resilience central to the proposal's design.

- 15.8 To provide suitable housing and genuine choice for London's diverse population, including disabled people and families with young children, Policy D7 of the London Plan (Accessible housing) states that all residential development should include at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 15.9 Policy D13 (Agent of Change) of the London Plan introduces the 'Agent of Change' principle, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development and requires local authorities to take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- 15.10 Policy SI 1 of the London Plan (Improving air quality) states that proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create unacceptable risk of high levels of exposure to poor air quality.
- 15.11 As such, as a minimum, proposals must be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution, whilst making provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures. Major development proposals must be submitted with an Air Quality Assessment. Proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

- 15.12 Policies D8 and D9 of the London Plan (Public realm and Tall buildings respectively) require proposals to ensure that appropriate shade, shelter and seating are provided, taking into account microclimatic considerations, including temperature and wind, so as not to compromise the comfort and enjoyment of the proposed open spaces around tall buildings.
- 15.13 Policy H5 of the Royal Greenwich Local Plan (Housing Design) states that new residential developments should be of a high quality, both internally and externally, and sets out that new development should be well insulated in terms of noise and weather, be dual aspect where possible, avoiding single aspect north-facing units, be safe and secure, be accessible, and should make adequate provision for external amenity space and waste recycling. In addition, family sized units should be located close to amenities, play areas and schools, and residential developments of 25 or more units should be designed to have 10% of their dwellings as wheelchair accessible.
- 15.14 Policy H(e) of the Royal Greenwich Local Plan (Children's Play Areas) states that residential developments that include over 50 units of family housing require suitably equipped and well-designed children's play areas for different age groups to be provided.
- 15.15 Policy E(a) of the Royal Greenwich Local Plan (Pollution) states that housing or other sensitive uses will not normally be permitted on sites adjacent to existing problem uses, unless ameliorating measures can reasonably be taken and which can be sought through the imposition of conditions.
- 15.16 Internal Space and External Amenity**
- 15.17 The schedule of accommodation submitted with the application sets out that all units would exceed, and in some cases significantly exceed, the minimum space standards set out in the London Plan, apart from four studio units within Block A1, which would all be 38.9m<sup>2</sup>, where the minimum standard is 39m<sup>2</sup>. In the context of the scheme as a whole, this very minor shortfall of 0.1m<sup>2</sup> for four units is considered acceptable and would not result in a reduced quality of life for future occupants.
- 15.18 Each unit is proposed to have private amenity space, and have access to the communal garden and play facilities located within the central courtyard. Each flatted residential dwelling above ground floor level is provided with private amenity space, in accordance with the requirements of the Housing SPG, in the form of a balcony. The ground floor properties fronting Villas Road, Invermore Place and the new internal street have front gardens or 'buffer zones' to ensure a degree of separation to the public highway to maintain privacy, and the units are also oversized to incorporate the relevant outdoor

amenity space requirement within the properties, in accordance with the Housing SPG, where it was considered the provision of front gardens would not constitute sufficiently private outdoor amenity space.

15.19 On this basis, it is considered that the proposed sizes of the flats and their private amenity spaces, together with the easily accessible communal amenity spaces, are acceptable and would contribute towards the residential element of the proposal achieving a high standard of accommodation.

## 15.20 **Daylight, Sunlight and Outlook**

15.21 The Daylight and Sunlight Report (May 2020), updated through the Summary Note (16<sup>th</sup> June 2021), assess the daylight and sunlight conditions for future occupiers of the proposed development, using the average daylight factor (ADF) test and annual probable sunlight hours (APSH) test, which is considered to be the correct assessment methodology to quantify daylight and sunlight conditions within the proposed development.

15.22 Average daylight factor (ADF) is a measure of the adequacy of diffuse daylight within a room, and accounts for factors such as the size of a window in relation to the size of the room, the reflectance of the walls, and the nature of the glazing and number of windows.

15.23 BRE guidelines confirm that the acceptable minimum ADF target value depends on the room use, and these are 1% for a bedroom, 1.5% for a living room and 2% for a family kitchen. In cases where one room serves more than one purpose, the minimum ADF target should be for the room type with the highest value. Notwithstanding this, in practice, the principal use of rooms designed as a 'living room/kitchen/dining room' (LKDs) is generally as a living room and accordingly, it is often reasonable to apply a target of 1.5% to such rooms.

15.24 The Daylight and Sunlight Report sets out that there would generally be quite good site-wide compliance with the ADF targets, with 88% of rooms achieving full compliance, which is broadly acceptable given the urban context. Some concerns were raised in respect of daylight access for the west-facing studio units within Block A1 and the east-facing kitchens of the ground floor units within Block B2, however the additional information in the Summary Note explains that these units receive lower levels of daylight because of the projecting balconies, which overhang and cause a loss of daylight. However, noting that private amenity space should be provided for all residents, and that the amenity spaces themselves would receive very good levels of daylight (as demonstrated by the assessment where no balconies are proposed, which would result in much higher ADF levels internally), in the

context of the scheme as whole this is considered to be acceptable. It is further noted that the main living areas of the studio flats within Block A1 would receive significantly higher levels than the flat as whole, because of the deep layout of these units, with the bedroom (primarily for use at night) positioned away from the window to maximise light into the remainder of the room.

- 15.25 On the basis of the above, whilst there are some units which would not achieve the recommended BRE targets, when the development is considered as a whole within an urban context, it is considered that the proposal would have adequate access to daylight.
- 15.26 Annual probable sunlight hours (APSH) is a measure of sunlight that a given window may expect over a year period. The BRE guidance recognises that sunlight is less important than daylight in the amenity of a room and is heavily influenced by orientation. North facing windows may receive sunlight on only a handful of occasions in a year, and windows facing eastwards or westwards will only receive sunlight for some of the day. Therefore, BRE guidance states that only windows with an orientation within 90 degrees of south need be assessed. BRE guidance recommends that the APSH received at a given window should be at least 25% of the total available, including at least 5% in winter.
- 15.27 As the proposal is orientated on a predominantly north-south axis, the main façades have predominantly easterly and westerly aspects. This lowers the expectation for good sunlight amenity, but allows all the windows to potentially receive sufficient sunlight. This is reflected in the APSH analysis which indicates that 117 of the 294 main living room areas achieving the recommended 25% of total APSH with at least 5% in winter (40% of units), however, it is recognised that of the rooms which fail to meet the target, 12 are compliant for Annual Probable Sunlight Hours (but not Winter Probable Sunlight Hours), and a further 61 experience only a very minor APSH non-compliance with figures ranging from 18-24% APSH.
- 15.28 Overall, this is considered to be acceptable, noting the trade-offs required when utilising projecting balconies, and the general orientation, which maximises the number of units with some access to natural light, especially for the proposed communal courtyard which would receive at least 2 hours of direct sunlight on March the 21st for 97.0% of this space. As such, it is considered that access to sunlight is good site-wide and generally complies with BRE guidance, and the scheme as a whole would provide a good level of amenity in regards to access to light.

## 15.29 Play Space

- 15.30 The proposed development, as noted above, includes a large communal courtyard area which would act as the focal point of the development for residents, providing shared access to a large area of well-landscaped amenity space, and access to play equipment for all residents.
- 15.31 Using the GLA's Child Yield Calculator, the proposed development would be expected to generate 55.3, 40.8, 16.4 and 8.6 children aged less than 5 years old, 5-11 years old, 12-15 years old and 16-17 years old respectively. As such, in accordance with Policy S4 of the London Plan, which requires 10m<sup>2</sup> of play space for each expected child, the proposal should provide 1211m<sup>2</sup> of play space on-site.
- 15.32 The proposal includes 961m<sup>2</sup> of on-site play space for young children (0-5 and 5-11) within the podium garden and the central communal courtyard, with the remaining 250m<sup>2</sup> to be accommodated by the existing recreational park to the south. The park provides facilities well-suited to the play space requirements of older children, such as large areas of open space and a MUGA, and is less than 350 metres from the site.
- 15.33 Policy S4 of the London Plan advises that off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Owing to the site's excellent access to nearby existing play facilities for older children, in this instance it is considered that an off-site contribution towards informal play equipment for older children, including potential upgrades to the existing MUGA, would be acceptable in this instance in lieu of on-site provision. This contribution would be secured through the s106 agreement. In addition, suitable play spaces and equipment would be secured by way of condition to ensure it achieves substantial compliance with the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation' (September 2012).

## 15.34 Noise, Air Quality and Microclimate

- 15.35 The guidance within *BS 4142:2014+A1:2019* indicates suitable noise levels for various activities within residential and commercial buildings and the relevant

sections of this standard are shown in the following table:

| ACTIVITY                   | LOCATION    | 07:00 TO 23:00      | 23:00 TO 07:00     |
|----------------------------|-------------|---------------------|--------------------|
| Resting                    | Living Room | 35 dB LAeq, 16 hour | -                  |
| Dining                     | Dining Room | 40 dB LAeq, 16 hour | -                  |
| Sleeping (daytime resting) | Bedroom     | 35 dB LAeq, 16 hour | 30 dB LAeq, 8 hour |

15.36 Guidance further advises on suitable sound levels for outdoor amenity areas, advising that to avoid annoyance to most people, a level of less than 55 dB LAeq should be targeted. The standard does also acknowledge that the above sound levels, based on historic research reported by WHO, should not be taken or used as strict limits.

15.37 Across the northern edge of the site, average noise levels during the daytime (0700-2300hrs) were 74 dB LAeq, average noise levels during the night-time (2300-0700hrs) were 72 dB LAeq, and typical maximum noise levels during the night-time were 77 dB LAmax.

15.38 Across the southern edge of the site, average noise levels during the daytime were 68 dB LAeq, during the night-time were 61 dB LAeq, and maximum noise levels during the night were 76 dB LAeq (when trains pass by).

15.39 If acceptable internal noise levels can be achieved in 'worst case' habitable rooms, subject to mitigation, then it follows that acceptable internal noise levels can be achieved in all other habitable rooms of the development using similar glazing and ventilator types.

15.40 It has been further demonstrated that noise levels in all gardens at the site could meet the BS8233 recommended levels for noise provided that an imperforate 1.8m high barrier with a minimum surface mass density of 10kg/m<sup>2</sup> is used at the north of the site between the podium garden and Plumstead Road, and this would be secured by condition.

15.41 The proposed development is located within the Royal Borough of Greenwich Air Quality Management Area (AQMA) which has been declared for exceedances of the annual mean Air Quality Objective (AQO) for nitrogen dioxide (NO<sup>2</sup>) and the 24-hour mean AQO for particulate matter with a diameter of less than 10µm (PM<sub>10</sub>). The proposed development is also located within an area identified as experiencing elevated pollutant concentrations, largely as a result of vehicle movements on Plumstead Road, and is located within the Greater London Authority focus area 'Woolwich and Woolwich Arsenal A205 Woolwich Rd/A206 Plumstead Rd'. Subsequently, there is potential for the development to introduce future site



users to poor air quality, as well as to cause adverse impacts on existing pollution levels at nearby sensitive receptors. An Air Quality Assessment (AQA) has therefore been undertaken to quantify pollution levels across the site, consider its suitability for the proposed end-uses, and assess potential impacts as a result of the development.

- 15.42 The analysis within the revised AQA (June 2021) sets out that pollutant levels across ground floor areas of the proposed College, adjacent to the Plumstead Road façade, were predicted to be within 5% of the relevant annual mean AQO for NO<sub>2</sub>, and therefore mitigation is required to reduce long-term pollutant exposure. To ensure good air quality within the college, and near to the main entrance, the entire college building will be fully mechanically ventilated via roof mounted air handling units with intake from the southern end of the building's roof (facing away from Plumstead Road). The northern façade does not require opening windows (except where occupants may deem this necessary for their environment) and will have a very low impact on air permeability. To further reduce egress from the front entrance the design incorporates a lobby, which under slight negative pressure from the ventilation system will avoid the egress of outdoor air, thereby maintaining good levels of air quality internally.
- 15.43 All remaining sensitive locations, including all residential uses, were predicted below the relevant AQOs and are therefore considered suitable for the proposed end-use without further mitigation measures.
- 15.44 The AQA further sets out that total development pollutant emissions associated with both road vehicle and energy emissions are below both the development specific Transport Emissions Benchmark (TEB) and Building Emissions Benchmark (BEB) by a combined total of 944.27kg/year, and therefore the proposed development would be Air Quality Neutral.
- 15.45 A Pedestrian Wind Environment Statement (PWES) has been submitted, in accordance with Policies D9 and D8 of the London Plan, to ensure the environmental impacts of the proposed tall buildings are considered. Wind and microclimate conditions are generally assessed using Lawson's Comfort Criteria, which characterises wind conditions by way of describing whether the area would be suitable for sitting, standing, strolling or walking, or whether it would be uncomfortable or unsafe. Generally, conditions are required to be suitable for strolling throughout the year for the outdoor trafficable areas within and around the development site which are to be mainly used as pedestrian walkways. For the entrances of the proposed development, the wind conditions are recommended to be suitable for standing activities throughout the year, whilst the sitting criterion is the suitable level of wind comfort for any outdoor communal seating and play

areas, particularly during the summer season. The standing criterion is the recommended criterion for the proposed private balconies during the summer season.

- 15.46 The assessment of existing site conditions contained within the PWES indicate that the existing low-rise buildings on the site are not exposed to prevailing south-westerly winds, and benefit from partial sheltering from the surrounding buildings to the west. As such, the wind conditions for the existing site are considered to be safe for pedestrian use year-wide and suitable for the present pedestrian activities throughout the site, which involve standing or sitting throughout the year.
- 15.47 The results of this assessment for the expected wind conditions affecting the proposed development indicate that the development would be relatively exposed to prevailing south-westerly winds. As a result, there is a slight impact on the wind comfort within certain areas of the site. However, wind conditions within and around the site are still expected to be safe for pedestrian use throughout the year. The wind microclimate outside all main entrances of the development are likely to be suitable for ingress/egress throughout the year without mitigation. Wind conditions for all thoroughfares proposed within the site are expected to be suitable for intended pedestrian activities, involving leisure walking throughout the year.
- 15.48 Subject to the inclusion of soft landscaping measures, wind conditions at the proposed courtyard and the garden areas of Block A can be sufficiently mitigated, and would be suitable for stationary activities, involving sitting and standing throughout the year, particularly during the summer season, when it would be used most intensively.
- 15.49 The proposed development is expected to result in some wind acceleration along the Villas Road to the east and Invermore Place to the west, however wind conditions are expected to be suitable for the use of these areas as pedestrian thoroughfares throughout the year, and it is noted that private amenity areas are generally well-protected. Away from these locations, the proposed development is not expected to significantly affect the wind conditions compared to those currently experienced.
- 15.50 On this basis, and subject to securing the mitigation measures outlined in the Design and Access Statement and PWES, it is considered that the proposal would not result in poor wind or microclimate conditions and would provide an acceptable level of amenity in this regard.

## **15.51 Accessible Homes**

- 15.52 As required by the London Plan, all residential units will be accessible, with 90% meeting Building Regulations requirement M4(2) 'accessible and adaptable dwellings'. The remaining 10% will meet Building Regulation requirement M4(3) 'wheelchair user dwellings' which are designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users from the start. This equates to 30 wheelchair homes, with 14 provided within the private rent units, 10 within the affordable rent units and 6 within the shared ownership units, across all unit sizes.
- 15.53 It is further important to consider the accessibility of the college against Part M of the Building Regulations, to ensure that appropriate measures are in place surrounding the proposed buildings to ensure safe and convenient access for those with mobility issues.
- 15.54 The submitted information has been reviewed by the Council's Occupational Therapist team, who have confirmed that whilst there are some areas of non-compliance, related to bathroom layouts, door opening widths and entrance canopies, the proposals broadly comply with the requirements of Policy D5 of the London Plan, and these issues can be addressed at the submission of details. As such, a condition which requires the submission of details ensuring compliance with Policy D5, and which requires the submission of further details at a post-approval stage, have been recommended.
- 15.55 Standard 12 of the Mayor's Housing SPG advises that cores should generally be limited to eight units. Standard 12 should not be applied mechanically and other considerations, such as access to natural light, corridor width and number of occupants per core should also be taken into consideration. In terms of units per core, it is noted that only 4 floors of Block B2 exceed the London Plan recommended limit of 8 homes per core, and only by 1 home (there are 9 homes accessed on these levels of this core). This equates to 12% of the total number of proposed homes, with the remaining 88% being accessed off cores that serve the recommended maximum 8 homes or less. In addition, corridors to Blocks B1 and B5 and the upper levels of Block B3 benefit from natural light.
- 15.56 On the basis of the above, it is considered that overall access within and around the site would be acceptable, and internal movement within the buildings, and within the shared access areas would be acceptable.

## **15.57 Fire Safety**

- 15.58 In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan states that all proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside spaces for fire appliances to be positioned on, provide suitable access and equipment for firefighting which is appropriate for the size and use of the development, and provides spaces which are appropriate for use as an evacuation assembly point.
- 15.59 Buildings should be designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire by being constructed in an appropriate way to minimise the risk of fire spread. This should include appropriate fire alarm systems, passive and active fire safety measures, suitable and convenient means of escape and an associated robust evacuation strategy which can be periodically updated and published, and which all occupants can have confidence in.
- 15.60 Compliance with Policy D12 has been demonstrated through the submission of two fire statements; one covering the college and the other covering the residential element of the development, including floor plans showing the means of escape in an emergency, fire alarm and detection systems, and access for firefighting Vehicles which can be achieved from Invermore Place, Villas Road or the New Street. Owing to the height of Blocks A1, B1, B3 and B5 (over 18 metres high) a fire-fighting shaft would be provided for each of these blocks. Each shaft should comprise of a 1100mm wide fire-fighting stair, a ventilated fire-fighting lobby provided in the form of the protected corridor, a fire-fighting lift, and a dry rising main with outlets in the stair on all floors. Fire appliance access is proposed to be granted within 18 metres of, and within sight of, the entrances to the fire-fighting shafts and the entrances to the commercial units.
- 15.61 Whilst it is recognised that the fire strategy for the college includes most of the required information, little detail is provided on construction methods and that there is no detail on the provision of fire evacuation lifts, which must be provided in each building core and shown on drawings, and generally that some of the external product standards are less ambitious when compared to the residential component. In addition, it is not clear where building occupants could evacuate to in the event of a fire.
- 15.62 In addition, for the residential elements, little detail is provided on construction methods, there is no provision of fire evacuation lifts and there is little information on space for fire appliances. In addition, there is no information on the ongoing management of the development in terms of fire safety.

15.63 Additional information, in the form of a Evacuation Lift Strategy & Muster Points (June 2021) to address these concerns, and compliance with the revised Fire Strategy Reports would be secured by way of condition, and an informative will be attached reminding the applicants of their responsibilities under Part B of the Building Regulations, in accordance with the advice received from the London Fire Brigade. On this basis, the proposal is considered acceptable insofar as it relates to fire safety.

#### 15.64 **Secured by Design**

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

### 16. **Impact on Residential Amenity**

16.1 Policy DH(b) of the Royal Greenwich Local Plan (Protection of Amenity for Adjacent Occupiers) sets out that new developments will only be allowed where it can be demonstrated that the proposed development 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 unneighbourly sense of enclosure.

16.2 Policy E(a) sets out that planning permission will not normally be granted where a proposed development or change of use would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit.

16.3 Policy D13 of the London Plan further states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

- 16.4 Policy D14 of the London Plan (Noise) sets out that proposals should mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes. Proposals should first seek to separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials, in preference to sole reliance on sound insulation. Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles, promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.
- 16.5 Furthermore, the Mayor's Housing SPG sets out that proposals should limit the harm to neighbouring properties, whilst recognising that to comply with Policies seeking the optimal use of land, some development proposals may be allowed even where harm has been identified.

#### 16.6 **Daylight and Sunlight**

- 16.7 The Daylight and Sunlight report sets out that a loss of light to neighbouring properties has been assessed based on the following tests; the 25 Degree Line, Vertical Sky Component (VSC) (and retained VSC), No-Sky Line (often referred to as Daylight Distribution) and Average Daylight Factor (ADF). In addition, two tests of sunlight loss were conducted; an assessment of Sunlight Access (annual Probable Sunlight Hours – APSH) and an assessment of overshadowing.
- 16.8 When assessing impacts related to loss of natural light, the Mayor's Housing SPG advises that avoiding harm to habitable rooms is the priority, which are usually defined as any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition of habitable rooms, and in some circumstances, a large kitchen or if the kitchen forms part of a living/kitchen/dining room (LKD), it would be counted as a habitable room. There is no statutory definition or size requirement for kitchens to be counted as a habitable room, however the Mayor's Housing SPG sets out that any kitchen more than 13m<sup>2</sup> should usually be counted.

- 16.9 The 25 Degree Line test is a simple initial assessment, where a plane is drawn from the midpoint of the window under assessment at an angle of 25° from the horizontal. If the plane would intersect any part of the proposed development, then the 25 Degree Line test is failed, and the first test of VSC should be conducted.
- 16.10 VSC is a measure of the amount of sky visible from the midpoint of a window, where the area of visible sky is expressed as a percentage of an unobstructed hemisphere of sky. This percentage therefore represents the amount of daylight available for that particular window, and BRE guidance recommends that a VSC of 27% should be maintained, however, this is not always achievable in dense urban environments. In addition to the amount of sky visible, Relative VSC (rVSC) is a measure of the reduction of visible daylight, and BRE guidance recommends that a development proposal would have a negligible impact if the reduction in rVSC is between 0 – 20%, would have minor significance if the reduction is between 21 – 30%, would have moderate significance if the reduction is between 31 – 40% and would have substantial significance if the reduction is above 40%.
- 16.11 A No-Sky Line assessment divides those areas of the working plane (850mm above floor level) which can receive direct skylight, from those which cannot. A room may be adversely affected if, following development, the area of the working plane that can receive direct skylight is less than 0.8 times its former value.
- 16.12 Annual probable sunlight hours (APSH) is a measure of sunlight that a given window may expect over a year period. The BRE guidance recognises that sunlight is less important than daylight in the amenity of a room and is heavily influenced by orientation. North facing windows may receive sunlight on only a handful of occasions in a year, and windows facing eastwards or westwards will only receive sunlight for some of the day. Therefore, BRE guidance states that only windows with an orientation within 90 degrees of south need be assessed. BRE guidance recommends that the APSH received at a given window should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period.
- 16.13 Having regard to the size of the proposal, and the character of the surrounding area, the Daylight and Sunlight Assessment has assessed impacts on Invermore Place, Crown House, 1-5 Villas Road, 7 Villas Road, 98-108 Polthorne Grove, 1-23 Clendon Way and 27-31 Walmer Terrace.

#### 16.14 Invermore Place

- 16.15 Invermore Place, immediately to the west of the application site, comprises a four-storey residential building containing double-stacked maisonettes, with front doors at ground floor level and deck access at second floor level for the upper-floor maisonettes, which results in windows at this level facing the site being set back from the façade with an overhang. Floor plans for these properties indicate that the lower floor of each maisonette contains a kitchen facing towards the application site and a living room facing towards the communal open space to the west, with the upper floors containing two bedrooms, one facing east and one facing west.
- 16.16 Relevant to this application are the 54 east-facing windows, serving kitchens and bedrooms. The majority of these windows currently experience very open aspects, reflective of the low-rise nature of the application site, and this is expressed in VSCs of mid to high 30s (where the maximum score is 40% and the baseline target is 27%). It is noted that the applicant has sought to use lower targets of between 15-18% retained, and the Mayor's Housing PPG states that lower targets can be used in more urban environments, recognising that the BRE guidance assumes a suburban character.
- 16.17 All assessed windows would fall below the 27% target set out in BRE Guidance, with access to daylight for windows facing the deck-access at second floor level nearly completely removed and would therefore be significantly noticeable. Windows across the rest of the façade would experience losses ranging from the approximately 30% to 45% and would therefore be of moderate or high significance with all but one window retaining in excess of 18% VSC. Given the relatively low-rise nature of the existing buildings, the properties within Invermore Place have uncharacteristically high levels of daylight access for an urban environment on a town centre boundary, and it is therefore recognised that any substantial redevelopment of the application site would lead to some loss of daylight. Moreover, because of the overhang at second floor level, any development which optimises capacity would result in significant impacts to windows facing the deck-access.
- 16.18 It is further noted that all properties within Invermore Place are dual-aspect through-dwellings, with east and west facing windows, and that half of the affected windows serve small kitchens, separate from the principal living room which faces east, and these kitchen windows are therefore considered to be of lower importance. On this basis, whilst the impact on the affected windows is considered to be significant, the impact on the overall quality of accommodation for occupants of Invermore Place would be low.



### 16.19 Crown House

16.20 Crown House is located to the north-west of the site, facing Plumstead Road and accessed from a short cul-de-sac, and is used for residential purposes. 16 windows have been assessed and site layouts have been assumed based on external observations.

16.21 The majority of windows within this property experience small reductions in VSC that are in accordance with the BRE guidelines. There are four small east-facing windows that experience larger proportional VSC reductions, however, these appear to be secondary windows to dual aspect rooms, where the principal windows do not directly face the site. The principal windows retain VSC values in excess of 24% and therefore the overall impact on the spaces will not be material. This is supported by the NSL analysis, which shows that reductions will be negligible and 7 of the 9 rooms assessed will not experience any NSL loss.

16.22 All the rooms which have a window orientated within 90 degrees due south and material for assessment experience fully BRE compliant changes in APSH. In accordance with BRE Guidance the effects will be unnoticeable.

### 16.23 1-5 Villas Road

16.24 1-5 Villas Road are a small group of two-storey terraced houses to the north-east of the application site at the Junction of Plumstead Road with Invermore Place. Site layouts are not known but based on external observations, it is considered that the ground floor site facing windows serve kitchens, the windows on the first floor serve bedrooms, and the living rooms are therefore located on the rear elevation of the building and unaffected by the proposed development. The assessment considers the effect on 9 windows serving 9 site-facing rooms. As above, these properties experience very open aspects reflected in existing VSC scores of 29.12% to 34.00%.

16.25 1 Villas Road retains VSC scores of 21.1% to 23.14%, 3 Villas Road retains VSC scores of 18.38% to 20.15% and 5 Villas Road retains VSC scores of 15.03% to 17.35%. These represent substantial significance in terms of the loss of access to natural daylight to these windows, and exceeds the recommended BRE guidance.

16.26 It is noted, however, that the properties affected are all dual-aspect houses, and that the principal living room appears to face east (away from the application site) and would therefore be unaffected. On this basis, it is considered that the impact on the affected windows would be substantial, however the impact to the overall quality of accommodation would be low.

## 16.27 7 Villas Road

16.28 7 Villas Road is a three-storey block of flats sited to the east of the application site at the junction of Villas Road and Polthorne Grove. Based on the layouts of these flats, it has been identified that of the 28 windows, the 12 directly facing the site serve 6 LKDs and 6 bedrooms. There are balconies overhanging the LKDs which have been omitted from the analysis in accordance with BRE Guidance.

16.29 The 12 windows facing the application site experience proportional VSC reductions between 50% to 60%, which exceeds default BRE Guidance and would have a substantial impact. However, as the rooms are dual aspect proposal does would cause any noticeable change to the distribution of skylight within the room as day. It is also of note that the side elevation windows serving these LKDs all retain VSC scores of over 24%, which would be relatively good for an urban environment.

16.30 In addition, all the rooms which have a window orientated within 90 degrees due south, and are therefore material for assessment for sunlight, will experience fully BRE compliant changes in APSH and the proposal will therefore not cause a noticeable impact on sunlight.

16.31 As such, whilst some windows would be substantially affected in terms of daylight, it is considered that the overall impact on the flats within 7 Villas Road would be low.

## 16.32 98-108 Polthorne Grove

16.33 98-108 Polthorne Grove is a four-storey residential block of flats with deck access. The submitted analysis considers the effect on 43 windows serving 30 site facing rooms. The property has overhangs above the first and third floor windows which have been omitted in accordance with BRE Guidance.

16.34 Whilst it is recognised that some windows, as a result of the proposed development, would see reductions reduce to below 27% VSC where existing VSC is higher, it is recognised that where this occurs, the proportional loss to VSC would be less than 20%, and would therefore not be significant. Where windows currently experience low access to daylight, these windows would be more severely affected, however, noting that existing levels are low due to overhangs in the building's design, it is considered that the impact would not be noticeable.

### 16.35 1-23 Clendon Way

16.36 Located to the east of the site, 1-23 Clendon Way is 4-storey property comprised of stacked maisonettes, similar to Invermore Place (discussed above). It has balconies at second floor level serving the top-level maisonettes, together with bricked projections to provide privacy from the adjacent units. These balconies and projections have been omitted from the analysis to understand their effects in accordance with BRE guidance.

16.37 The typical layout of the lower maisonette units indicate a ground floor site-facing small kitchen and a dual aspect living room (where the living room has a window facing the site and on the opposite elevation), together with a site-facing bedroom and bathroom/WC at first floor level. On the second and third floors, the layouts show there is a site-facing living room at second floor and a site-facing bedroom & bathroom/WC at third floor.

16.38 The site-facing rooms receive unusually high levels of VSC and NSL in the existing situation, because of the relatively low-rise nature of the existing college buildings, and the proposal results in some significant impacts, exceeding BRE guidance targets, to windows facing the application site. On an unfettered façade, the proportional VSC reductions to the windows range from 30% to 47.6% and proportional reductions in NSL of up to 62%.

16.39 However, when discounting the effect of the balconies and roof overhangs, as per BRE guidance, whilst proportional reductions in VSC to the windows serving the flats are in the region of 30% to 45%, and would therefore be moderate to substantial, the retained VSC values to all windows range from 17.5% to 27.9%, which is considered to be acceptable in this instance, and would not cause significant harm to occupiers of these properties.

### 16.40 27-31 Walmer Terrace

16.41 27-31 Walmer Terrace is located to the south-east of the application site, on the opposite side of the railway line. The analysis demonstrates that the proposal would not have a noticeable impact on access to natural light for units within these properties.

### 16.42 **Outlook**

16.43 Owing to the low-rise nature of the existing development site and having regard to Policy D3 of the London Plan, it is recognised that there would be some loss of aspect for nearby properties as a result of any comprehensive redevelopment of the site, however as discussed above, the impact on access to natural light is considered to be overall low.

- 16.44 In addition, it is considered that the variation in heights between buildings with visible gaps where the skyline can be seen from the lower floors of neighbouring buildings both allows the expressive architecture of each block to be appreciated but gives the proposal a human scale which reduces the feeling of enclosure, compared to a monotone or bland palette. As such, whilst there would be some loss of outlook, it is considered that appropriate measures have been taken to lessen its impact on the outlook of surrounding buildings.
- 16.45 It is further recognised that the majority of existing dwellings in the locality are dual aspect, with the properties on Invermore Place and Villas Road largely benefitting from both easterly and westerly views which reduce the reliance on one aspect to provide a source of outlook.
- 16.46 On this basis, it is considered that whilst the proposal would have a noticeable impact on the outlook on all dwellings facing the site, this would not be so significant as to warrant a refusal, would not significantly harm the amenity of nearby residential properties and the proposal is therefore considered to be acceptable in this regard.

#### **16.47 Noise and Disturbance**

- 16.48 The application site falls within a largely residential area, notwithstanding that the existing use of the site is as a college, and the main sources of noise in the area are Plumstead Road and the railway sidings to the south. Maximum noise levels at the south of the site were largely dictated by fast train passes on the railway line and sporadic vehicle movements on Vilas Road and Invermore Place, whilst maximum noise levels at the north edge of the site were generally dictated by vehicle movements on Plumstead Road. Background noise levels (LA90) across the site were dictated by constant road traffic noise from the surrounding roads, but generally, areas of the development at the northern and southern edges of the site will be subject to the highest noise levels.
- 16.49 Across the northern edge of the site, average noise levels during the daytime (0700-2300hrs) were 74 dB LAeq, average noise levels during the night-time (2300-0700hrs) were 72 dB LAeq, and typical maximum noise levels during the night-time were 77 dB LMax. Across the southern edge of the site, average noise levels during the daytime were 68 dB LAeq, during the night-time were 61 dB LAeq, and maximum noise levels during the night were 76 dB LAeq (when trains pass by). As such, it is recognised that the existing noise environment, largely as a result of the highly-used Plumstead Road, results in relatively high background noise levels for an otherwise residential area.

- 16.50 Whilst each case is assessed on its own merits, the Council's Environmental Protection Team advise that development proposals should seek, either through passive design or through the use of mitigation measures, to ensure that the existing background sound level will not increase when measured one metre from the façade of the nearest noise sensitive premises.
- 16.51 In order to achieve this, mechanical plant equipment and ventilation should be designed, or the noise from the plant should be attenuated, so that it is 10dB below the existing background level (LA90 15min), assessed in accordance with British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound.
- 16.52 BS 4142:2014+A1:2019 provides a method of assessing the impact of a source of industrial or commercial sound including sound from industrial and manufacturing processes, fixed installations, the loading and unloading of goods, vehicles and mobile plant, and is therefore appropriate for this assessment.
- 16.53 The ventilation scheme for the project is Mechanical Ventilation with Heat Recovery (MVHR) and therefore, there will be no background ventilators in the external façades. The MVHR system would be selected to ensure that noise from air supply and extract ductwork does not exceed acceptable levels within habitable rooms, and Appropriate specifications for noise levels from the MVHR system (operating at typical maximum duty) would to ensure that noise is no greater than 30 dB LAeq,T at 1.5m from bedroom and living room windows, and 35 dB LAeq,T at 1.5m for other habitable room windows. These details would be secured by condition.
- 16.54 Further, as a result of redevelopment, there will be an increase in movements and general activity across the site, with the introduction of activity later in the day, early in the morning, and at weekends, which would therefore likely result in some additional disturbance. However, residential uses are unlikely to generate significant levels of noise over and above site existing site conditions, and when compared to other non-residential uses, given the existing noise profile of the area is dominated by vehicle and train movements at either end of the site. On this basis, the proposal is considered acceptable in terms of its impact on amenity in terms of noise.

## **17. Transport, Parking and Access**

- 17.1 Policy T1 of the London Plan (Strategic approach to transport) seeks development proposals to facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of

land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

- 17.2 Policy T2 of the London Plan (Healthy Streets) requires development proposals to demonstrate how they will reduce the dominance of vehicles on London's streets whether stationary or moving, be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 17.3 Policy T4 of the London Plan (Assessing and mitigating transport impacts) sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments or statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 17.4 Policy T4 further explains that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.
- 17.5 Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.
- 17.6 Developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
- 17.7 Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to

provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking.

- 17.8 The maximum car parking standards, disabled persons parking, and the provision of electric or other Ultra-Low Emission vehicles are set out in Policy T6.1 to Policy T6.5, however it should be noted that for all development types in PTAL 5 or 6, or within the Central Activities Zone, proposals are expected to be car-free.
- 17.9 Policy T6.1 (Residential parking) states that new residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category. Table 10.3 is reproduced below:

| Location   | Number of beds | Maximum parking provision*            |
|--|----------------|---------------------------------------|
| Central Activities Zone<br>Inner London Opportunity Areas<br>Metropolitan and Major Town Centres<br>All areas of PTAL 5 – 6<br>Inner London PTAL 4 | All            | Car free~                             |
| Inner London PTAL 3  | All            | Up to 0.25 spaces per dwelling        |
| Inner London PTAL 2<br>Outer London Opportunity Areas  | All            | Up to 0.5 spaces per dwelling         |
| Inner London PTAL 0 – 1  | All            | Up to 0.75 spaces per dwelling        |
| Outer London PTAL 4  | 1 – 2          | Up to 0.5 - 0.75 spaces per dwelling* |
| Outer London PTAL 4  | 3+             | Up to 0.5 - 0.75 spaces per dwelling* |
| Outer London PTAL 2 – 3  | 1 – 2          | Up to 0.75 spaces per dwelling        |
| Outer London PTAL 2 – 3  | 3+             | Up to 1 space per dwelling            |
| Outer London PTAL 0 – 1  | 1 – 2          | Up to 1.5 space per dwelling          |
| Outer London PTAL 0 – 1  | 3+             | Up to 1.5 spaces per dwelling^        |

- 17.10 Policy T6.1 sets out that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling should be available from the outset and these spaces must be for residents' use only (whether M4(2) or M4(3) dwellings), not be allocated to specific dwellings, unless provided within the curtilage of the dwelling, and explains that these spaces should count towards the maximum parking provision for the development.
- 17.11 Policy T6.5 (Non-residential disabled persons parking) also sets out that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with and designated bays should be marked up as disabled persons parking bays from the outset.
- 17.12 Policy T6 further states that adequate provision should be made for efficient deliveries and servicing and emergency access. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.
- 17.13 Policy IM(c) of the Royal Greenwich Local Plan (Parking Standards) states that developments must provide the minimum level of car and cycle parking provision in accordance with the requirements of the London Plan, ensuring an appropriate level of parking is provided for people with disabilities and parking is provided for servicing, collection points and waiting areas if necessary. Policy IM(c) further states that developments in areas of high Public Transport Accessibility Levels (PTALs) and within Controlled Parking Zones (CPZs) should be car free.
- 17.14 Policy IM(b) of the Royal Greenwich Local Plan (Walking and Cycling) requires new development to integrate with existing footpaths and cycle paths, to promote walking and cycling safety, and to have regard to the Royal Borough's Cycling Strategy.
- 17.15 The proposed development includes 39 and 5 long stay-spaces and 70 and 4 short-stay spaces for the college and commercial unit respectively, which is considered to be acceptable. The residential element of the scheme includes 529 long stay spaces, arranged into six cycle stores distributed relatively



evenly around the site and 7 short stay spaces. This is considered to be an acceptable level of provision which would be secured by condition, noting that the short-stay cycling provision falls one short of the require standard, and this additional space can be controlled by condition.

- 17.16 The residential element would be car-free, except for blue-badge parking, for which 3% (9 spaces) would be provided at the outset. The residential element of the scheme would be car-free, expect for blue badge parking provision, which will be available for 3% (9) of the total residential dwellings from the outset of occupation, with 6 spaces provided on New Street and 3 provided on Invermore Place. 12 spaces are proposed for use by the college, 10 standard car parking spaces on New Street, a dedicated inset parallel bay for larger vehicles (e.g. minibus) and one blue badge space on Invermore Place (noting that the spaces on Invermore Place could be used by any blue-badge holder at any time).
- 17.17 Having regard to the high PTAL (6a), and policy T6 and T6.1 of the London Plan, which together require car-free developments in areas of excellent public transport accessibility and require blue-badge parking to be provide at the outset, it is considered that the proposed level of residential car parking is acceptable. On-street car parking is subject to restrictions, and the controlled parking zone (Plumstead Station CPZ) covering the surrounding roads will need to be extended to cover the site, and future residents will be restricted from applying for parking permits within the royal borough. The Plumstead Station CPZ operate from 09:30-11:00, Monday-Friday, and its primary function is to prevent commuters using Plumstead Station from parking in the surrounding residential streets in the morning. As such, following redevelopment, it would be possible for future occupants to leave for work prior to 09:30 and to return in the evening, avoiding the times when the CPZ restrictions apply. To prevent this from occurring, it is necessary to extend the hours of operation of the CPZ, subject to consultation to amend the Traffic Order controlling the CPZ, so that the restrictions come into force earlier. In this regard, it is noted that the restrictions for Woolwich Arsenal and Woolwich B CPZs start at 08:30 whilst Plumstead Station CPZ starts at 09:00, and one of these earlier times is recommended. These provisions would be secured through the s106 agreement, and together are considered sufficient to prevent on-street parking arising from the proposed redevelopment.
- 17.18 Parking for the college represents a significant reduction of on-site parking, from 87 to 12 (a reduction of 75 spaces), and would be used by employees of the college only. Owing to the excellent public transport accessibility of the site, the proposal should seek to minimise the level of onsite car parking provision to the minimum amount possible, whilst ensuring that this does not

prevent the college from operating successfully. It is of relevance that the application site is one of eighteen campuses operated by LSEC (11 school sites and 7 FE / HE sites across London and the South East). The group educates approximately 13,000 learners and has approximately 3,500 staff across its 18 sites. It operates as a single organisation sharing resources, staff, services and facilities and as a result, the group share, move, travel and deliver a host of services and equipment across the 18 sites.

- 17.19 It is also of relevance that LSEC operate a car-sharing scheme for staff, who may use their own vehicles, as well as the college having access to four pool cars. The supporting information sets out that the pool cars are typically used by staff who use public transport to get to and from work, but at the same time need to travel between sites. LSEC also utilise four mini buses, which are used to move both staff and students between sites or to take students on outings, visits and workplace experiences across the south east, and LSEC further use four transit type vans for moving teaching equipment across their sites.
- 17.20 It should be further noted that LSEC's Greenwich Campus has a number of students with special educational needs either based at the site or who travel to the site, and these students require appropriate arrangements for drop-offs and collections by specifically chartered vehicles (inc. taxis) and adapted vehicles to carry physically or mentally disadvantaged students. The number of drop-offs and collections varies, with these students requiring the specifically chartered transport to be parked as close to the entrance at the start and end of days as possible, to support one to one transit from the college to the vehicle.
- 17.21 As such, it is recognised that both the existing and proposed college requires some level of car parking to function at its highest level, to allow staff (who often work across multiple campuses on a single day) to move conveniently across south-east London without disrupting their timetables. It is noted that TfL's response raises concerns with the level of car parking for the college and sets out that the college should be car-free, except for blue-badge parking, and this is echoed in the GLA's stage 1 response.
- 17.22 Whilst these concerns regarding car parking are noted and Policy T6 of the 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 users. Having regard to the comments raised by the council's Highways and Transport officer, it is recognised that there is still some on-street parking availability in the area, however generally there is heavy demand for parking near the site and on-street parking is therefore

considered to be at a premium during the day, for which any additional demand will exacerbate existing problems for businesses and visitors.

- 17.23 As such, it is considered that if no parking were provided for the college element, this could lead to an increase in on-street parking during the day and evening (after 11:00, when parking restrictions no longer apply), thereby worsening existing conditions for local residents, whilst also providing a less attractive offer for prospective teachers who may require some flexibility in the approach to moving between campuses. It is also agreed that some level of operational parking is required to allow the college to function at its optimum capacity, and the proposed development would result in a very significant reduction of 75 spaces, from 87 to 12, which is a clear benefit to the proposal and would promote more active and sustainable modes of transport.
- 17.24 On the basis of the above, it is considered that the proposal is acceptable in terms of its car parking provision, noting that the on-site parking would be managed through a Car Park Management Plan, secured by condition, and overall parking levels are considered to support an appropriate transition from car-reliance to relying predominantly on public and active transport.

## **18. Waste and Recycling**

- 18.1 Policy SI 7 (Reducing waste and supporting the circular economy) and Policy D6 (Housing quality and standards) of the London Plan require developments to be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food. Policy H5 of the Royal Greenwich Local Plan also states that new housing should make adequate provision for waste storage and collection.
- 18.2 The majority of delivery and servicing will take place from the new internal link road, however will also occur on Invermore Place and Villas Road. Each residential block has a communal bin store at ground floor level, accommodating refuse, recycling, food waste and textiles, whilst the properties fronting Invermore Place and Villas Road would be provided with individual waste storage within the property's boundary. For flatted accommodation, residents will be required to transport their own waste from their property directly to their nearest bin store, using the passenger lifts where necessary, where they will segregate their waste into appropriately labelled bins. Guidance sets out that the maximum walking distance from each residential unit to the bin stores should not exceed 30 metres (excluding vertical distances), and this has been achieved site wide. The Waste Management Strategy further outlines that communal bin stores will be

designed to *British Standard BS5906:2005 Waste Management in Buildings – Code of Practice standards*, and will therefore include a suitable water point in close proximity to allow washing down, all surfaces to be sealed with a suitable wash proof finish, a suitable floor drain and appropriate lighting and ventilation.

- 18.3 Separate refuse areas are provided for the commercial unit facing Plumstead Way and the proposed college use, however owing to the flexible use sought for the commercial unit, the precise amount of refuse provision is not known. College waste would be stored on-site, compacted, and would be collected from the new internal road through the site.
- 18.4 The above details have been reviewed by the council's waste management team, and are considered acceptable, subject to securing the details through a condition, including compliance with the Waste Management Strategy. A separate strategy will be required for the commercial unit prior to its first use as full details are not currently known.
- 18.5 As such, it is considered that the proposed on-site waste storage and collection facilities are acceptable and would accord with Policies SI 7 and D6 of the London Plan, and Policy H5 of the Royal Greenwich Local Plan.

## **19. Sustainability, Energy and Ecology**

- 19.1 Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation:
- be lean: use less energy and manage demand during operation
  - be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - be seen: monitor, verify and report on energy performance.
- 19.2 Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

- 19.3 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum on-site reduction of at least 35 per cent beyond Building Regulations will be achieved. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
- through a cash in lieu contribution to the borough's carbon offset fund; or
  - off-site, provided that an alternative proposal is identified and delivery is certain.
- 19.4 Moreover, major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- 19.5 In addition, Policy SI 3 of the London Plan (Energy Infrastructure) states that all major development proposals shall explore opportunities to maximise the use of on-site renewable energy generation and incorporate demand-side response measures.
- 19.6 Policy G5 of the London Plan (Urban Greening) states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The Mayor recommends that boroughs seek an Urban Greening Factor (UGF) target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses). In broad terms, the UGF is an assessment of the amount, type and value of natural environment provided on site as a proportion of the overall site area. The assessment assigns each landscape type (e.g. Semi-natural vegetation, intensive green roof to depth of 150mm, extensive green roof to depth of 80mm, amenity grassland, etc...) with a 'factor' (1, 0.8, 0.7 and 0.4 respectively for the landscapes listed above). These factors are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaptation and biodiversity conservation.

- 19.7 Policy E1 of the Royal Greenwich Local Plan (Carbon Emissions) requires all development to reduce demand for energy through its design and incorporate renewable energy generation within the proposal. In addition, all developments with a gross floor area greater than 500 m<sup>2</sup> or residential developments of five or more units are required to connect to an existing decentralised energy network, unless it can be demonstrated that this is unfeasible or unviable, in which case sufficient infrastructure to enable a future connection should be provided.
- 19.8 Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy. For the purpose of the London Plan and Royal Greenwich's Local Plan, CO<sub>2</sub> emissions are expressed as a percentage improvement over Part L of the 2013 Building Regulations.
- 19.9 Relevant modelling output reports (i.e. TER, DER, BRUKL, Overheating, SAP Input, SAP Thermal Bridging) for the Be Lean and Green stages of the energy hierarchy and the GLA's carbon calculators for the different components have been provided. A roof plan showing the location of the PV panels, biodiverse roofs and plant allocated space has been provided and indicative maintenance and operational details of all proposed technologies have been provided.
- 19.10 The regulated Part L1A 2013 carbon dioxide emissions for the residential elements have been calculated to be 290 tonnes of CO<sub>2</sub> per year based on SAP10 carbon emission and the regulated Part L2A 2013 carbon dioxide emissions for the flexible commercial space and the college have been calculated to be 3.7 tonnes and 67 tonnes of CO<sub>2</sub> per year respectively, based on SAP10 carbon emission factors.
- 19.11 A range of energy efficiency measures are proposed, such as improved fabric specification and air permeability, 100% energy efficient lighting for the dwellings and energy efficient lighting with appropriate controls and sensors for the non-residential spaces, accredited construction details (ACDs), external shading from balconies above the dwellings and solar shading and exposed soffits for the college. Further, windows would have g values of 0.4 (North and East residential facades), 0.35 (South and West residential facades) and 0.4 for the flexible commercial space and the college, natural ventilation through openable windows and mechanical ventilation with heat recovery for the whole development, and extract systems especially for the college and cooling for the non-residential spaces are proposed that exceed the minimum requirements of the Part L of the Building Regulations 2013.

- 19.12 These measures, when installed, are predicted to result in a reduction in regulated CO<sub>2</sub> emissions of 13% (equal to 37 tonnes of CO<sub>2</sub>/year) beyond the compliant Part L1A 2013 base case, based on SAP10 carbon emission factors for the residential elements. An improvement of the Dwellings Fabric Energy Efficiency over the Target Fabric Energy Efficiency of 6% is also being proposed.
- 19.13 For the non-residential parts, the measures are predicted to result in a reduction in regulated CO<sub>2</sub> emissions of 25% (equal to 0.9 tonnes of CO<sub>2</sub>/year) and 16% (equal to 11 tonnes of CO<sub>2</sub>/year) for the flexible commercial space and college respectively, beyond the compliant Part L2A 2013 base case, based on SAP10 carbon emission factors.
- 19.14 Site-wide, this would mean that the proposed energy demand reduction measures (Be Lean) would result in a site wide reduction of regulated CO<sub>2</sub> emissions of 14% (equal to 49.1 tonnes of CO<sub>2</sub>/year) beyond the compliant Part L 2013 base case based on SAP10 carbon emission factors.
- 19.15 Measures to reduce the unregulated energy and associated emissions have been investigated and demonstrated in the revised energy report (July 2021). These include smart metering systems, energy efficiency vertical transportation, building user guides and Building Management System (BMS) to assist with the reduction of the unregulated energy usage as well as allow occupants to monitor and reduce their energy usage post-occupation.
- 19.16 Although the incorporation of the ACDs throughout the development is welcomed, the applicant commits in investigating improving the psi value further than what is currently proposed as part of the detailed design, and this requirement will be conditioned. In addition, a higher improvement on DFEE over DFEE should be targeted for all blocks and this requirement will also be conditioned.
- 19.17 In line with the revised Energy Strategy, an investigation into existing or planned District Heating Networks (DHNs) in the vicinity of the proposed site was carried out via the London Heat Map but the ones identified are located at a distance which makes connection unviable. The development will however include designated space for the future provision of the necessary equipment and incoming mains connections, which is welcomed.
- 19.18 The revised report further identifies a number of existing and planned DHNs close to the proposed site including the Royal Arsenal existing DHN operated by SSE and Land bounded by Pettman Crescent, Nathan Way & Hadden Road (Ref: 19/4398/O) which is developed by Berkeley Homes and Peabody. Following communication with the developers of the operational

DHNs, it has been concluded that there is no spare capacity to serve the proposed development.

- 19.19 In addition, the Council is undertaking a detailed decentralised energy techno-economic feasibility (DE TEF) study to explore if a low carbon energy/ heat network could be developed to link all areas with anchor loads across Greenwich Riverside via Woolwich Town Centre extending from Thamesmead/Abbey Wood to Greenwich West and East areas, which could potentially serve over 5,000 homes and bring carbon savings of 65% over 30 years with potential to utilise several secondary heat sources.
- 19.20 A centralised heating system consisted of Air Source Heat Pumps (ASHPs) and gas boilers to provide the peak load of 60%/40% is proposed. The ASHPs would be located on the roof of Block A1 and the gas boilers and associated plant in the ground floor plant in Block A1. No mechanical cooling is proposed for the dwellings, and Thermal buffer/storage is also proposed although final design will be determined at detailed design stage, to be secured by way of condition.
- 19.21 The flexible commercial space would be served by split/multi split ASHPs to provide the space heating and cooling and immersion electric heaters to provide the hot water. Due to the relatively small size of the space in Block A, the proposed energy servicing strategy is accepted.
- 19.22 The College will be served by ambient loop fan coil of ASHPs for the provision of space heating and cooling with temperatures at approximately 25-30C. Hot water would be generated locally through water to water heat pump systems that feed off the ambient loop network. Thermal buffer/storage in the region of 6,000 to 8,000 litres would also be installed to regulate the ASHPs and ensure continuous operation when demand falls during the course of the day.
- 19.23 Due to the different heating and hot water demand and profiles between the College and Residential Blocks, a common central plant to serve the whole development is not proposed. It is proposed, however, that these two centralised plant rooms to be interconnected so that “waste” heat from the college is recovered and utilised within the residential and/or flexible space elements.
- 19.24 Relevant plans and layouts showing the interconnection of the centralised plant rooms within the development have been provided. The plans also demonstrate the zoning where the plants rooms would facilitate connection to an offsite heat network, if available.



- 19.25 A safeguarded provision to the edge of the site for both residential and college components will be coordinated with other external utilities/services at detailed design stage, to be secured through the s106 agreement.
- 19.26 A number of renewable technologies has been investigated with ASHPs and solar PV technologies found to be the most feasible for the proposed development.
- 19.27 A centralised hybrid system of air to water ASHP system with ASHPs and gas boilers providing 60% and 40% of the space heating and hot water respectively. The centralised ASHP system predicts a reduction in regulated CO<sub>2</sub> emissions of 30%, equal to 85.5 tonnes of CO<sub>2</sub>/year (SAP10 carbon emission factors), beyond the compliant Part L 2013 baseline.
- 19.28 In addition, solar PV panels on the roof of residential Blocks B1, B3 and B5 with total capacity of 71.25kWp are proposed to generate 60.9 MWh/year and reduce the CO<sub>2</sub> emissions by 5%, equal to 14.2 tonnes of CO<sub>2</sub>/year (SAP10 carbon emission factors), beyond the compliant Part L 2013 baseline. The electricity generated by the PVs would be distributed between all dwellings.
- 19.29 The split/multi split ASHPs proposed to serve the Flexible Commercial space predict a reduction in regulated CO<sub>2</sub> emissions of 16%, equal to 1 tonne of CO<sub>2</sub>/year (SAP10 carbon emission factors), beyond the compliant Part L 2013 baseline. The reversible ambient loop water to water ASHPs proposed for the College predicts a reduction in regulated CO<sub>2</sub> emissions of 23%, equal to 16 tonnes of CO<sub>2</sub>/year (SAP10 carbon emission factors), beyond the compliant Part L 2013 baseline.
- 19.30 In addition, a solar PV system with 24kWp capacity is proposed to be installed on the roof of the College building. The solar PV will generate 19.5MWh of electricity and predicts a reduction in regulated CO<sub>2</sub> emissions of 7%, equal to c.4.5 tonnes of CO<sub>2</sub>/year (SAP10 carbon emission factors), beyond the compliant Part L 2013 baseline
- 19.31 Site-wide, the proposed low carbon energy servicing strategies (Be Green) predict a site wide reduction in regulated CO<sub>2</sub> emissions of 33%, equal to 120 tonnes of CO<sub>2</sub>/year (based on SAP10 carbon emission factors) beyond the compliant Part L 2013 base case based on SAP10 carbon emission factors.
- 19.32 The cumulative carbon savings of the above measures predict a reduction in regulated CO<sub>2</sub> emissions of 47% (equal to 137 tonnes of CO<sub>2</sub>/year) beyond the compliant Part LIA 2013 base case based on SAP10 carbon emission factors for the residential elements, a reduction in regulated CO<sub>2</sub> emissions

of 42% (equal to 1.5 tonnes of CO<sub>2</sub>/year) for the flexible commercial space, and a reduction in regulated CO<sub>2</sub> emissions of 46% (equal to 31 tonnes of CO<sub>2</sub>/year), for the college, beyond the compliant Part L2A 2013 base case based on SAP10 carbon emission factors. The combination of all the proposed measures predict a site-wide reduction in regulated CO<sub>2</sub> emissions of 47% (equal to 169 tonnes of CO<sub>2</sub>/year) beyond the compliant Part L 2013 base case based on SAP10 carbon emission factors.

- 19.33 As such, the proposed energy strategy demonstrates that the residential component of the development does not meet the London Plan's "zero carbon" requirement, and, in line with the revised Energy Strategy, the annual carbon shortfall of 152.74 tonnes of CO<sub>2</sub> is therefore proposed to be addressed through a cash-in-lieu contribution to the Council's Carbon Offset Fund which is equivalent to £435,304 based on £95 per tonne of carbon for 30 years.
- 19.34 The Flexible Commercial Space in Block A and College also do not meet the London Plan's "zero carbon" requirement, and therefore annual carbon shortfalls of 2.1 and 36 tonnes of CO<sub>2</sub> in relation to the flexible commercial space and the college respectively, have to be addressed through cash-in-lieu contributions to the Council's Carbon Offset Fund which are equivalent to £6,012 and £102,600 respectively based on £95 per tonne of carbon for 30 years.
- 19.35 Taking all of the above into consideration, the total annual carbon shortfall of 191 tonnes of CO<sub>2</sub> is proposed to be addressed through a cash-in-lieu contribution to the Council's Carbon Offset Fund which is equivalent to £543,916 based on £95 per tonne of carbon for 30 years.
- 19.36 Notwithstanding the carbon offset calculations set out above, the proposed carbon offsetting contribution for the flexible commercial unit is not accepted, and the applicant should investigate additional onsite measures to improve on the CO<sub>2</sub> emissions savings and percentage reduction to basically offset the carbon shortfall onsite and maximise the savings onsite, which could be investigated and secured by condition.
- 19.37 A number of additional passive design measures, other than those stated above, have been considered to reduce the risk of overheating in a selection of the residential units of different orientation, size and height above ground floor, whilst paying particular attention to units facing south, west and east including insulated equipment, pipework, good temperature controls and appropriate ventilation of distribution routes. In this regard, comfort cooling is not proposed for the dwellings.

- 19.38 The results of the overheating assessment showed that all habitable spaces and corridors pass CIBSE TM59 criteria under DSY1 weather file. In addition, 74% and 63% of the residential habitable spaces and corridors tested pass CIBSE TM59 criteria under the DSY2 (2003) and DSY3 (1976) weather files, respectively.
- 19.39 In line with the GLA's energy assessment guidance (2020), although it is acknowledged that the two extreme weather files, DSY2 and DSY3, are challenging to meet, compliance with the criteria should be maximised through demonstration that all passive measures have been explored, including reduced glazing, optimised glazing ratio, maximisation of the floor to ceiling height and increased external shading. Further, applicants should commit to develop and distribute a strategy to occupants to provide them guidance how to reduce the overheating risk in their home in line with the cooling hierarchy and cope with extreme weather events. This requirement will be conditioned.
- 19.40 The SAP Overheating modelling output reports provided demonstrate a slight or not-significant overheating risk for the residential units assessed. This demonstrates compliance with Criterion 3 of the Building Regulations.
- 19.41 A number of measures are proposed to reduce the risk of overheating in the non-residential spaces including the college and flexible commercial space in Block A. In particular for the College, measures include air handling units with incorporated peak temperature lopping and exposed soffits with heavy thermal mass to control internal temperatures and external solar shading. Three worst case teaching rooms were assessed for overheating against the CIBSE TM52 criteria. The results demonstrated that all spaces tested pass the criteria. High density ICT rooms and Catering facilities will require additional cooling to mitigate the risk and offset large internal gains.
- 19.42 The area weighted average (MJ/m<sup>2</sup>) and total (MJ/year) cooling demand for the actual and notional building for the non-residential spaces including Flexible Space in Block A and College has been provided. Whilst in the previous energy report the actual building's cooling demand for the flexible space was lower than the notional, the revised report shows an increase of 12%, although it is recognised that this is a result of the increased levels of insulation, however it is considered that further measures should be identified to reduce the actual cooling demand.
- 19.43 In line with the revised energy report, the College's cooling demand has been demonstrated to be 27% higher compared to the notional. Although this increase in the cooling demand is outweighed by the savings in space heating demand as stated in the revised energy report, it should be reduced as much

as its practicable prior to active cooling being proposed. If meeting the notional cooling demand is not possible, the applicant should provide a clear explanation of why it is not possible and outline the implications for building design, and this would be addressed through the submission of details post-approval.

- 19.44 With regards to the sustainability measures proposed, the development proposes to incorporate environmentally friendly and responsibly sourced materials in line with the BES 6001 Responsible Sourcing of Construction Products guidance. With regards to the non-residential spaces of the development, BREEAM pre-assessments have been carried out for the flexible commercial space and college using BREEAM 2018 New Construction. In line with the reports, the College proposes to achieve BREEAM Outstanding or 88.46% ( $\geq 85\%$ ) and Flexible Space to achieve BREEAM Excellent or 72.51% ( $\geq 70$ ), and as such, the proposed targets are in line with Policy DH1 of the Local Plan (2014).
- 19.45 A Preliminary Ecological Appraisal (PEA) and Extended Phase I Habitat Survey have been carried out for the land at 95 Plumstead Road to assess the baseline ecological conditions of the site and its potential to support protected species and species of conservation concern.
- 19.46 With regards to the PEA, the report demonstrates that the site consists mainly of buildings, hardstanding with scattered areas of amenity grassland, smaller areas of introduced shrub and hedgerows and scattered trees. The site has been found to be of low ecological value.
- 19.47 The site is not subject to any statutory nature conservation designations and no statutory sites are present within 2km of the site. The Impact Risk Zone (IRZ) of Oxleas Woodlands LNR and SSSI, located 3km south of the site and sixteen non-statutory designated sites within 2km of the site with the closest being Plumstead Railway Cutting Site (SINC) located immediately south of the site and River Thames and Tidal Tributaries SMINC 700m north.
- 19.48 No evidence of badgers, great crested newts, reptiles, dormice, water voles and otters or suitable habitats to support these species have been identified during the site survey.
- 19.49 Evidence of invasive cotoneaster sp. was confirmed during site survey and measures should be taken to remove this plant from site following best practice guidance (DEFRA).
- 19.50 Although the site is considered to have low potential to support notable invertebrates, actions are proposed to enhance the value of the site including

bee bricks, habitat panels and stag beetle loggeries and log piles, sandy piles and rock piles.

- 19.51 The piles would be implemented on the proposed biodiverse roofs which will also utilise at least 30 species that are ideal for rockery type planting and have high biodiversity value including: sea thrift, great mullein, yarrow, lesser calamint, common primrose, mother-of-thyme, small scabious and bugle. The green roofs would have a typical substrate composed of recycled crushed brick, expanded clay shale and recycled organic content and be designed, installed and maintained in line with the GRO Green Roof Code.
- 19.52 Evidence of a range of bird species and suitable habitats such as scattered trees, hedgerow and scrub on site to support birds were recorded during the desk based study and site survey including house sparrow and starlings. Mitigation measures are proposed such as any tree and shrub clearance should be taken outside of the bird breeding season, two specialist house sparrow nest boxes and three generalist bird boxes.
- 19.53 The desk-based study identified five records of bat species including noctule, serotine, common/ soprano and nathusius pipistrelle within 2km of the site. All buildings and trees on-site are assessed as having low or negligible potential to support roosting bats. However, the Plumstead Railway Cutting SINC has potential to support commuting and foraging bats. The Bat Survey Report identified low levels of commuting and foraging activity on-site during the emergence survey but no emergence behaviour. Certain measures are proposed to minimise the impact on roosting bats such as biodiverse green roof, wildlife friendly landscaping, bat boxes and wildlife sensitive lighting. A single emergence/re-entry survey visit is also recommended due to the low potential of roosting features.
- 19.54 Evidence of moderate to good quality trees were identified on-site. A number of trees along the southern border and one tree on the northern border are proposed to be retained. Measures to protect these trees are proposed such as pruning for construction phase, root protection areas, to be secured by way of condition. Six trees are proposed to be removed but a new high-quality stock of trees is proposed. The Central Courtyard would also include multi-specimen trees and hedges, shrubs and ground covers including evergreen and broadleaved trees.
- 19.55 Based on the findings of the PEA, the demolition and construction works will not have an impact on the designated sites due to the location of the proposed site. Any clearance of habitats identified within the site to support protected/notable species will be compensated through soft landscaping

proposals including green roofs and planting schemes of recognised value to wildlife.

- 19.56 Other mitigation, enhancement and compensation measures are proposed including an ecologist's site visit to be undertaken prior to any works commencing to confirm the presence/absence of nest sites.
- 19.57 A management plan has been provided within Appendix 3 of the Biodiversity Enhancement and Management Plan which demonstrates the actions for the first five years after project completion. Whilst the management plan actions provided are generally fine, a more detailed landscape and ecological management plan including management responsibilities and long-term design objectives would be secured by way of condition. The measures in the Management Plan are supported, however the applicant should further explore the use of permeable paving on the courtyards and private terraces.
- 19.58 The proposed development would achieve an urban green factor of 0.3 which is below the target of 0.4 as set out in Policy G5 of the London Plan for mainly residential schemes. The challenges associated with achieving the target UGF score are noted, and the scheme would improve the biodiversity value of the site, and as such, a condition requiring at least a UGF score of 0.3 to be achieved, with measures explored to further increase this explored at the submission of details stage.
- 19.59 The applicant is committed, however, to including intensive and extensive green roofs, green walls, trees, an increase in permeable paving, hedges, amenity grassland and trees. Whilst the inclusion of the measures is welcomed, because the UGF is still falling short of the target, the applicant is advised to investigate species rich grassland to cover an increased area instead of amenity grassland.

## **20. Legal Agreement**

- 20.1 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. In addition, the Planning Obligations (s106) Guidance SPD (2015) sets out a range of obligations which the local planning authority normally seeks contributions for, including calculations where relevant, to determine the scale of contribution (e.g. Cycle Training, GLLaB, Car Club).

20.2 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

- The provision of 50.4% (by unit) overall affordable housing provision (148 units), comprising of 72 units (24.5%) as London Affordable Rent and 76 units (25.9%) as Intermediate Housing (Shared Ownership).
- Affordable housing unit mix to be provided as set out in the following table:

| Tenure                                       | Studio | 1-bed | 2-bed | 3-bed | Total |
|--|--------|-------|-------|-------|-------|
| London Affordable Rent                       | 0      | 20    | 32    | 20    | 72    |
| Intermediate (Shared Ownership)              | 0      | 29    | 35    | 12    | 76    |
| Total Affordable Housing (by unit)           |        |       |       |       | 148   |
| Total Affordable Housing (by habitable room) |        |       |       |       | 822   |

- All affordable units to be occupied before occupation of all private sale units.
- Early-stage review in accordance with Mayor's Viability SPG (August 2017) and the Review mechanisms Procedure Practice Note April 2019.

*London Affordable Rent (Specific)*

- London Affordable Rented units will be at (or no more than) the GLA benchmark rent levels and these are updated by the GLA on an annual basis in accordance with the Mayor's Funding Guidance.
- Submission of a Lettings Plan.

*Shared Ownership (Specific)*

- Shared Ownership Eligibility criteria targets applicants who meet the lower RBG income band of £71,000 for 1 and 2 bed properties and £88,000 for 3 bed properties for the first 3 months of marketing, after this period the dwelling can be marketed at GLA income thresholds London-wide.
- Agreement protocol for the Council to advertise to individuals living and / or working in the Borough in the first instance, with units to be

marketed for sale exclusively to Eligible Purchasers who are Local Residents within the initial marketing period.

- Submission of an Accessible Marketing Plan for the adaptable units.
  - Submission of Intermediate Housing Sales and Marketing Plan.
  - Submission of an agreement to establish a method to provide annual verification details to the council's housing department.
  - To keep service charges for tenants to a fair and reasonable level.
- Transport
    - Amendments to the Traffic Order Controlling Plumstead Station CPZ to extend its coverage to include the site, and consult on increasing the number of hours it is active (£3,500), and to fund any additional enforcement required, sum to determined in consultation with the applicant and members updated accordingly.
    - Residents and other occupiers of the development (except Blue Badge holders) to be exempt from acquiring CPZ permits including amendments to Traffic Orders as required.
    - £5,880 towards the provision of adult cycle training programme.
    - Car-Club membership (cost of membership x 5 years x No. of units).
    - Enter into a s278 and/or s38 for relevant highways works to Invermore Place, Villas Road and Plumstead Road to facilitate re-development.
    - To commit to street level upgrades on Invermore Place and Villas Road, including new street lighting.
    - Financial contribution towards the implementation of Cycleway 4, sum to determined in consultation with the applicant and members updated accordingly.
  - Education and Employment Training
    - Commitment to utilise Greenwich Local Labour and Business (GLLaB) during the construction phases.
    - Contribution towards GLLaB of £294,000 (to be index linked in line with the RPI index).
  - Energy and Carbon Offsetting
    - Financial contribution to the Local Authority to account for emissions from the development to be calculated at a rate of £95/tonne as required.
    - Designated space for the future provision of the necessary equipment and incoming mains connections for connection to a District Heating Network (DHN), in the event that an appropriate DHN comes online within the lifetime of the development, including a safeguarded provision to the edge of the site for both residential



and college components to be coordinated with other external utilities/services.

- The development will be designed to enable post construction (Be Seen) monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages.
  - A monitoring agreement that will be signed between the Local Authority and the applicant to monitor the effectiveness of the renewable energy technology, to 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 and provision of monitoring data to the Council's Sustainability Team for a minimum period of 5 years.
- Play Space
    - Financial contribution toward off-site play space for children of 12+ years within the vicinity of the site, sum to determined in consultation with the applicant and members updated accordingly.
  - College Use
    - Community Use Agreement for the College enabling the new college facilities to be used by the wider community at certain times, in accordance with Policy S3 of the London Plan.
  - Other Obligations
    - Retention of an architect for the lifetime of the development until completion.
    - Payment of legal costs associated with the drafting, signing and completion of the s106.
    - Payment of a financial contribution toward s106 monitoring costs.

20.3 It should be noted that where obligations take the form of financial contributions, and the contribution has been calculated from a formula within the Planning Obligations SPD, the rate for such contributions will be set at the time of the application. The rates set out in the Planning Obligations SPD apply from April 2015 and are subject to indexation in line with the RPI from the date of adoption of the SPD.

## **21. Public Sector Equality Duty (PSED) and Human Rights**

21.1 Under the Equalities Act 2010, the council must have due regard to the need to eliminate discrimination, harassment or victimisation of persons by reason of age, disability, pregnancy, race, religion, sex and sexual orientation. This

planning application has been processed and assessed with due regard to the PSED. The application proposals are not considered to conflict with the Duty.

- 21.2 The application has also been considered in the light of the Human Rights Act 1998 and it is considered that the analysis of the issues in this case, as set out in this report and recommendation below, is compatible with the Act.

## **22. Conclusion and Planning Balance**

- 22.1 The proposed development is considered to be acceptable in principle, making efficient use of surplus land on a brownfield site to deliver a significant number of homes, with a very good level of affordable housing (50.4% by unit), comprising of 72 units (24.5%) as London Affordable Rent and 76 units (25.9%) as Shared/Ownership units. It is further recognised that in redeveloping the college with a smaller floorspace, the campus would be able to function at increased capacity, in part because the college would be design for its purpose, and in part because large parts of the existing campus are unsuitable or unusable.
- 22.2 The overall design quality of the proposal is considered to be acceptable, and whilst it is recognised that the proposal would introduce tall buildings into a site which falls partly within, and partly outside the designated tall building zone, due to the high quality design, the variation in height and the sympathetic materials proposed, it is considered that the proposal would have a beneficial impact on the surrounding area in townscape terms.
- 22.3 The functional and environmental impacts of the tall building have been considered, in accordance with Policy D9 of the London Plan, and it is considered that the proposal, subject to mitigation would not result in significant adverse impacts on surrounding residential properties or the public realm. Moreover, noting the existing and proposed uses, it is considered that whilst activity on-site is likely to significantly increase, this would not give rise to any significant adverse impacts on noise or air quality.
- 22.4 The residential element of the proposal would be car-free, except for blue badge holders for which 9 car parking spaces would be provided on-site, within the new east-west road, and on Invermore Place. Noting the very high PTAL, this is considered acceptable. 12 spaces are proposed for use by the college, comprising of 10 standard car parking spaces on New Street, a dedicated inset parallel bay for larger vehicles (e.g. minibus) and one blue badge space on Invermore Place (noting that the spaces on Invermore Place could be used by any blue-badge holder at any time). This represents a significant reduction in the number of on-site parking provision, and whilst the comments from TfL are noted, it is considered that this represents an

appropriate level of provision which would not hinder or prohibit the college from functioning whilst also discouraging excessive car use when it is not required.

- 22.5 The overall quality of accommodation is considered to be good, and whilst access to light within some properties in Block A1 would be constrained, this would not lead to unacceptable living conditions, noting that each unit would be provided with a balcony which would receive significantly above the minimum daylight requirements. Across the remainder of the site, access to daylight and sunlight is generally high, with a large communal courtyard provided centrally which would provide a welcoming environment and a sense of retreat for future users.
- 22.6 Overall, the proposal is considered to represent an efficient use of a brownfield site in a sustainable location, and on this basis, the proposal is recommended for approval.

### **Background Papers:**

The London Plan (2021), Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), Planning Obligations (s106) Guidance SPD (2015), The National Planning Policy Framework (NPPF) (2019), The National Planning Practice Guidance (NPPG), The Human Rights Act (1998), The Equalities Act (2010), Affordable Housing and Viability SPG (2017), Housing SPG (2016).

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