

<b>PLANNING BOARD</b>	<b>Agenda Item: 4</b>
<b>4 May 2021</b>	<b>Reference No: 19/2498/F</b>

**Applicant: Legal & General Property Limited (C/O agent)**  
**Agent: Quod (Ben Ford)**

<b>Site Address:</b> Land bound by Beresford Street and Macbean Street, Woolwich, SE18 6BG	<b>Ward:</b> Woolwich Riverside  <b>Application Type:</b> Full Planning Permission
---	--

## **I. Recommendation**

### **I.1 To grant planning permission for the following development:**

Residential led, mixed-use development comprising residential dwellings (Use Class C3) with ancillary residential facilities and flexible floorspace Use Classes E, F1, F2 and sui generis (market pound, public house, drinking establishment, hot food takeaway) [formerly Use Class A1-A5, B1, D1, D2 and sui generis (market pound)], new public realm with hard and soft landscaping, highway works, disabled car parking and cycle parking, access and servicing arrangements, mechanical plant 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) Members confirming in their decision that account has been taken of environmental information, as required by Regulation 26 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017;**
- (iii) A statement being placed on the statutory Register confirming the main reasons and consideration of which the Planning Board decision was based as required by Regulations 30 (l) (d) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017;**

- (iv) 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), any addendums, and the minutes of this Planning Board meeting;
- (v) Conditions set out in Appendix 2;
- (vi) To authorise the Assistant Director of Planning & Building Control to:
  - (a) make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2), its addendums and the minutes of this Planning Board meeting, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice; and
  - (b) finalise the detailed terms of the planning obligations pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), as set out in this report, its addendums and the minutes of this Planning Board meeting.
- (vii) In the event that the Section 106 Agreement is not completed within three (3) months of the date of this Planning Board meeting, to authorise the Assistant Director of Planning & Building Control to consider whether permission should be refused on the grounds that the proposals are unacceptable in the absence of the benefits which would have been secured, and if so, to determine the application with reasons for refusal which will include the following:

In the absence of a legal agreement to secure financial and non-financial contributions including for affordable housing, education infrastructure, health infrastructure, transport and highway works, public transport enhancements, public realm improvements, car club contributions, the provision of the market pound area for street traders at a peppercorn rate, employment and training, and environmental sustainability, the development would be contrary to policies H3, H5, H(e), EA4, EA(c), EI, CH(a), 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 proposed development is a residential-led, mixed use development proposing 595 flats and approximately 2000 m<sup>2</sup> of commercial floorspace at ground and first floor level, predominantly comprising a mix of retail office uses. The proposal includes three tall elements, reaching up to 22 storeys, arranged around a central courtyard with a nine-storey podium facing Beresford Street and Macbean Street.
- 2.2 The proposal includes 20% affordable housing by unit (24.4% by habitable room), proposed at an intermediate tenure, and therefore has been tested through the viability route to determine the maximum reasonable amount of affordable housing can be provided. Owing to the very poor viability of the scheme, which demonstrates that a 0% affordable housing offer would reach a break-even position, this is considered to be the maximum amount which can be secured.
- 2.3 The proposal would be car free, with parking restricted to disabled persons parking and space for deliveries and servicing, with cycle parking provision in excess of the minimum number required.
- 2.4 The application has been amended a number of times, and following the most recent amendments in November 2020, the quality of accommodation site wide is considered to be acceptable, however it is noted that access to light for some properties, especially in Block C, would be limited. In addition, by reason of its size and having regard to the relatively open aspect of the existing site, it is recognised that there would be some loss of light to neighbouring buildings, however significant loss of light is mostly restricted to non-residential buildings.
- 2.5 Consultation on the proposal has led to objections from Historic England and the council's Conservation Officer, who advised that there is harm, albeit less than substantial harm, to nearby heritage assets including the Royal Arsenal Conservation Area, the Grade I listed Royal Brass Foundry and the Grade II listed Equitable House as a result of the height of the proposal. As such, national policy advises that this harm must be weighed against the benefits of the scheme. The design of the proposal is considered to respond relatively well to the surrounding context, and notwithstanding the height and ram to heritage assets, is broadly supported in terms of its layout, detailed design and quality of materials.
- 2.6 In this instance, the proposal as a whole is considered to deliver sustainable development objectives, including supporting the supply of new houses, an improved affordable house offer (compared to the viability position which

demonstrates 0% affordable housing at a break-even position for the applicant, and the financial contributions towards health, transport, education and employment infrastructure, in addition to supporting and safeguarding the continued functioning of the Woolwich Street Traders, whose storage would be leased to the council at a peppercorn rate. As such, on balance, and whilst less than substantial harm has been identified, the proposed development is recommended for approval on the basis that the benefits of the proposal outweigh this harm in this instance.

### 3. **Summary**

3.1 Detailed below is a summary of the application:

<b>The Site</b>	
Site Area (m <sup>2</sup> )	1.175ha
Local Plan Allocation (adopted 2014)	Mu9 – Macbean Centre and former Woolwich Polytechnic
Draft Local Plan – Site Allocation Proposed Submission (published for consultation February 2021)	W4 - Vacant Lot on Macbean Street, Market Pound, 1-4 Beresford Street and 1-3 Beresford Square
Heritage Assets	<p>Part of the site is within the Woolwich Conservation Area (adopted 2019).</p> <p>There are numerous nearby heritage assets located within the vicinity of the site. These include the grade I listed Royal Brass Foundry along with grade II* and grade II listed buildings, and locally listed buildings within the Woolwich Conservation Area and the nearby Royal Arsenal Conservation Area (within 50 metres of the site).</p>
Tree Preservation Order	No
Flood Risk Zone	Zone 1

<b>Proposed Building</b>	
<b>Building heights</b>	
Block A	9 – 19 storeys Total height: 62.4m
Block B	10 – 22 storeys Total height: 71.6m

Block C	9 – 16 storeys Total height: 52.6m
Block D	7 – 10 storeys Total height: 33.5m
Block E	3 – 7 storeys Total height: 23.4m
Floor area (m <sup>2</sup> )	55,748m <sup>2</sup> (GIA)

<b>Housing</b>		
Housing provision	No. of dwellings	595
	No. of habitable rooms	1,298
Density	Dwellings per Hectare (u/ha)	506 u/ha
	Habitable Rooms per Hectare (HRH)	1,105 HRH
Dwelling Mix <i>number (%)</i>	Studio (1-bed / 1-person)	164 (27.6%)
	1-bed / 2-person	199 (33.4%)
	2-bed / 3-person	68 (11.4%)
	2-bed / 4-person	134 (22.5%)
	3-bed / 5-person	8 (1.3%)
	3-bed / 6-person	12 (2.0%)
	4-bed / 6-person	10 (1.7%)
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes
Affordable Housing by habitable rooms <i>number (%)</i>	Overall Affordable Housing	317 HR (24.4%)
	Private Rent	981 HR (75.6%)
Affordable Housing / Tenure Split by unit <i>number (%)</i>	Overall Affordable Housing	119 (20%)
	London Living Rent	36 (6%)
	Discount Market Rent (Intermediate)	83 (14%)
	Private Rent	476 (80%)

<b>Non-Residential Uses</b>		
Existing Use(s) (GIA)	Existing use (Classes) / Operator	DI and Sui Generis
	Storage for Beresford Square market traders and vacant land	Total Floor area = 3,010 (m <sup>2</sup> )  Market Pound = 183 (m <sup>2</sup> )

Proposed Use(s) (GIA)	Proposed use(s) (Classes) / Operator	2,022 Floor Area (m <sup>2</sup> )/Class E, BI, FI, F2 and Sui Generis
	Residential (C3) including resident facilities and gym Flexible Commercial (A1-A5/BI/D1/D2)	48,980 m <sup>2</sup>  2,022m <sup>2</sup>
	Market Pound (Sui Generis)	676m <sup>2</sup>
Employment	Existing Number of jobs	0
	Proposed number of jobs on site	103 FTE

<b>Transportation</b>		
Car Parking	No. existing car parking spaces	N/A
	No. Proposed Car Parking Spaces	18 spaces (all blue-badge wheelchair spaces) 1 blue badge car space and 3 van parking spaces for commercial use
	Proposed Parking Ratio	3.2% of dwellings
Cycle Parking	No. Proposed Cycle Parking	Residential: 942 Commercial: 32 Total: 974 Visitor (short-stay): 22
	Complies with policy	Yes – car parking ratio higher than London Plan standard
Public Transport	PTAL Rating	6a - 6b

<b>Sustainability / Energy</b>	
BREEAM Rating	Excellent
Carbon Emission Reduction (%)	57.2%

<b>Public Comments</b>	
Number of Representations	17
Number of Objections	16
Number in Support	1
Material Considerations Raised:	<ul style="list-style-type: none"> <li>Loss of existing buildings is not warranted.</li> </ul>

	<ul style="list-style-type: none"> <li>• Adverse impact on the setting of key historic buildings within the Royal Arsenal Conservation Area.</li> <li>• A density of 556 u/ha (by number and based on a plot size) is too dense</li> <li>• Low number of larger homes (3 and 4-bedroom flats) does not support community cohesion.</li> <li>• Affordable housing is too low and is not actually affordable.</li> <li>• Social housing should be included.</li> <li>• Transport infrastructure is insufficient.</li> <li>• Design is poor quality, uninspiring, bland, monolithic and massing is overbearing.</li> <li>• Tower blocks in built up spaces reduce light and encourage depression.</li> <li>• Insufficient community consultation has been carried out.</li> <li>• Proposal is too tall and too dense and will impact local services.</li> <li>• Welcome the development of this largely abandoned site which is an eyesore in Woolwich.</li> <li>• Retail units are not supported and will lie empty.</li> <li>• Supports the build to rent model of housing.</li> <li>• Cycle and pedestrian improvements should be secured through CIL and/or a S106 agreement.</li> <li>• Building materials should be recycled.</li> <li>• Overshadowing to neighbouring public spaces.</li> <li>• A reduction in height would help to protect the vistas and views, and the Townscape Character of the town centre and Townscape Character of the Royal Arsenal.</li> <li>• More tree planting is needed.</li> <li>• Sustainability both socially and environmental is lacking in the proposal.</li> </ul>
--	--

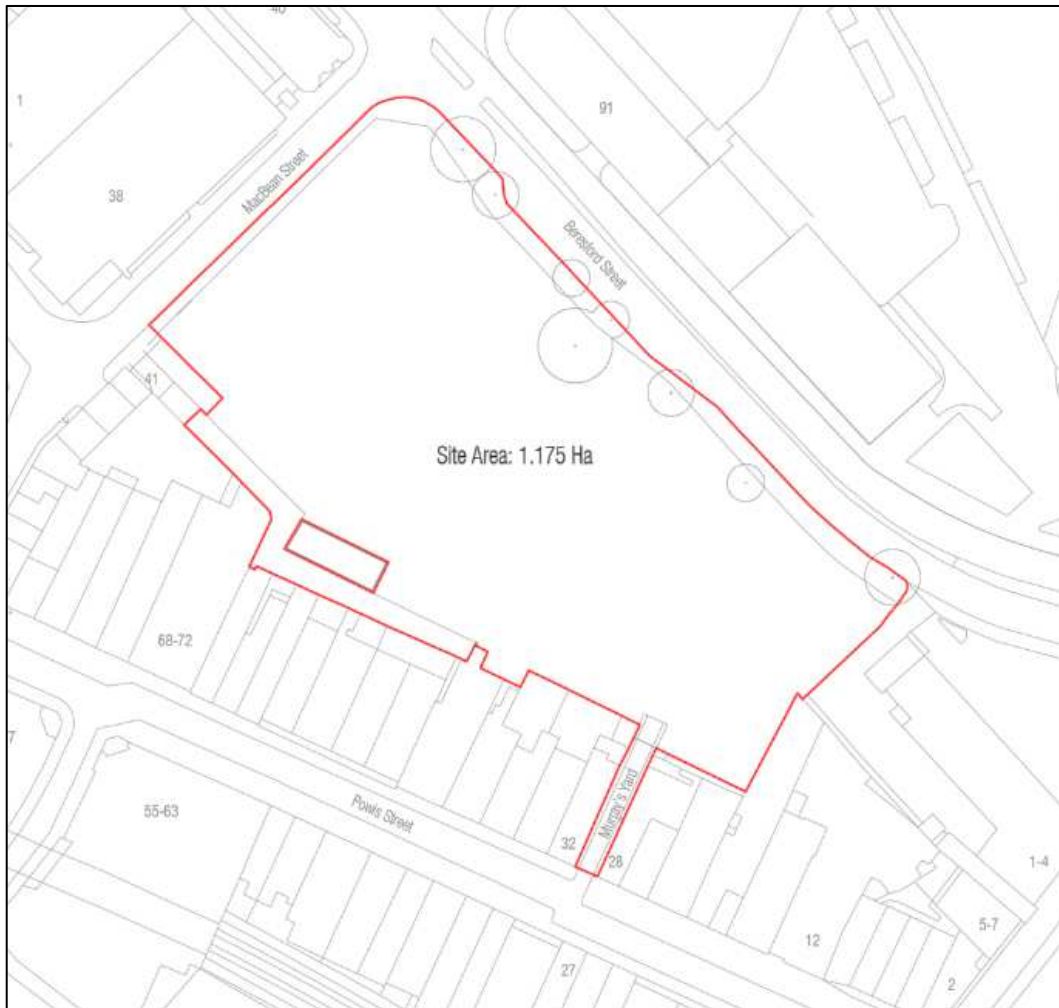
	<ul style="list-style-type: none"> <li>• These blocks would exacerbate the "wind tunnel" effect already experienced in this area.</li> <li>• The proposal should sensitively connect the towers nearer the river with the low-rise development of Woolwich town centre through a development of intermediate height, which this does not do.</li> <li>• The developer should make provision for a GP surgery at ground level.</li> <li>• Loss of daylight, sunlight and privacy to adjoining properties.</li> <li>• Prejudice future development proposals within the town centre.</li> <li>• Proposal does not support connectivity.</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 site comprises an area of land within Woolwich Town Centre, located on the southern side of the junction of Macbean Street and Beresford Street with frontages to both of these roads. The site also includes the existing Market Pound, which is accessed from Beresford Street and provides a storage area for the market traders in Beresford Square.
- 4.2 The site also comprises Murray's Yard, which is a lane that runs east-west from Macbean Street to Powis Street along the rear boundary of the properties situated to the north of Powis Street. Murray's Yard is largely fenced off private land with the exception of a short extent of the laneway where it joins Powis Street. The site boundary excludes a structure within the larger site area that is located close to the southern boundary of the site.

- 4.3 The site is largely vacant of buildings and comprises mostly open hardstanding with the exception of the 4-storey former Electricity Department building that dates back to the 1930s and other disused 1 to 2-storey buildings surrounding a former servicing yard. The property that is excluded from the site boundary is a single-storey building of light industrial appearance, which benefits from a right of access covenant across part of the site and Murray's Yard.
- 4.4 The site is flat and generally void of vegetation save for a few trees and shrubs that have been left to grow unattended; although there is no Tree Protection Order covering the site. The site is located within flood zone 1 and benefits from flood defences along the boundary of the River Thames. TfL's PTAL maps indicate that the site contains a PTAL ranging from 6a to 6b, which is the highest, and this is due to the proximity of Woolwich Arsenal DLR Station, Woolwich Train Station and numerous bus routes which head east, west and south.
- 4.5 The adjoining properties on Macbean Street comprise 2-3 storey buildings that form a terrace, which increases in height towards Powis Street. Most of these properties contain ground floor commercial units with office or residential units above. However, two properties contain gated access ways to a servicing area at the rear. Adjoining the site to the south are the properties that front onto Powis St, which forms one of the main retail frontages in the Woolwich Town Centre and comprises 3 to 4 storey buildings. The property adjoining to the east is a 3-storey post-war commercial building that fronts onto Beresford Square and Beresford Street.
- 4.6 Opposite the site to the west across Macbean Street is a large single storey retail building occupied by Lidl, and Royal Sovereign House, which is a 5-storey office building with frontage to Beresford Street. To the north of the site across Beresford Street is the Royal Arsenal Hotel, which is a recently completed 6-storey building, and the former Catholic Club site, which is currently unoccupied.
- 4.7 The site is identified to be within site allocation W4 (Vacant Lot on Macbean Street, Market Pound, 1-4 Beresford Street and 1-3 Beresford Square) under the Draft Local Plan – Site Allocation Proposed Submission (published for consultation February 2021), which also includes the adjoining commercial property to the east of the site. The site also lies within the area identified as being appropriate for tall buildings in the adopted Local Plan. Woolwich is also identified as an Opportunity Area and Strategic Area for Regeneration within the London Plan (2021).

4.8 The site does not contain any statutorily or locally listed buildings, however, there are two new additions to the local list that adjoin the site on Macbean Street and the properties surrounding Murray's Yard on the northern side of Powis Street. The recently adopted Woolwich Conservation Area boundary includes three buildings within its boundaries that are included in the proposal site. The majority of the development site falls within the 'commercial periphery' zone which is characterised by its lack of heritage assets. The Macbean Centre is included within the boundary because of its historical association with (and physical attachment to) the former Electric House electricity showroom on Powis St (44-48). The Survey of London confirms this was the rear offices/stores for the showroom and has high quality internal finishes. The Royal Arsenal Conservation Area is located to the north-east on the opposite side of Beresford Street to the existing market pound.

## **5. Relevant Planning History**

### **5.1 Development Site at Former Woolwich Polytechnic School, Macbean Street**

- 5.1.1 94/0974 – Replacement of music room. Approved – 03/08/1994
- 5.1.2 87/0280/P – Erection of a new boundary fence. Approved – 06/05/1987.
- 5.1.3 13/0345/F – Creation of a temporary car park (Retrospective). Refused – 17/04/2013.
- 5.1.4 14/1762/F – Retrospective use of land as a hand car wash service with associated facility. Refused – 19/08/2014.

### **5.2 Land at former 38 Macbean Street**

- 5.2.1 94/0861 - Temporary accommodation for laundry collection and distribution depot. Approved - 01.09.94
- 5.2.2 98/1804 - Renewal of permission dated 1.9.94 (Ref: 94/0861) for temporary accommodation for laundry collection and distribution depot.

### **5.3 Building C, Murray's Yard off Powis Street, SE18**

- 5.3.1 82/0365 - Use of Building 'C' for retail purposes. Approved – 17/08/1982
- 5.3.2 90/0076/P - Use of premises for retail purposes – 28/03/1990

5.3.3 90/0986/F - Re-Roofing and cladding existing single storey building and provision of a new mezzanine floor and retail shop. Approved – 03/04/1991

5.3.4 91/1174P - Re-roofing & cladding single storey building & provision of a new mezzanine floor & retail shop. Approved – 31/12/1991

#### 5.4 **Building D, Murray's Yard Powis Street, SE18**

5.4.1 92/0932/P - Use for retail purposes with ancillary office and store. Approved – 18/11/1992

#### 5.5 **Building E, Macbean Centre Macbean Street Woolwich SE18**

5.5.1 93/1500 - Change of use of 2nd floor from Class B1 to religious use and associated community use. Approved – 02/02/1994

#### 5.6 **Building F Macbean Centre Macbean Street Woolwich SE18 6LW**

5.6.1 93/1307 – Alteration of existing building to form two separate units to be used for B1 and/or B8 and demolition of unused existing outside toilet block to provide extra parking accommodation. Approved – 23/03/1994

#### 5.7 **Market Storage Area Beresford Street Woolwich SE18**

5.7.1 01/1484 - 1-48 sheet monopole advertisement display unit 'Backlit' or 'trionic' type. Approved - 22/08/2001.

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

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

“Residential led, mixed-use development comprising residential dwellings (Use Class C3) with ancillary residential facilities and flexible floorspace Use Classes E, F1, F2 and sui generis (market pound, public house, drinking establishment, hot food takeaway) [formerly Use Class A1-A5, B1, D1, D2 and sui generis (market pound)], new public realm with hard and soft landscaping, highway works, disabled car parking and cycle parking, access and servicing arrangements, mechanical plant and associated works.”

6.2 The proposal first seeks to remove all remaining structures on the site. The proposal would replace this with a comprehensive mixed-use development consisting of five blocks, labelled Block A to Block E, as well as a podium element connecting Blocks A to C along Beresford Street from Macbean

Street to Murray's Yard. The proposed maximum heights for each block are 19-storeys for Block A, 22-storeys for Block B, 16-storeys for Block C, 10-storeys for Block D and 7-storeys for Block E. The proposed podium element along Beresford Street is 9 – 11 storeys in height, whilst a lower podium between Blocks A and B is 2 storeys in height.

- 6.3 The proposed buildings are stepped and contain landscaped roof terraces above the 10-storey roof of Block B and the 7-storey roof of Block D. The roof of the podium fronting Beresford Street would also contain a landscaped roof terrace. These terraces would serve the residents of the development as private communal open space and include elements of play space for young children. The lower podium between Blocks A and B is proposed to contain a swimming pool that would be available to all residents of the development and contributes towards the play space for older children.
- 6.4 The proposal includes two publicly-accessible open spaces: Murray's Grove and Murray's Garden; as well as a new pedestrian and servicing route leading from Macbean Street to Murray's Yard, labelled Murray's Lane, which extends through to provide pedestrian and cycling access to Powis Street at the eastern end of the site. These areas of public realm would consist of areas of planting and seating, which include opportunities for play space, and the ground surface covering would consist of textured stone paving.
- 6.5 The proposal provides a series of commercial spaces at ground level throughout the development within all blocks with some limited additional space at the first floor in Blocks A and C. These spaces, which total an area of 2,022 m<sup>2</sup> are proposed as flexible commercial spaces covering a range of uses including Use Classes A1-A5, B1, D1, and D2. An enclosed Market Storage Centre is also proposed at the ground level of Block D fronting Beresford Street to replace the existing market pound that currently occupies a similar location on site. This facility would provide 676 m<sup>2</sup> of storage for the market traders that operate on Beresford Square.
- 6.6 It is proposed that the residential element of the development would be brought forward as Build-to-Rent units, which are purpose built rental units that would be held under single ownership by Legal and General (L&G). L&G would be responsible for letting, managing and maintaining the units and their associated areas in the development. The application also proposes 20% affordable housing (by unit) to be provided as Discounted Market Rent, with 30% to be set at London Living Rent levels and 70% to be set at a range of discounts in accordance with a letting agreement to be agreed and secured through a s106 agreement.

- 6.7 The proposal includes 595 residential dwellings, comprised of 164 studio (one-bedroom / one-person) units (27.6%), 199 one-bedroom / two-person units (33.4%), 68 two-bedroom / three-person units (11.4%), 134 two-bedroom / four-person units (22.5%), 8 three-bedroom / five-person units (1.3%), 12 three-bedroom / six-person units (2.0%), and 10 four-bedroom / six-person units (1.8%). Proposed Block A would contain 170 units, Block B would contain 188 units, Block C would contain 124 units, Block D would contain 73 units and Block E would contain 40 units.
- 6.8 Each proposed block would have its own access core providing secure access from the ground level to the public realm areas with post boxes provided in each respective lobby. The main lobby for all residents would be located at the ground floor of Block B, which includes a reception and parcel pick-up area. A gym is provided at the ground floor of Block E for the residents of this Block, whilst another gym is provided in the first floor of Block A. The remainder of the first floor of the podium linking Blocks A to C is dedicated as internal residential amenity space, which includes work benches and booths, and lounge, games and seating areas. Two bookable amenity suites are also provided for use by the residents at the first floor of Block C.
- 6.9 The roof of the 2-storey podium between Blocks A and B is proposed to contain an outdoor swimming pool with changing facilities and an internal lounge area that faces onto the swimming pool terrace. This facility is accessed by the residents of the other blocks through the access core in Block B.
- 6.10 The proposed new buildings are of a contemporary design that provides each block with its own character and appearance, which reflects its position and role within the development. The materials used largely features brickwork of varying colour and texture to give each building its own identity with colours and tones that reflect the historic context of the site. The lower elevations also feature glazed brick finishes, terracotta with glazed and matte finishes, and pre-cast concrete. Accents, detailing and the roof level elements consist of profiled metal cladding with varying colour and finish.
- 6.11 The proposal seeks to use the existing access to the site from Macbean Street to provide a shared access route running through the site (labelled Murray's Lane) with parking, delivery, servicing and manoeuvring areas. A second access point will be created on Macbean Street to serve a covered vehicle parking area at the ground level of Block A. The proposal includes a total of 22 vehicle parking spaces within the covered parking and open parking areas, which are all dedicated as wheelchair spaces and operational van spaces.

- 6.12 Cycle parking for residents in Blocks A to D is located at the first floor of the podium between Blocks A and B and is accessed via lifts from Macbean Street and Murray's Lane as well as internal lifts from the access cores. Cycle parking for Block E is provided in the ground level of this block. Visitor cycle parking spaces are provided in the public realm areas on Beresford Street, Murray's Garden and Murray's Yard. Refuse and recycling storage areas are provided at the ground level of each block with the main storage area at the ground level of Block B, which would be serviced from Murray's Lane.
- 6.13 The details in the Sustainability Strategy within the Revised Design and Access Statement indicate that the proposed development would achieve a 57.2% reduction in CO2 emissions compared with the Part L 2013 baseline. This includes a 12.8% reduction from passive design measures and energy efficiency measures, and an additional 44.3% reduction from the use of air source heat pumps (ASHPs). The remaining emissions will be offset through a cash-in-lieu contribution. The proposed commercial spaces are expected to achieve a BREEAM 'excellent' rating. All dwellings will be expected to target a maximum internal daily water consumption of 105 litres / person / day. In addition to the planting within the landscaped public realm areas and roof terraces, green roofs are proposed on the extensive flat roofs of all blocks, with the exception of Block A due to the extent of services located on the roof.

## **7. Consultation**

- 7.1 The application since being registered in August 2019 has been publicly consulted, comprising of a press notice, 3 x site notices and one hundred and seventy-three (173) individual letters, sent to individual occupiers in the vicinity of the application site. This also included consultation with statutory bodies and local amenity groups.
- 7.2 A second and third full round of consultation were carried out in June 2020 and April 2021 to notify the public of revisions to the proposed development (May 2020 and November 2021 amendments respectively). These comprised of a press notice, 3 x site notices and one hundred and seventy-three (173) individual letters, sent to individual occupiers in the vicinity of the application site. This also included consultation with statutory bodies and local amenity groups.
- 7.3 **Statutory Consultees**  
A summary of the consultation responses received along with the officer comments are set out in table below:

<b>Details of representation</b>	<b>Summary of Comments</b>	<b>Officers comments</b>
<b>City Airport</b>	<ul style="list-style-type: none"> <li>No objection subject to conditions</li> </ul>	See recommended conditions (Appendix 2).
<b>Environment Agency</b>	<ul style="list-style-type: none"> <li>No objection subject to conditions to address the risk of pollution to groundwater.</li> </ul>	See recommended conditions (Appendix 2).
<b>Historic England</b>	<ul style="list-style-type: none"> <li>Identifies a visual impact on the setting of designated heritage assets, including the Woolwich, Woolwich Common, and Royal Arsenal Conservation Areas, and the Royal Brass Foundry (Grade I), and Royal Artillery Barracks (Grade II* listed). We identify harm to the significance of these assets arising from the visual impact of the development on their settings and recommend seeking a reduction in height of four storeys for each tower in order to avoid or mitigate harm.</li> </ul>	The appearance of the proposed development and its impact on heritage assets is discussed in section 14 of this report.
<b>Historic England (GLAAS)</b>	<ul style="list-style-type: none"> <li>No objection subject to a condition to secure appropriate archaeological investigations to protect any heritage assets of archaeological interest that may be found on the site.</li> </ul>	See recommended conditions (Appendix 2).
<b>London Fire Brigade</b>	<ul style="list-style-type: none"> <li>Requests that access for fire appliances under building regs and adequate water supply for firefighting be provided.</li> </ul>	See recommended conditions (Appendix 2).
<b>Met Police</b>	<ul style="list-style-type: none"> <li>No objection subject to a condition for 'Secure by Design' details.</li> </ul>	See recommended conditions (Appendix 2).
<b>Natural England</b>	<ul style="list-style-type: none"> <li>No objection.</li> </ul>	
<b>National Health Service</b>	<ul style="list-style-type: none"> <li>Raised concern that that the development will impact on</li> </ul>	Socio-economic effects of the development are



<b>(NHS) / Greenwich CCG</b>	<p>health care services, which are already over-capacity.</p> <ul style="list-style-type: none"> <li>Disagrees with the following statement from the original ES: “There are no predicted health impacts anticipated because of access to healthcare services or other infrastructure.”</li> </ul>	discussed in section 20 of this report.
<b>Sports England</b>	<ul style="list-style-type: none"> <li>No objection.</li> </ul>	No comments.
<b>Thames Water</b>	<ul style="list-style-type: none"> <li>No objection to waste related matters;</li> <li>Identified an inability of the existing water network infrastructure to accommodate the needs of the development; and requested a condition relating to the occupation of units and the infrastructure upgrade is imposed;</li> <li>Identified water mains running through the site and advised on construction matters;</li> <li>Identified underground water assets located within 15m from the site and requested an informative is included with permission, if granted.</li> </ul>	<p>A condition requiring full details at a later stage to show the infrastructure upgrade is recommended by officers on any grant of consent (Refer to Appendix 2).</p> <p>An informative on any grant of consent will be imposed in regards to the water mains running through the site or within 15metres of the site (refer to appendix 3 – informatives).</p>
<b>Transport for London (TfL)</b>	<ul style="list-style-type: none"> <li>Further information required regarding the Healthy Streets approach.</li> <li>Further information required within a revised Transport Assessment, including Active Travel Zone and Person Injury Accident data analysis, and updated trip generation data (including mode share).</li> <li>Clarification required of delivery and servicing, including for the market storage operation, and how reversing</li> </ul>	Transport, highways and access issues are discussed in section 17 of this report. See recommended conditions (Appendix 2).

	<p>vehicles retain pedestrian and cycling safety.</p> <ul style="list-style-type: none"> <li>• Clarification required of connection to cycling routes.</li> <li>• Improvements to the cycle storage provision required, including its design, access and provision for a variety of parking stands.</li> <li>• Clarification required of vehicle access and Parking Management Plan to demonstrate that the development is capable of meeting 10% on-site provision.</li> <li>• A full Delivery and Servicing Plan, Construction Logistics Plan, and Travel Plan to be secured by conditions.</li> </ul>	
<b>TFL – DLR &amp; Underground</b>	<ul style="list-style-type: none"> <li>• No objection.</li> </ul>	No comments.
<b>Greater London Authority – Stage I response: 6<sup>th</sup> Jan 2020</b>	<ul style="list-style-type: none"> <li>• London Plan policies on principle of development, employment; housing and affordable housing; urban design and heritage; transport; and climate change are relevant to this application. Whilst the residential-led redevelopment is supported in principle, the application does not comply with the London Plan and draft London Plan for the reasons set out below: <ul style="list-style-type: none"> <li>○ Principle of development: redevelopment comprising 642 Build to Rent units and 2,944 m<sup>2</sup>. of flexible commercial space and reprovision of market pound is strongly supported.</li> <li>○ Housing and affordable housing: 30% affordable housing by habitable room</li> </ul> </li> </ul>	<p>The application is referable to the Mayor of London under categories IA, IB and IC of the Mayor of London Order 2008.</p> <p>The principle of development is discussed in section 11 of this report.</p> <p>The provision of affordable housing is</p>

	<p>including 30% London Living Rent and 70% at a range of DMR rent is being scrutinised to ensure this is the maximum offer. Affordability details, DMR levels and rent levels are required.</p> <ul style="list-style-type: none"> <li>○ Urban design and heritage: Height, massing and layout approach supported. No harm caused to nearby heritage assets. Some residential quality matters to be addressed. Fire safety statement required.</li> <li>○ Transport: Update to the transport assessment required; new route to the Elizabeth line station should be created; trip generation needs reconsidering; cycle parking to be increased; some additional information required on vehicle access and car parking; freight plans and travel plan required.</li> <li>○ Climate change: both water and energy approach is generally supported, subject to the provision of additional information.</li> </ul>	<p>discussed in section 13 of this report.</p> <p>Urban design and heritage impact are discussed in section 14 of this report.</p> <p>Transport matters are discussed in section 17 of this report.</p> <p>Sustainable design matters are discussed in section 19 of this report.</p>
--	--	---

#### 7.4 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>
<b>Children's services</b>	The nearby nurseries are full and will not meet the demand generated by the development.	The socio-economic effects of the development are discussed in section 20 of this report, however following

		discussions with the council's place planning team, it was considered that a contribution towards primary school place provision would have greater benefits.
<b>Education</b>	The proposal is likely to impact on school places. There is also a need for sites for new schools.	The socio-economic effects of the development are discussed in section 20 of this report, however some cumulative harm has been identified, and a financial contribution of £250,000 has been agreed to mitigate this harm.
<b>Environmental Health (Air Quality)</b>	No objection, subject to the inclusion of a condition ensuring air quality is not significantly affected.	See recommended conditions (Appendix 2).
<b>Environmental Health (Noise)</b>	No objection, subject to the inclusion of conditions controlling noise transmission for both residential and non-residential elements of the proposal.	Environmental health impacts are discussed in section 15 of this report.  See recommended conditions (Appendix 2).
<b>Environmental Health (Contaminated land)</b>	No objection, subject to conditions controlling contaminated land surveys and remediation.	See recommended conditions (Appendix 2).
<b>Flood Risk</b>	No objection subject to further details of the maintenance plan and exploration of using infiltration around the site.	See recommended conditions (Appendix 2).

<p><b>Highways</b></p>	<p>No objection to the proposal and owing to the site's PTAL a car-free (with provision of wheelchair accessible spaces) development is supported. Owing to its potential impacts, contributions are necessary to mitigate the proposal.</p> <ul style="list-style-type: none"> <li>• Contributions to be sought towards: <ul style="list-style-type: none"> <li>○ Public transport or highways works;</li> <li>○ Improvements to cycling facilities in the area;</li> <li>○ Cycle training;</li> <li>○ Pedestrian environment improvements;</li> <li>○ Public Realm Improvements;</li> <li>○ Parking permit free development arrangements;</li> <li>○ Car Club extension and membership.</li> </ul> </li> <li>• Conditions recommended for: <ul style="list-style-type: none"> <li>○ Signage and road markings and details of traffic calming;</li> <li>○ Electric vehicle charging points including spaces having passive provision for future upgrade.</li> <li>○ A car park management plan.</li> <li>○ Delivery and Servicing Plan.</li> <li>○ A Construction Management Plan.</li> <li>○ A Travel Plan for future occupants and construction workers.</li> </ul> </li> </ul>	<p>Highways and parking issues are discussed in section 17 of this report.</p> <p>See recommended conditions (Appendix 2).</p>
<p><b>Housing</b></p>	<p>Whilst the lack of social housing is disappointing, it is recognised that the financial viability position of the scheme means that the most desirable outcome in this instance is for intermediate units and it is recognised that</p>	<p>Affordable housing is discussed in section 13 of this report. The suggested obligations have been agreed and are</p>

	opportunities to maximise affordable housing on site. An early and late-stage review should be captured in the s106 and specific terms for the marketing and leasing of all affordable units should be agreed in advance with the council.	set out in section 21.
<b>Occupational Therapist</b>	Whilst the majority of accessible and adaptable units appear to meet the required standards, various details cannot be confirmed at this stage as the layouts of the room, including the location of furniture and appliances has not been shown.	A condition has been included requiring full details demonstrating compliance with Policy D7 (Inclusive design) of the London Plan. See recommended conditions (Appendix 2).
<b>Public Health</b>	Advise that a targeted detailed HIA is required. Where impacts are identified within the HIA recommendations should outline mitigation and monitoring measures.	A financial contribution of £200,000 has been secured as direct mitigation and a condition is recommended which requires a targeted HIA to be submitted to determine how best to mitigate any harm. See recommended conditions (Appendix 2).
<b>Sustainability</b>	Energy: approach is generally supported, subject to further improvement and provision of additional information and carbon offset payment, Sustainable Design and Construction: <ul style="list-style-type: none"> <li>• BREEAM Excellent rating for non-residential</li> </ul>	Sustainability and ecology are discussed in section 19 of this report.  See recommended conditions (Appendix 2).

	<ul style="list-style-type: none"> <li>• Home Quality Mark for residential (four (4) stars or 276 points (&gt; 240 HQM minimum))</li> <li>• Good standards of sustainable design and construction</li> <li>• Water: water efficiency through the installation of water meters, leak detection systems and water efficient appliances</li> </ul>	
<b>Tree Protection and Landscaping</b>	No objection to the proposal. Further details required on the to clarify tree sizes at planting stage.	See recommended conditions (Appendix 2).
<b>Urban Design Manager</b>	<p>In design terms, no concern is raised on the proposed ground floor layout of the scheme, which creates an engaging sequence of arrival to the central courtyard and a good level of pedestrian permeability across the site and its surroundings.</p> <p>The ground floor frontages are adequately activated. The residential lobbies are thoughtfully positioned at focal points in the designed public realm. Some concern was raised at pre-app on the limited improvements to Beresford Street, beyond the red line of the site.</p> <p>The designed double-loaded communal-corridors, high-percentage of single-aspect units, including north-east facing units, excessive number of units per core, are not considered as creating appealing sequences of arrival to the residential units or facilitate the design of high-quality accommodations.</p>	<p>A detailed analysis of urban design and impacts on heritage assets is discussed at section 14 of this report.</p> <p>A condition has been recommended seeking full details of the materials to be used to be submitted for approval prior to the commencement of development. See recommended conditions (Appendix 2).</p>

	<p>Despite its scale, the proposed massing and form within context are considered as creating a less than substantial impact on the neighbouring conservation area and listed buildings, mainly thanks to the partial screen created by the existing developments and approved schemes opposite Beresford Street on key views of the Grade I listed Brass Foundry. It is considered that the scheme steps-down in a legible manner towards the Woolwich Conservation Area, Beresford Square and the entrance to the arsenal from Plumstead Road (views 18 and 19 in the TVIA). On the View 11 from General Gordon Square/Woolwich New Road, the scheme would radically change the existing skyline, however it would not align with or compromise the Grade II listed Equitable House status as the mid-rise, local landmark of the square.</p> <p>The excessive height of tall Block A and proximity to Block B have some negative impact on the views approaching from western Beresford Street (View 15 in the TVIA) and on View 21 from the junction of Macbean Street and Powis Street.</p> <p>Overall, it is considered that the issues associated with the proposed massing should be weighed against the identified public benefits provided by the scheme, including affordable housing.</p> <p>A comprehensive condition should be included to ensure that</p>	
--	--	--



	<p>detailed technical section drawings (scale 1:5 and 1:10) are submitted for all type walls, roofs and outdoor spaces. These should show all joints between different materials and components, including walls, roofs, doors, windows, sills , metal fins, lintels and fasciae, balconies, soffits and balustrades, any external ramps, steps, pavements, boundary walls, gates, and fences.</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 and secured by conditions.</p> <p>Overall, the issues associated with the scheme's internal layout and visual impact on the surrounding historic context and heritage assets are significant and should be weighed against identified public benefits provided by the scheme, including maximising the number of affordable homes.</p>	
<p><b>Conservation Officer</b></p>	<p>The majority of the development site falls within the ‘commercial periphery’ zone characterised by its lack of heritage assets but falls immediately adjacent to the boundaries of Woolwich Conservation Area - there are 3 buildings (within the application site) which are included within the Woolwich Conservation Area boundary.</p>	<p>A detailed analysis of urban design and impacts on heritage assets is discussed at section 14 of this report.</p> <p>In general, however, it is noted that objections from both Historic England and the council’s Conservation</p>

	<p>The site is most prominent when viewed from Plumstead Road and Macbean Street. The established pattern of development facing Plumstead Road is low to medium in height. The proposed development proposal therefore had been considered in the context of how positively it responds to the established pattern of development and townscape in its context. In terms of height and massing it is considerably taller than the existing development pattern and historic grain, creating an awkward relationship with street level activities. The scale of the towers in relation to the street Plumstead Road will be noticeable.</p> <p>In this context the proposed development will cause harm to the significance of the Woolwich Conservation Area and the Royal Arsenal Conservation Area, as its height will undermine the fine-grained historic character, its low level consistent rooflines and prominence of distinctive local buildings and their architectural features. The development will have an impact on the setting of the Equitable House (currently a landmark designated heritage asset) by challenging its prominence in views of General Gordon Square, the Gate House at Beresford Square from Woolwich Conservation Area and have a harmful impact to the setting of the Grade I listed Brass Foundry and Grade II* listed</p>	<p>Officer have focused on the massing and height as causing a loss of significance to nearby heritage assets, namely the Grade I listed Royal Brass Foundry, the Grade II* Royal Artillery Barracks and the Grade II listed Equitable House.</p> <p>A condition has been recommended seeking full details of the materials to be used to be submitted for approval prior to the commencement of development. See recommended conditions (Appendix 2).</p>
--	---	--

	<p>former Board Room within the Royal Arsenal Conservation Area. Given the impact of harm to the setting and significance of the Royal Arsenal Conservation Area and the Woolwich Conservation Area, the planning balance must be carefully assessed for the wider and significant 'public benefit'.</p> <p>It should be noted that in terms of impact the proposed development will be highly visible not only from immediate local context, but also from long vistas and river views.</p> <p>To reiterate, whilst the proposed development is considered to be 'less than substantial harm' (due to the loss of three buildings included within the boundaries of the Woolwich Conservation Area, and the harm caused to the setting of a number of nearby designated heritage assets of exceptional architectural merit), public benefit must be clearly identified to justify this development proposal. The proposed impact of the taller buildings when viewed from the Royal Arsenal Conservation Area as well as the Woolwich Conservation Area, in particular from Beresford Street and Powis Street is of heritage concerns as they will have a visible impact visible impact on the skyline of the nearby Conservation Areas and on the setting of the designated heritage assets.</p>	
--	--	--

	<p>In the conclusion of its own THVIA, it acknowledges that, in relation to the Woolwich Conservation Area (TCA B), the cumulative impact would be moderate-major and adverse; and, in relation to the Royal Arsenal (TCA A), moderate and adverse.</p> <p>Generally, I am in agreement with Historic England and feel that the scheme is overly dominant and that the towers should have been reduced in height by at least 4 storeys.</p>	
<b>Waste Services</b>	<p>Tri-separator chutes - should have a contingency plan for residents to dispose of waste should there be a breakdown. Additional space requirements for rotation of bins on collection day.</p>	<p>See recommended conditions (Appendix 2).</p>

## 7.5 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>Speak Out Woolwich</b>	<ul style="list-style-type: none"> <li>• Object to the proposal: <ul style="list-style-type: none"> <li>○ Scheme is devoid of architectural merit</li> <li>○ Greenwich's Core Strategy/Policy does not support the siting of tall towers in such a sensitive location.</li> <li>○ Unsustainable materials proposed</li> <li>○ Height and design does not respond to surrounding heritage assets</li> <li>○ Unit mix is overly concentrated with studios and 1-bed units</li> <li>○ Affordable housing offer does not meet needs given there is a</li> </ul> </li> </ul>	<p>The concerns raised are discussed within the body of the report.</p>

	<p>housing crisis and does not comply with policy</p> <ul style="list-style-type: none"> <li>○ Blocks will create a canyon effect along Beresford St and create a wind tunnel effect</li> <li>○ Blocks will loom over Powis St, which has historic buildings</li> <li>○ Need more detail on a improved crossings over Beresford St</li> <li>○ Concern of the commercial units impacting on nearby high street shops, or that they will remain vacant similar to those in the Royal Arsenal.</li> <li>○ Misses opportunity to provide accessible homes at ground level for disabled people and there aren't enough disabled parking bays.</li> <li>○ Regret the proposed demolition of the Macbean Centre workshops, which is in the new Conservation Area and should be restored.</li> <li>○ Not enough detail of the use of spaces and commercial areas of the buildings.</li> <li>○ Insufficient amenity space for older children.</li> <li>○ Cycle lanes need to be extended to make it safe for the development</li> <li>○ 2-tier cycle parking isn't suitable for a lot of people</li> <li>○ Community engagement has been poor</li> <li>● Acknowledge support for the following reasons: <ul style="list-style-type: none"> <li>○ Development brings land back into use</li> <li>○ Build to rent model is supported</li> <li>○ Provides homes for key workers</li> <li>○ New public realm</li> </ul> </li> </ul>	
--	--	--

	<ul style="list-style-type: none"> <li>○ Increased permeability of the area</li> <li>○ Potential for a community venue</li> <li>○ Renewed provision for the market traders</li> </ul>	
--	---	--

## 7.6 Local Residents and Businesses

7.6.1 A total of 16 objections and 1 letter in support of the application were received following all three rounds of consultation, in 2019, 2020 and subsequently 2021. The total number of representations received is higher, however several representations from the same address at different times have been received over the course of the application and for the purposes of counting representations, comments, have been counted as one per dwelling. A summary of the consultation responses received from local residents and businesses are set out in the table below:

Summary of Comments
<p><b>Local Residents:</b></p> <p><u>Comments in support of the proposal:</u></p> <ul style="list-style-type: none"> <li>• Welcome the development of an underutilised site in the town centre;</li> <li>• Welcome the build-to-rent housing model.</li> </ul> <p><u>Objections to the proposal:</u></p> <ul style="list-style-type: none"> <li>• The scheme lacks connectivity and permeability through the site and town centre;</li> <li>• Siting and proximity of buildings to neighbouring properties may impact on potential future development, and may reduce access to light and privacy to neighbouring properties;</li> <li>• Public spaces are not visible from the site boundaries, resulting in an inward looking development;</li> <li>• The long, unbroken elevation along Beresford Street provides minimal active frontage and creates a barrier between the town centre and the Royal Arsenal;</li> <li>• The proposal lacks affordable housing;</li> <li>• Dust emissions during construction;</li> <li>• The demolition of the Macbean Centre (former Electric House) and workshop buildings would be a loss to the Woolwich Conservation Area and is not sustainable;</li> <li>• The Macbean Centre should be refurbished and included in the proposal as community space and/or workspace for creative industry;</li> <li>• If the Macbean Centre should be removed, there should be an obligation on the developer to undertake a photographic record of the</li> </ul>

interior and exterior of the building to be lodged with the Royal Greenwich Heritage Trust. Additionally, consideration should be given to salvaging historic features from the building for incorporation into the new development.

- The height of the proposed towers is excessive for the character of the location and to the detriment of surrounding heritage assets;
- Lack of family sized units, particularly at ground level, and too many studios and 1-bed units;
- Density exceeds the expectations for the site;
- The architecture and design of the proposal is unattractive;
- Contributions should be sought for cycle lanes and improving pedestrian safety;
- The public realm and the landscape design proposal is too hard and urban, the whole development needs more tree planting;
- Ground floor retail units will remain empty;
- The design will create wind tunnelling effects;
- The proposal will add further pressure on local health and education services;
- Limited engagement with the local community.

7.6.2 The concerns raised are discussed within the following sections of this report. The issues that aren't material planning considerations are not discussed as they do not form part of the assessment for planning permission.

## 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)**
- **Technical Housing Standards – Nationally Described Space Standard** (Department for Communities and Local Government – March 2015)
- **The London Plan (2021)** - Full details of relevant policies refer to appendix 3.
- **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” – 2014)** - Full details of relevant policies refer to appendix 3.
- **Planning (Listed Buildings and Conservation Areas) Act (1990)**
- 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 environmental effects arising from the development. The proposed development is considered to comprise Schedule 2 development because it is likely to have significant effects on the environment by virtue of factors such as nature, size or location. Consequently, the application is considered to form an application for EIA and it has been necessary that an Environmental Statement (ES) be prepared in accordance with EIA Regulations.
- 9.3 The applicant submitted an EIA Scoping Report in April 2019, outlining the proposed scope of the Environmental Statement (ES). The Royal Borough of Greenwich provided an EIA Scoping Opinion on 4<sup>th</sup> June 2019 in respect of a mixed use development within 5 blocks ranging in height from 2 to 22 storeys comprising up to 650 residential units with associated amenity space; up to 2,500 m<sup>2</sup> (GIA) commercial, retail, office and art spaces; re-provision of market pound storage; open space and public realm improvements; plant space including energy centre; refuse storage areas; and cycle parking and disabled car parking. This confirmed that the scheme constituted EIA development and set out advice and instructions in relation to the methodology and scope of the assessment, including the topics that should be assessed during the EIA process, as well as those topics that could be 'scoped out' of the EIA.
- 9.4 The scoping opinion recommended that climate change (as a separate topic), solar glare, and noise and vibration matters should be scoped into the ES, which were proposed to be scoped out by the applicant. The scoping opinion also provided recommendations regarding the parts agreed to be scoped in, alternative scenarios and cumulative effects. Following the scoping opinion, the scope of the ES supporting the application is summarised in the following table:



Matters Scoped In	Matters Scoped Out
<ul style="list-style-type: none"> <li>- Air</li> <li>- Archaeology</li> <li>- Daylight, sunlight &amp; overshadowing</li> <li>- Wind microclimate</li> <li>- Ground conditions and contamination</li> <li>- Socio-economics</li> <li>- Townscape, visual and built heritage</li> <li>- Transport and access</li> <li>- Water resources, flood and drainage</li> </ul>	<ul style="list-style-type: none"> <li>- Ecology</li> <li>- Aviation</li> <li>- Artificial lighting</li> <li>- Telecommunications</li> <li>- Services and utilities</li> <li>- Sustainability, energy and waste</li> <li>- Health and wellbeing</li> <li>- Major accidents and disasters</li> <li>- Noise and vibration</li> <li>- Solar glare</li> </ul>

- 9.5 The submitted ES (June 2019) and the ES Addendums (May 2020 and November 2020) identify the likely significant effects that the development may have on the environment, both during construction and once complete, and outlines how these effects can be avoided or reduced. The impacts of the proposed development are assessed individually and cumulatively with other consented applications in the vicinity of the application site. In accordance with the Environmental Impact Assessment Regulations 2017, the assessment of the proposed development in this report refers to the content and analysis contained within the ES and ES Addendum and comments upon its findings and conclusions. Officers consider the scope and content of the applicant's ES/ES Addendum to be acceptable.
- 9.6 RBG officers commissioned an independent review of the ES and an initial review report was issued in September 2019, with a further review report issued on 19 March 2020 following the submission of the ES Addendum. The ES was further updated in November 2020 as matters of clarification were required. The independent review report advises that the ES and ES Addendums provide a full account of the development proposed in the planning application and the likely significant effects on the environment including measures to mitigate any environmental effects. This report specifies how these measures are to be secured if the application is granted planning permission i.e. through planning conditions and/or planning obligations. It is considered to contain sufficient environmental information to enable determination of the planning application.
- 9.7 Consultation on the original ES was carried out for 30 days in accordance with the Regulations. The amendments submitted in May 2020 included revised information in respect of the ES and as such further consultations were carried out and a notice published in the press in accordance with Regulation 19 of the above Regulations.

- 9.8 The November 2020 amendments sought only to provide clarifications to further requests for information, and having been reviewed by LUC, were considered acceptable and are sufficient to allow the local planning authority to proceed to determination (subject to referral to the Mayor). Notwithstanding this, public notification for a period of 21 days was carried out in April 2021 prior to the application being presented at Planning Board.
- 9.9 Conditions are recommended to ensure that the development is carried out in accordance with the parameters assessed in the ES (for the full wording of these refer to Appendix 2).

## **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: 19/2498/F):
- Principle of development (Section 11);
  - Residential Mix (Section 12);
  - Affordable Housing (Section 13);
  - Design, Townscape and Heritage (Section 14);
  - Quality of the Residential Environment (Section 15);
  - Impact on the amenity of nearby properties (Section 16)
  - Transport and Access (Section 17);
  - Waste and Recycling (Section 18);
  - Sustainability, Energy and Ecology (Section 19);
  - Socio-economic effects (Section 20);
  - Legal Agreement (Section 21);
  - Public Sector Equality Duty (Section 22);
  - Conclusion and Planning Balance (Section 23)

## **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 “*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 regards to economic growth the NPPF states "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt*". The NPPF also supports the positive growth of Town Centres and states at paragraph 85 "*Planning policies should: ... allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed*".

- 11.3 Paragraph 117 states "*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*".
- 11.4 The NPPF supports economic growth and at paragraph 80 states "*Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*". In regards to town centres, the NPPF states at paragraph 85 "*Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation*".
- 11.5 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 in Opportunity Areas, on surplus public sector land, and 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.
- 11.6 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.

- 11.7 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.
- 11.8 Policy SD1 (Opportunity Areas) of the London Plan sets out that within Opportunity Areas, proposals should clearly set out how they will encourage and deliver the required level of growth, plan for and provide necessary social infrastructure to sustain growth and create mixed and inclusive communities, support the creation of employment opportunities, recognise the role of heritage in place-making, include ambitious transport mode share targets and support wider regeneration whilst ensuring that they integrate into the surrounding areas. Opportunity Areas are identified as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two, and this is the indicative target for Woolwich Opportunity Area.
- 11.9 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.
- 11.10 As such, where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. When a proposed development is acceptable in terms of use, scale and massing, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development, having due regard to the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

- 11.11 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.
- 11.12 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.
- 11.13 In addition, Policy H1 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.
- 11.14 Policy SD6 (Town centres and high streets) of the London Plan states that the vitality and viability of London's town centres should be promoted and enhanced by encouraging strong, resilient and accessible hubs with a diverse range of use that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community social and residential uses. Moreover, proposals should complement local character and heritage assets whilst optimising residential growth potential in appropriate locations
- 11.15 The Royal Greenwich Core Strategy with Detailed Policies (2014) acknowledges the Opportunity Area designation of Woolwich under the London Plan and identifies the Woolwich Town Centre as a Strategic Development Location under the Spatial Strategy. Policy H1 of the Core Strategy states "*New housing is expected to be developed in Royal Greenwich's six Strategic Development Locations*" and that "*Specific sites for housing growth will be identified in more detail in a site allocations local plan*". Policies TC1 (Town Centres) and TC2 (Woolwich Town Centre) support major town centre and

residential developments in the Woolwich Town Centre and Policy EA1 (Economic Development) supports business growth in Town Centres.

- 11.16 The site forms part of Site 12 (Beresford Street) as identified within the Woolwich Town Centre Masterplan SPD. The SPD recognises that the site should be developed for a mix of uses and that the design should be of a high quality. It also seeks to improve connections between the Royal Arsenal and Powis Street through active frontages and acknowledges the site's role in accommodating the Beresford Market Pound.
- 11.17 The application site is included within the allocated site MU9 (Macbean Centre and former Woolwich Polytechnic) under the saved Unitary Development Plan (UDP) Site Proposals Schedules, which is included in Appendix I of the Core Strategy. The allocation seeks the redevelopment of the site for mixed development of town centre uses including retail, and a possible covered shopping mall.
- 11.18 The site allocation W4 (Vacant Lot on Macbean Street, Market Pound, 1-4 Beresford Street and 1-3 Beresford Square) under the Draft Local Plan – Site Allocation Proposed Submission (published for consultation in 2021), continues to encourage the redevelopment of the site under an updated site allocation. The emerging SALP proposes the site for mixed use development appropriate to the town centre, including re-provision or satisfactory relocation of market storage area, B1 workspace suitable for SMEs, residential use in the upper floors and public open space with a public pedestrian route between Powis Street and Beresford Street.
- 11.19 The current allocation of the site (MU9) and draft allocation of the site (W4) both seek the redevelopment of the site to optimise its accessible town centre location. The site's allocation reflects the objectives of the local, regional and national policies which together seek to make the best use of brownfield land, create good growth, and address the needs of the community.
- 11.20 Further to this, Policy H11 of the London Plan (Build to Rent) and the Mayor's Affordable Housing & Viability SPG recognises that the planning system should take a positive approach to the Build to Rent (BTR) sector, recognising its importance as contributing to a mix of housing types and tenures.
- 11.21 At a local level, Policy H1 of the Core Strategy acknowledges the increasing need for additional and appropriate housing stock in the Royal Borough. More specifically, draft site allocation W4 recognises the ability of the application site to deliver new homes.

- 11.22 In addition, Policy EAI of the RBG Core Strategy states “*The Royal Borough supports the expansion of existing businesses and increased employment opportunities*”. Policy TC1 states “*Town centres are the preferred location for major retail, leisure, cultural, office and other uses that attract and serve the public*” and that “*Residential development in town centres is supported*”. In particular to the Woolwich Town Centre, policy TC2 states “*Woolwich will accommodate the majority of additional town centre development in Royal Greenwich over the plan period*” which, includes retail and office floorspace.
- 11.23 The proposed residential-led, mixed use proposal is considered to include an appropriate range and quantum of uses, introducing a significant level of residential units in a town centre location, thereby contributing to the aspiration of making Woolwich a Metropolitan Centre over the plan period, but also comprising approximately 2000 m<sup>2</sup> of commercial floorspace adjacent to Powis Street. The principle of development and range of uses is supported by the GLA.
- 11.24 The site is identified to be a central location, has a PTAL of 6 and predominantly consists of smaller sized units due to its build-to-rent nature. Therefore, it is afforded the highest density range within table 3.3 of the 2016 London Plan (now superseded), being 215–405 units per hectare (u/ha). The proposal contains 595 units with a site area of 1.175ha, which equates to a density of 506 u/ha, which exceeds the highest density ranges of the 2016 London Plan. However, as set out above, the London Plan (2021) removes a reliance on the density matrix in favour of a design-led approach which optimises site potential.
- 11.25 In addition, whilst the net density range is still higher than that recommended by the density matrix under Policy 3.4 of the London Plan (2016), the supporting paragraph to the policy advises not to apply the matrix mechanistically, and in any event has now been superseded and is discussed here for context only. As discussed in the following sections, the proposed development achieves an acceptable standard of residential environment, and therefore despite the exceedance in the density the proposal is considered to represent an appropriate level of development of the site. Furthermore, the desirability of promoting housing delivery and regeneration on this site is established through the London Plan (2021) and Core Strategy (2014) policies, which identify the area as a Strategic Development Location.
- 11.26 In accordance with Policy D3 of the London Plan, which requires local planning authorities to optimise site-capacity through the design-led approach, the scale and bulk of the proposal is considered to be in keeping with the character of recent development in the area and, as discussed later on this report, is compatible with the aims for Woolwich to achieve Metropolitan

Centre status. The area is also considered appropriate for tall buildings as per Policy DH2 (Tall Buildings) of Greenwich's Core Strategy, and the impact to heritage assets' setting is considered 'less than substantial', as discussed in the following sections. The proposed development also brings forth a number of public benefits further discussed below.

- 11.27 As such, having regard to Policies GG3, GG4, and particularly Policy D2 of the London Plan which seeks to encourage densification in areas well connected by public transport, it is considered that the proposal would optimise the residential capacity of the land and the proposed density.
- 11.28 The area in the north-east corner of the existing site is used by the market traders in Beresford Square as a storage area. As identified in the draft SALP a market storage area is to be re-provided in any redevelopment of the site. The proposed development includes 357 m<sup>2</sup> of market storage, which is to be enclosed within the ground floor of Block D with double storey high ceilings and a part mezzanine floor. The proposed market store sits at the Beresford Street frontage of Block D to provide easy access for the market traders from Beresford Square. The store will be provided to the Council at a reduced rent for sole purpose as a storage area for the market traders, and this would help to support the continued functioning of Woolwich's open air-market.
- 11.29 Further, the proposal includes 2022 m<sup>2</sup> of flexible commercial floorspace, which could be used for various town centre uses at ground, with active frontages fronting directly onto the public realm. This space could be subdivided into a number of units and could be used to support a range of business sizes and types (including SMEs as envisaged by the site allocation). It is considered that the proposed commercial spaces complement the existing town centre uses and provide an active and engaging link between the Royal Arsenal and Powis Street, thereby contributing to wider town legibility.
- 11.30 It is further noted that the ES (and addendums) estimate that the proposal would result in the creation of 103 net additional jobs, of which 81 are estimated to be taken up by London residents and this is a benefit of the scheme.
- 11.31 For the reasons outlined above, the proposal is considered to provide an appropriate mix and quantum of uses which are representative of the town centre location, providing a critical mass of housing which supports the wider objectives of Woolwich and aligns with the principles of the NPPF, the London Plan and the Royal Greenwich Local Plan.



## 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 housing mix:

<b>Unit type / size</b>	<b>Private Market Rent</b>	<b>Intermediate Affordable Housing</b>	<b>Total</b>
Studio	147 (31%)	17 (14%)	164 (28%)
1-bed	160 (34%)	39 (33%)	199 (33%)
2-bed	162 (34%)	40 (33%)	202 (34%)
3-bed	7 (1%)	13 (11%)	20 (3%)
4-bed	0 (2%)	10 (8%)	10 (8%)
<b>Total</b>	<b>476 (100%)</b>	<b>119 (100%)</b>	<b>595 (100%)</b>

- 12.5 The development proposes a fairly even and proportionate mix of unit sizes across the tenures but with a clearly higher proportion of studio, one and two-bedroom units with limited provision of 3- and 4-bedroom units. It is noted however that within the two-bedroom units, most are proposed as two-bedroom, four-person flats, with a total of 68 two-bedroom, three person flats compared to 134 two-bedroom, four person flats which is the more desirable in practice. There is demand for 3+ bedroom sized

accommodation in the Royal Borough, however it is considered that the proposed unit mix is acceptable and accords with the abovementioned policies for the following reasons.

- 12.6 Firstly, the proposal is the first Build-to-Rent scheme in Woolwich and therefore there are current zero units of any size or tenure in the current private or affordable market of this type in the vicinity. The proposal therefore provides the area with a more diverse range of housing types which supports wider objectives of London and Local Plan objectives. Being Build-to-Rent the proposal relies on income through rent over a number of years, rather than an upfront return on sales and therefore a higher provision of larger unit sizes would lower overall unit numbers and consequently drive down the viability of the scheme, which would further impact on the affordable housing provision. It is worth noting that following revisions to the unit mix, the larger units (3- and 4-bedroom units) have been increased overall and skewed towards the affordable housing provision, and consequently there is a high proportion of studio units within the market tenure.
- 12.7 The application site is an allocated site designated for mix-use development regeneration within the Woolwich Town Centre, which is targeted for Metropolitan Centre status, and the area is identified as an Opportunity Area, a Strategic Development Location and a Strategic Area for Regeneration. As such, there is an expectation for development to be optimised on this site. The higher proportion of smaller units on this site allows for higher unit numbers and the provision of 1- and 2-bedroom units in new development also plays a role in reducing pressure on the conversion and subdivision of existing family sized housing stock in the area and therefore the proposal aligns with policy H10 Part A.
- 12.8 The location of the development site is central within Woolwich Town Centre and within very close proximity to several forms of public transport, which (in line with policy H10 Part A) lends itself towards higher proportions of 1- and 2-bedroom sized units.
- 12.9 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 (including Financial Viability Assessment)**

- 13.1 Policy H4 (Delivering affordable housing) of the London Plan 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. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).
- 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 this SPG.
- 13.7 Policy H11 of the London Plan states that Build to Rent (BTR) developments should provide a specific approach to the affordable housing offer, where the aim is to maintain the integrity of the Build to Rent development, with unified ownership and management of all the homes. BTR developments should seek to promote Discount Market Rent (DMR) as the affordable housing offer and the Mayor’s Viability SPG expresses the preference for DMR homes to be let at London Living Rent (LLR) levels. Further, the Mayor’s Viability SPG reiterates the requirement, in line with the national definition of affordable housing, that any on-site affordable housing must include provisions to remain at an affordable price in perpetuity or that any subsidy must be recycled for alternative affordable provision.
- 13.8 The proposed development offers to provide 20% of the BTR units as affordable housing units, being DMR units that would be split between 30% at LLR and 70% at a range of discounts. The affordable housing tenure split is illustrated in the following table:

<b>Affordable Housing Tenure Split</b>								
<b>Unit Tenure</b>	Studio	1 bed	2 bed	3 bed	4 bed	Total	%	Affordable Split
<b>DMR (LLR)</b>	0	12	13	5	6	36	20.0%	30%
<b>DMR (Range of discounts)</b>	17	27	27	8	4	83		70%

<b>Private Market Rent</b>	127	167	158	16	8	476	80.0%	
<b>Total</b>	164	199	202	20	10	595	100%	

- 13.9 The proposal falls below the 35% affordable housing threshold and therefore is not applicable for the Fast Track route. As such, the proposal has been subject to the Viability Tested Route and the applicant has provided supporting viability evidence for scrutiny by the Local Planning Authority. To assist with RBG officer's scrutiny of the viability evidence the Royal Borough appointed BPS Chartered Surveyors to independently review the viability evidence and provide third party appraisals and participate in discussions to test the viability evidence.
- 13.10 Officers have thoroughly scrutinised the viability evidence and have questioned a number of inputs in the appraisals provided by Quod, which will be expanded on in the following paragraphs. However, it is considered that the inputs in the final appraisal provided by Quod are acceptable and the final advice from BPS concludes that the proposal provides the maximum reasonable contribution to affordable housing. BPS conclude that the proposal *“results in a deficit of £571,000 representing 0.25% of GDV. For a scheme of this size we consider this equates to a break-even position and therefore we accept that no further affordable housing can viably be provided”*.
- 13.11 When considering viability, it is important to note that BTR developments are a different model to build for sale developments, which are the typical model of residential development in the Royal Borough. The London Plan highlights that this is because the BTR model relies on income through rent over a number of years, rather than an upfront return on sales and because of this it may generate lower initial land values.
- 13.12 On top of the BTR model of the proposal, the development of the application site is complicated by the conflict between the high demand for growth in the area, its sensitive location in the context of several significant heritage assets, and the relatively low value of the area due to its location and distance from central London. Essentially, the erection of large, high quality buildings in a comparatively low value area results in a compromised viability position. Notwithstanding this context, officers have scrutinised the viability in the followings way.
- 13.13 The Benchmark Land Value (BLV) has been extensively reviewed to ensure that the appraisal sets an appropriate value for the site. This seeks to prevent appraisals that allow for an overpayment for a development site at the cost of affordable housing.

- 13.14 The applicant's BLV initially assumed that the site could be used in perpetuity as open storage land, which resulted in a BLV of the site at £9.24m. However, the site is located in a high growth area, it is identified as an allocated site in the draft SALP, and its recent planning history includes applications for similar uses that have been refused as they would compromise the expectations of future development of the site. As such, officers considered that a planning use for storage into perpetuity was not a reasonable assumption. After further discussions the applicant proposed an Alternative Use Value (AUV), which was based on the redevelopment of the site to provide office and flexible town centre uses in line with the currently adopted site allocation under the saved UDP Sites. For the purposes of establishing an AUV this has been agreed by officers and BPS advise that it results in an AUV of £3.69m.
- 13.15 The inputs of the development values including rents and yields, and the evidence supporting this, are considered to be acceptable. Policy H11 of the London Plan sets out the criteria that a BTR development must meet to be defined as BTR, which includes a requirement that the units are held as BTR under a covenant for at least 15 years. The cashflow provided by the applicant indicates that the development would hold the units under the covenant for the minimum amount of time, and whilst this is considered to be relatively short for viability purposes, it meets the policy objective. Furthermore, BPS advised that the Net Initial Yield (NIY) it generates is acceptable and therefore the 15-year period is considered acceptable, to be secured through the s106 agreement. Therefore, the estimated GDV is agreed by officers.
- 13.16 The viability appraisal has been reviewed by BPS, an independent financial viability assessor, who has concluded that the inputs and evidence are agreed to generate a break-even position for the proposed development. As such, BPS has confirmed that the proposed affordable housing offer of 20% with a tenure split of 30% at rents equivalent to London Living Rent (LLR) to 70% at a range of discounts is the maximum amount of affordable housing that can reasonably be provided. BPS also recommend that because of this the development should be subject to a late stage review of viability to test the viability of the scheme over its Lifetime. RBG officers have reviewed the evidence and reviews and agree with this conclusion.
- 13.17 The policies and SPG discussed in this section set out a target for affordable housing in this development at 35%. As the proposal falls short of that target it has followed the Viability Tested Route, which demonstrates that the proposal results in a break-even position and therefore any offer of affordable housing is at the developer's risk. The offer of 20% affordable housing is therefore welcomed and represents a public benefit that would be provided by the scheme. It should be noted that at the outset, the affordable housing

offer was not known by the applicant as it was to be tested through the application process, and the provision of 20% affordable housing negotiated between the local planning authority and the applicant does not represent a reduction in the affordable housing offer as a result of the high quality design required by the local planning authority for this important and architecturally sensitive site.

13.18 As discussed earlier in this section, the proposal offers Discount Market Rent (DMR) units, which comprises 36 units at rents equivalent to London Living Rent (LLR) and the remaining 87 intermediate affordable housing at a range of discounts as shown in the tables below. LLR is one of the Mayor's preferred affordable housing tenures and is described as a form of intermediate affordable housing that offers Londoners on average incomes a lower rent, which varies by ward across London to enable the occupants to save for a deposit. The remaining DMR units at the range of discounts need to be genuinely affordable to be considered as an affordable housing product in line with paragraph the London Plan.

13.19 The following tables indicate the proposed rents for the LLR and DMR units respectively:

<b>London Living Rents</b>			
Unit Size	LLR (p/w)	% of Market Rent	Housing Income required (GLA Method)
1 bed	£208	58%	£38,000
2 bed	£232	53%	£42,200
3 bed	£255	47%	£42,000
4 bed	£278	46%	£51,000

<b>Discounts Market Rents</b>			
Unit Size	DMR (p/w)	% of Market Rent	Household Income required (GLA Method)
Studio	£250	80%	£46,500
1 bed	£272	76%	£50,000
2 bed	£298	68%	£55,000
3 bed	£324	60%	£60,000
4 bed	£324	54%	£60,000

- 13.20 The London Plan and Affordable Housing and Viability SPG both support affordable housing units in BTR schemes being provided as DMR units. The SPG states at paragraph 4.20 “*the affordable housing offer can be entirely discounted market rent (DMR), managed by the Build to Rent provider and delivered without grant*”. In addition, paragraph 4.21 of the SPG states “*Discounted market rent is also better suited to Build to Rent than other affordable products because units can more easily be tenure blind and “pepper potted” through the development*”. The affordable housing offer of DMR units therefore aligns with the Mayor’s policy and adopted guidance, and given that RBG does not have a BTR policy it is considered that the affordable housing offer comprising only DMR units is acceptable subject to the discounts being genuinely affordable.
- 13.21 Paragraph 4.23 of the SPG states “*The Mayor would prefer the DMR homes to be let at London Living Rent levels, to ensure city-wide consistency in approach... earn the public’s trust as being genuinely affordable*”. The DMR units that would be let at rents equivalent to LLR are therefore supported by this guidance. At paragraph 4.25 the SPG states “*Where the LPA and developer identify a specific local need, a wider mix of discounted market rent products may be provided. If not delivered as London Living Rent, then the LPA must ensure that the discounted market rent units fully meet the London Plan definition of intermediate housing and are affordable to those eligible for intermediate rented housing in London*”. The remaining DMR units are therefore subject to meeting a demonstrated housing need.
- 13.22 The Housing and Viability Statement identifies how the proposed affordable rents align to local needs by examining the local wages of key workers based on the Annual Survey for Hours and Earnings (ASHE) income data for 2019 and the potential household incomes this could generate. It demonstrates how a combination of single or dual incomes of key workers would be able to afford the rents of the DMR units at the rent levels of either LLR or other DMR units depending on their size. It is further worth noting that the London Plan states that “*all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000*”. As demonstrated in the above tables the rents for the DMR units would be capped so that they remain affordable to households on incomes of up to £60,000 in line with the NLP.
- 13.23 It is considered that the evidence provided demonstrates that the proposed DMR units would meet the Mayor’s requirements for affordable housing in BTR developments and would address an identified housing need in the area. As stated in Quod’s Affordable Housing and Viability, “*Based on the potential rents the homes would be affordable to (and households be eligible for) c.40% of the borough equating to c.50,000 households in Greenwich (CACI 2019)*”. The



proposal would also be built to a high standard and would be solely maintained and managed by an established BTR provider.

- 13.24 The proposed development would provide 595 BTR units in the heart of Woolwich Town Centre, which is identified as an Opportunity Area and Strategic Area for Regeneration under the London Plan. It would be the first major BTR development in Woolwich with unified ownership and management and is proposed by one of the leading BTR housing developers in the UK. The proposal would therefore fill an existing gap in the local housing market, will make a significant contribution to housing delivery in the Borough and will accelerate the ambition for Woolwich to achieve Metropolitan Centre status.
- 13.25 The viability assessment demonstrates that the proposed development represents a break even position financially without any affordable housing provision. Despite this, the applicant offers 20% of its units as DMR (which totals 119 units), comprising 30% of these at rents equivalent to LLR and the remaining at a range of discounts that offer genuinely affordable rents. The evidence submitted also demonstrates that the affordable housing offer would contribute to addressing an identified housing need.
- 13.26 Given that the application has taken the Viability Tested Route the development would be subject to both early and late stage review mechanisms in accordance with the London Plan and the Mayor's Viability SPG. The early stage review is aimed at incentivising the delivery of housing, and in particular affordable housing, whilst the late stage review is aimed at maximising the contribution towards affordable housing (and in turn improving the public benefit of the scheme) should circumstances result in an improved level of viability. Therefore, if the overall development was supportable, the Royal Borough would ensure that the review mechanisms were secured within the s106 agreement.
- 13.27 The review mechanisms would be based on outturn costs and values, so that if improvements in viability result in a more significant profit surplus being generated, this can trigger the delivery of more affordable housing. In line with the Mayor of London's Affordable Housing and Viability SPG the early review mechanism would be triggered in the event that substantial implementation construction works of the development have not commenced within 2 years of the date of planning permission. The late stage review mechanism would be triggered when 75% of the private rental units have been let.

13.28 In line with the paragraph 4.41 of the SPG, in the event that the viability improves the preference is for any surplus to contribute towards additional affordable homes in the development. Where this is not achieved the surplus should allow for deeper discounts on the secured affordable housing provision.

13.29 The viability assessments from both the applicant and the independent surveyor sufficiently demonstrate that the proposed offer is the maximum contribution that can be reasonably expected given the specific circumstances of the site and nature of the proposed development. The affordable housing units would need to be secured by a Legal Agreement, including agreement of review mechanisms. Subject to this, it is considered that the proposed offer of affordable housing is on balance acceptable in accordance with policy H3 of the Core Strategy (2014), policies H5, H6 and H11 of the London Plan (2021) and the Affordable Housing and Viability SPG (2017).

#### **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 HCI 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. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Moreover, development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 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. 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. 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, and 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.

- 14.12 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.
- 14.13 In addition, Policy DH2 of the Royal Greenwich Local Plan states that tall buildings may be appropriate in 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.
- 14.14 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 the Conservation Area should respect the setting of that area.
- 14.15 Policy DH(i) of the Royal Greenwich Local Plan (Statutory Listed Buildings) sets out that there will be a presumption in favour of the preservation of listed buildings and proposals for development which would detract from the setting and proportions of a Listed Building (or group) will be resisted. In addition, Policy DH(j) (Locally Listed Buildings) sets out that substantial weight will be given to protecting and conserving the particular characteristics that account for the designation of buildings on the Local List of Buildings of Architectural or Historic Interest.
- 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 The Royal Borough will seek to secure the co-operation of developers in the excavation, recording and publication of archaeological finds before development takes place by use of planning conditions and/or legal agreements as appropriate.
- 14.18 The proposed development comprises a comprehensive mixed-use development consisting of five blocks, labelled Block A to Block E, as well as a podium element connecting Blocks A to C along Beresford Street from Macbean Street to Murray's Yard. The proposed maximum heights for each block are 19-storeys for Block A, 22-storeys for Block B, 16-storeys for Block C, 10-storeys for Block D and 7-storeys for Block E. The proposed podium element along Beresford Street is 9 – 11 storeys in height, whilst a lower podium between Blocks A and B is 2 storeys in height.
- 14.19 The proposed buildings are stepped and contain landscaped roof terraces above the 10-storey roof of Block B and the 7-storey roof of Block D. The roof of the podium fronting Beresford Street would also contain a landscaped roof terrace.

#### **14.20 Layout and Public Realm**

- 14.21 The application site is an important site for the context of Woolwich, and as set out in the draft Site Allocations DPD, a new public space should be provided as part of a new and enhanced pedestrian route which connects Powis Street with Beresford Street, encouraging east-west movements between the Royal Arsenal and the town centre incorporating Murray's Yard (an alley leading off Powis Street).
- 14.22 It is considered that the proposed layout optimises existing desire lines and encourages future connections both through and from within the site. In addition, the L-shaped building form of Blocks A, B and C is an efficient response to the site given the surrounding environment as it appropriately creates a presence Beresford Street principally, but also to Macbean Street whilst strategically outlining an internal courtyard which could be a great asset to the community. In this regard, it is considered that the proposed courtyard area would foster a sense of community by providing an easily accessible, active gathering space for its residents and their guests.

- 14.23 Blocks A, B and C are connected through the introduction of a double storey podium base, and this both protects the new public spaces from the noise of Beresford Street whilst providing a human scale to the streetscene. It further provides an opportunity for increased active frontage bringing further animation to the street. Block D is considered to complement the taller blocks in terms of its layout, representing an appropriate transition from Beresford Square whilst reinforcing the street pattern of Beresford Street, whilst also welcoming pedestrians from the market to the North East. Block E's orientation follows the historic grain of the site, running parallel to Powis street, occupying the southern boundary of the site. Its positioning is a response to the emphasis on public realm and visible sightlines, and it's height and massing reflect its proximity to Powis Street and the generally lower-rise built form.
- 14.24 The proposed development includes a well-proportioned area of public realm in the centre of the site, providing a crossroads of pedestrian routes, accessible from Macbean Street in the west and Murray's Yard in the south (providing routes through to Powis Street) and accessible from Beresford Street to the east. This area of public realm would be fully accessible for all and would be activated by commercial uses at ground floor level help define the proposed area as an extension of the town centre high street, with carefully positioned residential entrances at the focal points.
- 14.25 Moreover, it is recognised that public realm has been oriented to take advantage of direct sunlight, receiving most of its sunlight in the morning and the evening, and the design of the entrance from Beresford Street allows for direct visual and physical links to the adjacent streets, in accordance with the aims of Policy TC2 of the Royal Greenwich Local Plan.
- 14.26 In addition, a financial contribution of £32,000 has been secured towards the implementation of off-site pedestrian and cycling upgrades on Beresford Street to promote active modes of travel, to be secured through a s106 agreement. In addition, the applicant would enter into a section 278 agreement with the council requiring the applicant to commit to the improvements to Murray's Yard and extension for pedestrian access from Powis Street to Beresford Street through the site as part of the public realm, to include prevention of vehicle access from Powis Street from site. The section 278 agreement would further require the footway along the site frontage (on Macbean Street and Beresford Street) to be re-laid in line with the Healthy Streets approach of the London Plan.
- 14.27 On the basis of the above, it is considered that the proposal would create a welcoming public realm which serves the dual function of promoting movements between the Royal Arsenal and Powis Street and provides a

contextual response to the existing environment, whilst increasing permeability for the town centre as a whole and reinforcing the street hierarchy for this part of Woolwich.

#### **14.28 Massing and Built Heritage**

- 14.29 As set out above, The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development would lead to 'substantial harm' or total loss of the significance of a designated heritage asset, consent should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 14.30 Whilst the site does not contain any statutorily or locally listed buildings there are two new additions to the local list that adjoin the site on Macbean Street and the properties surrounding Murray's Yard on the northern side of Powis Street. The recently adopted Woolwich Conservation Area boundary, which draws its heritage significance, in part, from its consistent roof lines and well-preserved Victorian and Edwardian shop buildings at a consistent height of 3 storeys, includes three buildings within the proposal site, however, the majority of the development site falls within the 'commercial periphery' zone which is characterised by its lack of heritage assets. The Macbean Centre is included within the conservation area boundary because of its historical association with (and physical attachment to) the former Electric House electricity showroom on Powis St (44-48).
- 14.31 To the east the site is adjacent to Beresford Street, which is a busy main road. On the other side of the street, it faces the Royal Arsenal, which includes the Grade I listed Royal Brass Foundry, several Grade II\* and II listed buildings and is covered by the Royal Arsenal Conservation Area.
- 14.32 As such, any proposal for the redevelopment of the site must preserve or enhance the settings of the Grade I listed Royal Brass Foundry, the Grade II listed buildings at the Royal Arsenal and around Beresford Square, the



numerous locally listed buildings in the vicinity and the Woolwich and Royal Arsenal Conservation Areas.

- 14.33 The proposed development would introduce a substantial amount of built form within the site, with three buildings between 7-22 storeys in height arranged around a central courtyard connecting Macbean Street, Beresford Street and Murray's Yard, with the three taller buildings rising to 19, 22 and 16 storeys for Blocks A1, B and C1 respectively.
- 14.34 Consequently, views from short, mid and long range should be carefully considered to ensure the proposal reinforces the spatial hierarchy of the local and wider context and aids legibility and wayfinding, whilst being mindful of Policy D3 which requires all developments to make the best use of land by following a design-led approach that optimises the capacity of sites and encourages higher density developments in locations that are well connected to jobs, services, infrastructure and amenities.
- 14.35 In support of the application, a Townscape, Visual Impact and Heritage Assessment (TVIHA) was submitted, and later amended through the submission of addendums. The TVIHA identifies various viewing locations which could be affected by the proposed development and assesses both the sensitivity of the viewing location to change and the magnitude of the impact, and combines these two factors to derive the significance of the proposal to townscape and views as either major, moderate, minor or negligible.
- 14.36 The TVIHA sets out five broad character areas; the Royal Arsenal Conservation Area, the Town Centre (including Woolwich Conservation Area), Woolwich Common Conservation Area, the industrial estate to the south-east beyond the Royal Arsenal, and the predominantly low-rise residential areas with various architectural styles to the south and west of the town centre, and assesses 31 verified views from within these character areas. Of these character areas, the most sensitive to change are the Royal Arsenal Conservation Area and the Woolwich Conservation Area, and tall buildings which affect these townscapes, whether part of a group or as a stand-alone building, should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding in accordance with Policy D9 of the London Plan.
- 14.37 The proposed development would be visible from several locations within the Royal Arsenal Conservation Area, when looking in a south-westerly direction, by reason of its proposed height and as a result of the regular geometric layout of the Arsenal which allows for long and often symmetrical views.

- 14.38 No. 1 Street is the most prominent example, and is a well-balanced visual corridor linking the Grade I listed Brass Foundry near the western boundary with Woolwich Pier by the riverfront. The proposed development would be glimpsed above the existing building line at various points along No. 1 Street, becoming more visible the further westward the viewpoint is, becoming clearly visible in views where there are gaps between buildings and adjacent to the Brass Foundry. Within these views, it is considered that the level of impact individually would be moderate, partially obscuring the visible skyline behind the Brass Foundry from some views, however due to its complementary material palette, and variation in height between blocks, would retain the relatively open aspect visible from within the Arsenal.
- 14.39 Moreover, as shown in View 29, it is considered that the proposed development would form part of the group of tall buildings already within and surrounding the Royal Arsenal, reinforcing the spatial and height hierarchy of the Beresford Street corridor, reflecting the emerging context of Woolwich's skyline.
- 14.40 Nonetheless, whilst it is recognised that the proposal has sought to overcome all concerns related to impact on heritage assets from within the Royal Arsenal, it should be noted that the proposal does cause some harm to the principal vistas, which should be considered in the context of other benefits of the scheme and the emerging context for Woolwich.
- 14.41 The proposed development would be prominent from Beresford Street in short and mid-range views, which is comparatively less visually sensitive than both the Woolwich and Royal Arsenal Conservation Areas. From these viewpoints, whilst the proposal represents a substantial mass, it is considered that the scheme steps-down in a legible manner towards the Woolwich Conservation Area, Beresford Square and the entrance to the Arsenal from Plumstead Road, as demonstrated from Views 18 and 19.
- 14.42 Owing to the tight-knit urban grain of the site's immediate context, the proposal would not be visible from all parts of the town centre, especially Powis Street as shown in views 17 and 22. However, the existing skyline from within General Gordon Square, which provides an open aesthetic context for the Grade II listed Equitable House, would radically change with the introduction of the proposed built form. It is considered that the proposed design would cause some limited harm to the quality of the setting of the Grade II listed Equitable House as a mid-rise, local landmark of the square, however overall would not affect its significance, with the proposed development sitting comfortably between Maritime House and the Equitable House and visible skyline on both sides of the tallest elements and separating all three towers. As above, this harm should be considered in the context of

the overall benefits of the scheme and the need to optimise a site's potential, including maximising affordable housing provision, which it is considered the proposal does.

- 14.43 The proposed development would be glimpsed from the Barrack Field (View 27) but would not as be visible from the rest of Woolwich Common Conservation Area considering its distance from the site and is unlikely to be seen from much of industrial estate due to the existing buildings between. In addition, within the residential areas around the town centre, where the proposal is visible, it would sit comfortably within the town centre context, visible variously within the context of the riverside towers and the taller elements of the Royal Arsenal development.
- 14.44 As set out above, the proposal would introduce a substantial amount of built form onto this town centre site and should therefore respond to the local and emerging character of the area whilst optimising the site's potential, and in this regard, it is noted that the Royal Greenwich Local Plan identifies Woolwich Town Centre as potentially appropriate for tall buildings. The draft Site Allocations DPD further identifies that taller elements may be acceptable where these are set back behind the street frontage, subject to an assessment of impacts on heritage assets.
- 14.45 It is considered that the overall design strategy and rationale is appropriate, seeking to increase the scale of development along Beresford Street by stepping up gradually from the predominant heights around Beresford Square, whilst allowing for a variation in height between blocks to break up the massing. This variation in height further allows the expressive architecture to be appreciated from various angles whilst assisting in wayfinding to some degree.
- 14.46 Moreover, it is recognised that the scheme incorporates perceivable breaks between tall buildings which provide more variation at higher levels and each of the taller blocks transitions into lower setbacks, to allow a more considered massing with increased architectural interest. This is evidenced by Block A which has been located parallel to Macbean Street and is split across three massing blocks, to break it up and make it appear less bulky.
- 14.47 Block B is the most striking building for this development, as it reads as the tallest and most prominent block and is evenly spaced between Blocks A and C to act as a focal point for the proposal. In addition, whilst the proposal has a generally regular and geometric form, through the use of setbacks, curved corner facades and varied materiality with defined sections, the proposal appears as an acceptable composition of height and scale.

- 14.48 It is of relevance that the draft Site Allocations DPD outlines that site W3 (the site facing Bunton Street) to the north is scheduled for redevelopment, and together these proposals should reinforce the Beresford Street corridor and should generally seek a transition in height in a legible way from the taller scale of the riverfront to the lower scale of the historic town centre.
- 14.49 At 22 storeys, the proposed development would be of a similar scale to the tallest elements of the Royal Arsenal, with heights increasing away from the generally lower-rise built form of Powis Street, thereby supporting the Beresford Street corridor approach. It should be noted, however, that the proposal does not fully comply with the preferred approach as set out in the draft Site Allocations DPD, which envisaged a lower-scale, more transitional development, and whilst the proposal is considered broadly acceptable in design terms, the scheme would have some negative impact on local views, specifically approaching from the west on Beresford Street at the junction of Macbean Street and Powis Street (View 15 and 21 in the TVIHA respectively), where the proposal sits less comfortably within its context and the massing can appear dominating.
- 14.50 In addition, both Historic England and the council's conservation officer have identified harm to heritage assets and recommend a reduction in height beyond the reductions in scale that took place in May 2020 and November 2020. This harm is considered to be less than substantial, however still carries significant weight in the planning balance and should be carefully considered against the benefits of the proposal.
- 14.51 Taking the above into account, it is considered that the proposed development is broadly acceptable on design grounds, although would give rise to some harm to heritage assets, and when taken together with other considerations is considered to represent a design solution which makes the most efficient use of the land.
- 14.52 Having regard to the council's statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is considered that the proposal amounts to less than substantial harm to heritage assets and the public benefits of the scheme outweigh the harm, which as discussed above and below are considered to be the provision of affordable housing, the continuation of the supply of housing in general, including a build-to-rent model which increase housing choice generally. Other benefits include the financial contributions related to health, education and transport infrastructure.

### 14.53 **Architecture and Materials**

- 14.54 Owing to the site's sensitive location between two Conservation Areas, and its future role as part of a grouping of tall buildings on Beresford Street, it is important to ensure that the proposal blends well with existing and future developments whilst maintaining a sense of identity to create a sense of place.
- 14.55 Moreover, Policy D9 of the London Plan highlights the importance of high-quality architecture for tall buildings to lessen their impact on an area's character, paying particular attention to the design of the top, middle and base of the buildings as three distinct, but complementary sections to address how the building is perceived from long, mid and short range views respectively.
- 14.56 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.
- 14.57 The proposal includes a well-defined podium defining the ground to third floors, which wraps around blocks A, B and C, providing an active frontage and pedestrian interaction at streetscene level. The floorspace behind this podium includes the internal residential amenity area, flexible commercial space and ancillary spaces and is articulated with double-height windows at ground floor level, thereby providing an appealing interface.
- 14.58 It is considered that there is also good proportionality to the façade treatment, with a clearly defined base, middle and top, providing a more expressive elevation towards Beresford Street. Blocks A, B and C, whilst all connected, have distinct appearances which all have a vertical emphasis, which becomes more pronounced as the height of the building increases. In combination with the even spacing of horizontal banding, which ensures the combination of buildings are appreciated together, it is considered that the proposal has as an attractive and well-balanced façade, providing visual relief to the tall buildings. The facade is further broken down, by the introduction of inset balconies starting at Level 10 and this provides a lighter feel to the building, as its silhouette becomes sleeker as it gains height.
- 14.59 The ground and first floor façades of Block D are a combination of glazed brick and white glazed terracotta, noting that the treatment of the massing and façade are different between the ground and the floors above. In addition, a series of columns adjacent to the public realm enhance this verticality and

create a connection between the first two floors and the residential storeys above. To ensure the proportions match with the adjacent buildings (Block C) the facade changes from spandrel panels to brick, ensuring all buildings appear cohesive.

14.60 Active frontages are delivered by appropriate town centre uses and workspaces at ground floors and complement the opportunity for businesses on Powis Street and support its role as the retail core of the town centre, while activating the through routes and Macbean Street.

14.61 Materiality is consistent with the wider approach for Woolwich through the use of warmer brick tones and the variety of brick tone is considered an appropriate blend which would complement the palette of materials in the area. The ground floor treatment with darker glazed bricks provides a stark contrast with the residential floors above and activates the frontage at eye level.

## 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.
- 15.4 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.
- 15.5 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. A condition requiring the submission of a fire statement and safety strategy have been recommended.

- 15.6 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'.
- 15.7 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.
- 15.8 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.
- 15.9 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.

#### 15.10 Space Standards

- 15.11 The proposed development comprises 595 flats, and it would be expected that all new units meet the minimum space standards as set out in Policy D6 of the London Plan. The number of each unit type and their space requirements are set out below:
- 164 one-bedroom / one-person (studio) units (37-39 m<sup>2</sup>)
  - 199 one-bedroom / two-person units (50 m<sup>2</sup>)
  - 68 two-bedroom / three-person units (61 m<sup>2</sup>)



- 134 two-bedroom / four-person units (70 m<sup>2</sup>)
- 8 three-bedroom / five-person units (86 m<sup>2</sup>)
- 12 three-bedroom / six-person units (95 m<sup>2</sup>)
- 10 four-bedroom / six-person units (99 m<sup>2</sup>)

15.12 Generally, additional floorspace is required to allow units to achieve higher standards of accessibility, in accordance with Policy D7 of the London Plan which requires 10% of all new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings').

15.13 All proposed units would meet or exceed the minimum space standards as set out by Policy D6, and additional space has been allowed for 10% of the proposed dwellings.

15.14 Daylight / Sunlight;

15.15 The ES (and addendums) 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. Following a review of the ES, it is considered that the correct assessment methodology has been used to quantify daylight and sunlight conditions within the Proposed Development.

15.16 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.

15.17 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. For the purposes of this assessment, comparisons against both the 1.5% and 2% ADF target have been used.

15.18 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.

- 15.19 The proposed blocks variously include recessed winter gardens, inset balconies, projecting balconies and external private terraces. The type of private amenity space provided for each unit is dependent on the need to optimise daylight and sunlight whilst reducing the impact of poor air quality and noise from Beresford Street. This result in a relatively high percentage of winter gardens, equal to 59% of the proposed units (351 units), generally used for units at lower levels (up to level 8). As such, an important aspect to consider when calculating ADF for units with winter gardens is the impact of the amenity space being within the external curtain of the main building, and the impact of the glazing separating the internal habitable rooms from the winter garden, both of which have the potential to inhibit diffuse light penetration.
- 15.20 It should be noted however, that the use of winter gardens also allows for the creation of a more versatile amenity space for future occupiers, which allows for year-round use by providing the same amount of amenity space a projecting balcony would provide, but within the outer envelope of the building. This space is separated from the interior areas, by employing a glass screen which can be kept closed on cold, rainy days or opened up during the summer months.
- 15.21 The revised daylight analysis includes a 0.90 frame factor for all units with winter gardens, and assesses all units based on predicted layouts, demonstrating each rooms ADF score against the 2% and the 1.5% target for LKDs, and the 1% target for bedrooms.
- 15.22 When applying the projected cumulative scenario, based on existing and consented developments, and using a 1.5% target for LKDs (with each unit containing one LKD), 90% of LKDs pass (90%, 94%, 78%, 95% and 95% for Blocks A, B, C, D and E respectively). When using the 2% target for LKDs, this falls sharply to 69% passing (59%, 78%, 60%, 81% and 78% for Blocks A, B, C, D and E respectively). Of the 751 bedrooms assessed, 738 passed, equivalent to 98%.
- 15.23 In light of the high-density nature of the proposal, and the need to optimise the site, it is considered that a target of 1.5% ADF for LKDs is appropriate in this instance and reflects the town centre urban location of the development

site. When using the 1.5% target for LKDs and the 1% target for bedrooms, site wide compliance is at 94% which is considered generally good, and overall it is considered that the proposed development would achieve good levels of daylight.

15.24 The results of the sunlight assessment are considered to be correctly stated and demonstrate that 70% of rooms with at least 1 south facing window would meet the recommended BRE guidelines in both the proposed and cumulative conditions. When considering all rooms, 39% would achieve at least 25% APSH in the proposed condition, and 38% in the cumulative scenario. Where rooms do not meet the guidelines, they predominantly have windows facing within 90° of due north. The overall compliance represents a reduction from the 2019 ES rate of 53% as more units are now orientated in a northerly direction. The review of the ES concluded that the results of the overshadowing assessment are considered to be correctly stated and demonstrate compliance with the BRE guidelines.

15.25 Noise, Air Quality and Land contamination.

15.26 An acoustic survey was carried out at the site to assess existing noise conditions within the site, facing Beresford Street and facing Macbean Street. The survey concluded that during the day-time, sound levels ranged between 53 dB(A) and 75 dB(A) across the site, primarily derived by vehicular traffic on Beresford street.

15.27 For the locations near Beresford street, it was observed that during the night-time the average ambient sound levels to the north of the site drop by 2-3 dB with maximum events typically ranging between 69 and 79 dB<sub>LA Fmax</sub>, which is typical for locations near busy roads. The south of the site is exposed to lower levels of noise due to the distance and screening from Beresford street with the ambient sound levels to the south of the site during night-time 6-7 dB lower with maximum events typically ranging between 54 and 63 dB<sub>LA Fmax</sub>.

15.28 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 <sub>LAeq, 16 hour</sub>	-
Dining	Dining Room	40 dB <sub>LAeq, 16 hour</sub>	-
Sleeping (daytime resting)	Bedroom	35 dB <sub>LAeq, 16 hour</sub>	30 dB <sub>LAeq, 8 hour</sub>

- 15.29 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 limits.
- 15.30 The sound reduction requirements for the windows for the facades overlooking Beresford street and Macbean street are high and will require high-performance double-glazed systems. For the facades overlooking Beresford street, double-glazed units with acoustic laminated glass will be required to meet the requirements. The sound insulation performance stated should be achieved by the window system as a whole. The sound levels incident on Block E and other facades to the south of the site are much lower due to distance and screening from the nearby roads. The sound reduction requirements for the windows here are lower and can be achieved with standard double-glazing systems.
- 15.31 The proposed blocks variously include recessed winter gardens, inset balconies and projecting balconies, external private terraces and communal rooftop terraces. Private amenity space is dependent on the need to optimise daylight and sunlight whilst reducing the impact of poor air quality and noise from Beresford Street, with the noisiest conditions at lower levels, when facing towards Beresford Street with little or no screening. The Noise Impact Assessment (NIA) submitted in support of the application outlines that whilst the site is unavoidably subject to noise around its boundaries due to existing busy roads, the design does propose the provision of quieter outdoor communal areas.
- 15.32 This includes roof terraces located away from Beresford street towards the south of the site or at the higher levels of Blocks A, B, C and D which benefit from reduced sound levels at approximately 55 dB. For apartments given direct access to outdoor space which faces Beresford street, the design proposes a combination of measures to offer practicable mitigation of noise. Apartment balconies exposed to more than 70 dB LAeq would be provided with winter gardens. Other apartments on Beresford street, which are exposed to levels less than 70 dB LAeq are to be provided with recessed balconies with a view to achieving increased screening from noise. As noted above, the majority of the balconies are located on the southern, eastern and western facades of the development, away from the noisier main road. Accounting for the increased distance from the roads and screening effect from the balcony structure, it is expected that the sound levels on these balconies would be in the order of 55-65 dB LAeq, with the majority of the balconies achieving 60 dB LAeq or lower.

- 15.33 Overall, subject to high levels of mitigation being secured as set out in the Noise Impact Assessment for both internal insulation (walls), external insulation (windows) and other measures as appropriate to ensure private amenity areas are sufficiently protected from high levels of noise, the proposal is considered to provide an acceptable sound environment for future occupiers.
- 15.34 Amenity Space and Play Space:
- 15.35 The proposed blocks variously include private recessed winter gardens, inset balconies and projecting balconies, external private terraces and communal rooftop terraces. Private amenity space is dependent on the need to optimise daylight and sunlight whilst reducing the impact of poor air quality and noise from Beresford Street.
- 15.36 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. 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. The Housing SPG further sets out that where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement, but that enclosing balconies as glazed, ventilated winter gardens can be considered an acceptable alternative to open balconies and is recommended for all dwellings exposed to high levels of noise. Winter gardens must have a drained floor and must be thermally separated from the interior.
- 15.37 The majority of units up to level 8 will have winter gardens, which are considered an acceptable design solution given the environmental constraints of the site (noise and air quality), which are most acute affecting the north-eastern and north-western elevations (facing Beresford Street and Macbean Street).
- 15.38 Above level 8, units above will have either a projecting or recessed balcony as the effects of noise and air quality are less pronounced and will ensure that the number of units with private outdoor space is maximised. All balconies and winter gardens exceed the minimum space requirements and have been designed to have a functional layout which would support an acceptable standard of accommodation.

- 15.39 Communal roof terraces are also provided for all residents of the proposal, totalling 2150 m<sup>2</sup>. This is considered to offer a high level of amenity for future residents and would provide easy, convenient access to a well-landscape outdoor area within a busy town centre location.
- 15.40 As such, having regard to the noise, air quality and daylight constraints discussed above, it is considered that the type, size and distribution of private amenity space is acceptable.
- 15.41 There is a requirement of 910 m<sup>2</sup> play space to serve the 91 children aged 0-17 projected to reside within the proposed development and the scheme makes provision for 1067 m<sup>2</sup> distributed relatively evenly across the site, in the form of rooftop amenity areas, and a dedicated swimming pool at podium level.
- 15.42 In detail, the requirements for the development are 500 m<sup>2</sup> for children aged 0-4, 320 m<sup>2</sup> for children aged 5-11 and 100 m<sup>2</sup> for children aged 12+, with the proposal incorporating 528 m<sup>2</sup>, 367 m<sup>2</sup>, 172 m<sup>2</sup> for each age group respectively, meeting and exceeding the targets set in the London Plan.
- 15.43 Full details of the proposed play space would be secured by condition, including specifications for play equipment and details of how this would support community cohesion.
- 15.44 Aspect, Outlook and Privacy:
- 15.45 The proposed development has a layout which supports its role as a connection between the town centre and the Royal Arsenal, whilst also reinforcing the principal corridor and building line of Beresford Street, with a generally rectilinear pattern of buildings. This layout allows for relatively open views from all buildings, and the gaps between the different blocks reflects their height and prominence, with gaps of at least 18.0 metres between facing windows maintained site-wide.
- 15.46 The proposed development would comprise of approximately half dual-aspect dwellings (50.8%), with the remainder being single aspect. As set out above, the London Plan seeks to maximise the provision of dual-aspect dwellings, to ensure that dwellings provide a pleasant environment with high standards of amenity. As set out above, it is considered that proposal achieves generally good levels of daylight and sunlight, consistent with a proposal in a town centre setting, meets the minimum space standards, and achieves appropriate levels of internal noise conditions. It is further noted that revisions to the scheme have sought to maximise the provision of dual aspect homes where possible, by reducing the corridor lengths and improving the circulation

environment, including subdivision of the cores in Block A so that they are shorter and open ended, allowing natural light into the circulation areas.

15.47 Inclusive Design;

15.48 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, and these units are spread relatively evenly across the site as one-, two- and three-bedroom apartments.

15.49 All cores are serviced by at least two lifts designed to correct standards, to suit wheelchair users in accordance with Standards 15 and 16 of the Mayor's Housing SPG and each corridor would be 1.5 metres wide which exceeds the minimum requirement of 1.2m for general housing provision. Some concern, however, is raised in respect of the number of units per core, which Standard 12 of the Mayor's Housing SPG advises 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.

15.50 The proposal includes 7 cores, located in Blocks A1, A2, B1, B2, C, D and E, however it should be noted that cores B1 and B2 serve the same corridor and core B2 does not contain an elevator.

15.51 Core A1, which serves 6 units per core, has two lifts and includes south-facing windows across levels 2-8 and north-facing windows across floors 11-18 and Core E, an 'X' shaped core which serves a maximum of 7 units per core, has 2 lifts, and receives direct light from a south west and north east facing window are considered to be fully compliant with the recommendations of the Mayor's SPG.

15.52 However, Core B (comprised of Cores B1 and B2) together form a 'T' shape corridor which serves an average of 13 units per core up to level 9, and an average of 7 units per core for floors 15-22 with a maximum of 9 units per core at levels 10-14. Core B benefits from 2 lifts, however both are located within Core B1 and Core B2 only comprises stairs. Each corridor on levels 2-10 and 15-21 receive direct light from a south west facing window into the courtyard.

15.53 Similarly, Core C is 'L' shaped and serves up to 12 units per core at levels 2-8, but with an average of 9 units per core across Block C. Due to the 'L' shaped corridor at levels 2-8 the units are split to six units either side of the 'kink' where the 2 lifts are located, which in some ways results in one lift serving 6 units to the north of the kink and one lift serving 6 units to the south of the kink. Core C would serve approximately 21 occupants, which is broadly consistent with the targets of the Mayor's SPG and each corridor on levels 2-11 would receive direct light from a south west facing window into the courtyard, whereas on levels 9-15 the corridor receives natural light from a north east facing window onto the communal terrace.

15.54 Core D is 'T' shaped and serves up to a maximum of 11 units per core at levels 2-6, with an average across all floors of 9 units per core. The core is served by two lifts, for approximately 22 occupants, and would receive direct light from a west facing window located in the middle of the longest corridor and a south west-facing window.

15.55 Taking the above into account, it is considered that the proposal results in some conflict with Standard 12 of the Mayor's Housing SPG, and the design and length of some corridors, particularly Cores B and C is not desirable. It is noted however, that revisions to the scheme have resulted in significant improvements and the proposed corridors would offer relatively good access to natural light, as well as a pleasant outlook, with appropriate corridor widths. It is further recognised that the provision of two lifts to serve each core would provide high levels of accessibility exceeding the minimum requirements and where cores do serve more than 8 units, they have been designed to include corners to reduce the perception of their length.

15.56 As such, whilst not the most desirable aspect of the proposal, it is considered that the accessibility of the residential units is overall acceptable.

15.57 In addition, the Blue Badge holders parking is provided in a covered parking garage with direct access to the residents' amenity spaces and residential cores in accordance with Standard 9 of the Mayor's Housing SPG. Moreover, all communal entrance lobbies are visible from streetscene level, clearly identifiable as entrances to residential cores and are directly accessible from the public realm in accordance with Standard 8 of the Mayor's Housing SPG.

15.58 Secured by Design;

15.59 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 Daylight, Sunlight and Overshadowing

16.6 The Environmental Statement (and addendums) set out that a loss of light has been assessed based on the retained ratio of Vertical Sky Component (VSC), Daylight Distribution (DD) or Annual Probable Sunlight Hours (APSH).

16.7 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 be negligible 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%.

16.8 Daylight Distribution (DD) (sometimes referred to as No-Sky Line) 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 the development, the area of the working plane that can receive direct skylight is less than 0.8 times its former value.

16.9 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.

16.10 The ES and addendums have been reviewed by the council's independent reviewers, who have confirmed that the potential effects on neighbouring receptors are considered to be appropriately stated, accepting the

clarification requests for the assessment of significance for the Royal Arsenal Hotel and 66 Powis Street which have subsequently been amended.

16.11 The ES includes a full assessment of relevant buildings and spaces, including properties on Powis Street, Macbean Street, Beresford Square, Murray's Yard and Beresford Street and amenity areas including Maribor Park and Dial Arch Square. The proposal has accounted for the later phases of the Royal Arsenal masterplan and have shown consented developments within their assessment forming the basis of the cumulative scenario. These plots have been considered in the overshadowing assessment with limited harm however as detailed layouts are not know, and recognising the distances between plots is reasonable, no significant adverse impact is expected to future or consented development. The ES concludes that the proposal would have a minor, moderate or major adverse impact on the following properties, with all other properties and spaces assessed experiencing a negligible impact:

- Royal Arsenal Hotel (major)
- Royal Sovereign House (minor)
- The Macbean Centre (moderate)
- 41 Macbean Street (major)
- 44 Macbean Street (major)
- Garratt House (minor)
- 22-24 Powis Street (moderate)
- 26-28 Powis Street (minor)
- 40-42 Powis Street (major)
- 66 Powis Street (minor)
- 2 Murray's Yard (major)
- 3 Murray's Yard (moderate)

#### 16.12 Royal Arsenal Hotel

16.13 This hotel is located to the north of the development on Beresford Street. Planning permission was granted in March 2011 (Ref: 10/3288/F) and the hotel was completed in 2017. The proposed development would result in significant reductions to daylight access for users of the hotel with 92% of the windows tested failing to meet the BRE guidelines for VSC for residential units. Approximately half of the bedrooms within the hotel would further breach the guidelines for daylight distribution and 93% would fail the APSH test.

16.14 It should first be noted that the planning system does not set standards of accommodation for hotel uses, and as such, the BRE guides for residential uses cannot be applied mechanistically. Nonetheless, the proposed development would clearly result in a significant loss of light to the bedrooms within the existing hotel, both in terms of direct sunlight and daylight access.

16.15 However, the significance of the loss of access to light for the hotel use is not considered to warrant a reason for refusal, as any development of the site would likely result in significant losses compared to existing conditions, given the empty nature of the site which is not reflective of an urban town centre location.

16.16 On balance, whilst it is noted that the proposal would have a significant adverse impact on natural light to this building, this is afforded little weight in the planning balance.

#### 16.17 Royal Sovereign House

16.18 This former office building is located to the north of the proposed development on the corner of Macbean Street and Beresford Street. Planning permission was granted in July 2017 (Ref: 15/0016/F) for the change of use and extension of the building for residential use (and subsequently amended through permission reference 19/0211/MA).

16.19 45 of the 55 windows assessed (82%) would meet the BRE guidelines for the VSC test. Of the remaining ten windows, seven serve LKDs (high sensitivity receptors) which are all served by at least one other window that is unaffected by the proposal, and the overall harm to these rooms is therefore reduced. The remaining three windows serve bedrooms (low sensitivity receptors) and will retain at least 21% VSC.

16.20 The results of daylight distribution show that all of the LKDs assessed will comply with the BRE guidelines. Three bedrooms that breach the guidelines retain direct skylight to between 69% and 73% of their areas, compared to the 80% recommendation, whilst the APSH results show that all of the windows oriented within 90-degrees of south will comply with the BRE Report guidelines for sunlight amenity.

16.21 This is considered to result in a minor adverse impact on the affected residents, and in the context of this urban town centre location is considered acceptable.

#### 16.22 The Macbean Centre

16.23 The Macbean Centre is a single-storey community hall located to the south of the proposed development and it has been assumed that the windows either one large, or two smaller, function rooms. Daylight and sunlight amenity to this community hall is considered less important than daylight and sunlight amenity to residential properties, however, as the occupants have a

reasonable expectation of natural light, the windows have been assessed in accordance with the BRE Report guidelines.

16.24 VSC analysis shows that four of the ten windows assessed would exceed the BRE guidelines. These four windows are located to the north side of the building and VSC is reduced from between 32.99% and 35.62% to between 10.22% and 12.31%. Whilst these losses are major adverse, the remaining six windows, which comply with the BRE guidelines, are understood to serve the same function rooms, meaning the light distributed throughout the rooms is unlikely to experience major adverse impacts. The six windows orientated within 90-degrees of due south will fully comply with the BRE guidelines retaining high levels of sunlight amenity.

16.25 As such, whilst the impact to some windows within the Macbean Centre are significant, the impact on the hall overall is considered acceptable.

#### 16.26 41 Macbean Street

16.27 This property is located to the south-west of the proposed development and VOA records show that it contains two flats; one at ground floor and one over the upper floors, both with windows facing northwards directly at the proposed development site. Due to the cleared nature of the site, the windows within these units currently have largely unobstructed access to light, with 6 of the 7 windows receiving between 34% and 36% VSC. The remaining window receives 24.77% VSC.

16.28 VSC analysis shows that the window serving the ground floor reception room would be reduced to 11.60% VSC, retaining 0.33 times the existing VSC and therefore the impact to this window is considered major adverse. The first-floor windows would be reduced to between 8.67% and 23.87% VSC, and the large percentage reductions mean that the effect to these windows is also considered major adverse. The two second floor windows would be reduced to 14.17% and 16.93% VSC respectively.

16.29 Two windows are orientated within 90-degrees of due south. The APSH to first floor window would be reduced from 38% to 22% compared to the 25% guidance figure and the WPSH would be reduced to 3% compared to the 5% guideline figure.

16.30 The impacts to these two units in terms of loss of light is therefore considered to be significant, notwithstanding the site's cleared nature and recognising that any development which optimises the site is likely to have some negative impact.

#### 16.31 44 Macbean Street

16.32 This property is located to the south-west of the proposed development and VOA records show that this building contains two flats, one at first floor and the other at second.

16.33 The two windows serving this property orientated in an easterly direction are likely to serve habitable rooms, and these would retain 24.78% and 26.96% VSC respectively, retaining 0.74 and 0.76 times the VSC in the Baseline Scenario. The effect to daylight amenity to these windows is therefore considered to be minor adverse.

16.34 The windows on the north elevation are likely to serve bathrooms however have been included in our analysis as their function is not certain. These windows would be reduced to between 7.43% and 13.91%, representing retained values of between 0.37 and 0.52 times existing conditions and the losses to these windows are therefore major adverse. However, the APSH results to the three windows orientated in a southerly direction would be meet the guidance in the BRE guidelines and overall it is considered that acceptable access to light would be retained.

#### 16.35 Garratt House

16.36 This property is located to the south-west of the proposed development and VOA records indicate that it contains sixteen flats. VSC analysis shows that 20 of the 22 windows tested will comply with the BRE guidelines. The two windows exceeding the guidelines are located on first floor and are understood to serve two multi-aspect rooms. These two windows retain 0.76 and 0.78 times the VSC, compared to the 0.80 recommendation. In terms of sunlight amenity, nine windows are orientated within 90-degrees of south and all would comply with the BRE guidelines.

16.37 As such, whilst there would be a loss of access to natural light, this is considered to be acceptable in this instance and would not result in significantly worsened living conditions for the future occupiers of Garratt House.

#### 16.38 22-24 Powis Street

16.39 This property is located to the south-east of the proposed development and VOA records show five flats at the address. None of the windows facing the proposed development are orientated within 90-degrees of south and therefore an assessment of daylight distribution is not necessary.

16.40 VSC analysis shows that four of the seven windows will comply with the BRE guidelines, retaining in excess of 27% VSC. The three windows breaching the guidelines retain between 16.36% and 24.53% VSC which represents between 0.55 and 0.66 times the existing VSC.

16.41 Whilst the retained VSC figures are commensurate with an urban environment, due to the ratio reductions, the overall effect on access to daylight is considered moderately adverse and the harm to some units would be significant.

#### 16.42 26-28 Powis Street

16.43 This property is located to the south of the proposed development and contains flats on the first and second floors. As with the other properties to the south of the development, none of the windows facing the scheme are orientated within 90-degrees of due south and therefore an assessment of daylight distribution is not necessary.

16.44 The results show that four of the eight windows tested will comply with the BRE guidelines for VSC. Of the four windows that do not meet the guidance, two serve an LKD, and these windows will retain 0.77 times the VSC of existing conditions, compared to the 0.80 guideline figure which is considered acceptable in this instance.

16.45 Four of the six rooms assessed will comply with the criteria for daylight distribution, including the LKD. The two rooms that do not meet the guidelines are bedrooms (low sensitivity receptors) and retain access to direct skylight to 63% and 64% of their room areas, compared to the 80% recommendation. Considering the VSC and daylight distribution results and retained values, the overall impact on these properties is not considered significant.

#### 16.46 40-42 Powis Street

16.47 This property is located to the south of the proposed development and VOA research shows that it contains four flats. The windows serving dual-aspect rooms and serving single aspect rooms appear to serve bedrooms. The VSC results show that four of the ten windows tested will comply with the BRE guidelines. The six windows which do not meet the guidelines serve four rooms and at least one window to each of these rooms will retain a VSC of between 14.32% and 19.09%.

16.48 Whilst the retained VSC figures are commensurate with an urban environment, due to the reductions, the overall effect on access to daylight is considered major adverse and the harm to some units would be significant.

16.49 66 Powis Street

16.50 The results in the 2019 ES showed that one window would not meet the guidelines for VSC but that the room would comply with the guidelines using the daylight distribution test. The 2019 ES identified a minor adverse effect to daylight amenity to this property. A review of the history for these units show that the first and second floors were converted without permission and subsequently received a certificate of lawful use on the 8<sup>th</sup> May 2018 for a studio unit and a 1-bedroom unit. Given that the affected windows within each flat serve kitchens within dual-aspect units, and separation distances between the window and the proposed building would exceed 20 metres, it is considered that the impact to these properties would be acceptable.

16.51 2 Murray's Yard

16.52 This property is located to the south of the proposed development and the windows facing the site are orientated in a northerly direction. Based on an external inspection, the seven windows analysed have been assumed to serve habitable rooms.

16.53 Currently, six of the windows receive between 34.47% and 38.29% VSC which consist of very open aspects and almost fully unobstructed access to light. The VSC results show that all seven windows tested would exceed the BRE guidelines with retained VSCs between 14.12% and 17.84% at first floor and between 20.15% and 20.36% at second floor level. Consequently, the effects on daylight amenity to this property is considered major adverse.

16.54 Whilst the retained VSC figures are commensurate with an urban environment, due to the reductions, the overall effect on access to daylight is considered major adverse and the harm to some units would be significant.

16.55 3 Murray's Yard

16.56 This property is located to the south of the proposed development. The six windows tested were noted as likely to serve two LKDs however this could not be confirmed. Three of the six windows tested would comply with the BRE guidelines for VSC. Of the three windows transgressing the BRE guidelines, two serve the first floor LKD and one serves the first floor LKD.



- 16.57 At second floor level, two windows will retain VSC figures of 26.26% and 27.66%. The first-floor windows would retain 10.03%, 18.35% and 20.59% respectively. The APSH results show that all four windows orientated within 90-degrees of south would comply with the BRE Report guidelines.
- 16.58 As such, whilst there would be some harm relating to a loss of access to natural light for this building, the proposal would not result in significant harm.
- 16.59 Privacy and Outlook
- 16.60 The proposed development, by reason of its size, the proposed residential uses and siting within a town centre location mean that the proposal will reduce the outlook of a number of residential properties surrounding the site, including most significantly, the properties on the northern side of Powis Street, properties on Macbean Street, Murray's Yard and the Royal Arsenal Hotel.
- 16.61 Owing to the cleared nature of the development site and having regard to Policy D3 of the London Plan and the draft Site Allocations DPD, it is recognised that there would be some loss of aspect for nearby properties as a result of any comprehensive redevelopment of the site, particularly southern aspects from Royal Sovereign House and northern aspects from the properties on Powis Street and therefore the weight attributed to this is lessened.
- 16.62 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.
- 16.63 Distances between facing windows are generally good, generally dictated by existing street patterns and the need to create a high-quality public realm. In this regard it is noted that separation distances usually exceed 18 metres, and in any event are considered to reflect the fairly fine urban grain of Woolwich town centre.
- 16.64 The proposed blocks variously include recessed winter gardens, inset balconies and projecting balconies, external private terraces and communal rooftop terraces. Private amenity space is dependent on the need to optimise

daylight and sunlight whilst reducing the impact of poor air quality and noise from Beresford Street.

16.65 It is considered that the proposal would not result in a significant loss of privacy of nearby properties, owing to the well-positioned rooftop terraces, which largely overlook the new public space within the development and Beresford Street, and sufficient distances between building which respect the existing street patterns and reinforce the established building lines.

## **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 Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	All	Car free~
Inner London PTAL 3	All	Up to 0.25 spaces per dwelling
Inner London PTAL 2 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 seeks permission for 595 flats and approximately 2000 m<sup>2</sup> of commercial floorspace, and falls within an area with a Public Transport Accessibility Level (PTAL) of 6a-6b, where 0 is the worst and 6b is the best. This high PTAL is representative of the site's town centre location, in close proximity to numerous bus routes going east, south and west, as well as the Woolwich Arsenal DLR and Train Stations, and the Crossrail Station under construction.
- 17.16 The Site also lies within Woolwich Arsenal (WA) Controlled Parking Zone (CPZ) which provides a mixture of parking conditions and is operational between the hours of 08:30-18:30 (Monday to Saturday). Furthermore, within 400m of the Site there are three public car parks, all of which are pay and display. These are situated on Powis Street, Monk Street and Calderwood Street and can accommodate 68, 41 and 445 spaces respectively.
- 17.17 Owing to the site's location and high PTAL, it is therefore expected that the proposal be car-free for both residential and commercial elements, providing disabled person parking spaces only, and as necessary for servicing and deliveries. Consequently, 18 disabled persons parking spaces are proposed (equating to a 0.03 ratio) for the residential elements and 1 is proposed for the commercial elements. In addition, 3 van bays and 2 informal large delivery bays are proposed for deliveries and servicing.
- 17.18 This is considered to be an appropriate level of parking, consistent with the objectives of the London Plan and the Royal Greenwich Local Plan which both support high-density developments in locations with high PTALs to be car-free, subject to an assessment of local transport capacity, cycle space provision and other mitigation measures as required.

- 17.19 The ES and addendums identify through their travel assessment the impact of the proposal on users of the transport networks and these include pedestrians, cyclists, train / DLR / Crossrail passengers and bus passengers.
- 17.20 The ES predicts that as a result of the development, the additional demand on local transport infrastructure would result in an AM peak of 490 additional movements and a PM peak of 358 additional movements compared to existing circumstances. Of these additional movements, it is expected that approximately 50% would use train, DLR or Crossrail services (50.2% and 49.4% for AM and PM peaks respectively), approximately 25% would use bus services (25.7% and 25.4% for AM and PM peaks respectively), 13.1 % would travel by foot, and 2% would travel by bicycle, with the remainder using private vehicles of some form.
- 17.21 Considering the number of bus routes (five in total) and number of bus services (33 during the AM and the PM peak hours) that operate within the vicinity of the Site, when distributed over these services, the impact equates to roughly four additional passengers per service during the AM peak hour and three additional passengers per service during the PM peak hour. This would not result in a significant impact on local bus services.
- 17.22 The council's highways and transport officer, and TfL, have both confirmed that there appears to be sufficient capacity within the rail and bus network to accommodate the proposed development, and the proposal overall would have a negligible impact on the local highway network in terms of movements to and from the site.
- 17.23 It is noted, however, that the modal share for active travel (specifically bicycle use) is relatively low and should be encouraged through the use of a Travel Plan. In this regard it is recognised that the proposal promotes active travel through the high number of cycle spaces proposed (954) and the low number of car parking spaces, which will gradually result in a passive modal shift to some extent.
- 17.24 In addition, financial contributions have been agreed to fund cycling improvements on Beresford Street and a s278 agreement controlling works carried out to the highway includes improvements to the Beresford Street footway, Murray's Yard and Macbean Street in line with the Healthy Streets approach outlined in the London Plan.
- 17.25 As such, based on the above, it is considered that the proposal would not have a significant impact on the surrounding transport and highway network, and would generally comply with the objectives of the London Plan (2021) and the Royal Greenwich Local Plan (2014).

## **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 applicant has submitted a Waste Management Strategy which outlines how the residential and commercial units will operate.
- 18.3 Residential units will include internal waste storage containers to promote the separation of recyclable materials and food waste at source. Residents in Blocks A to D would manually transport their waste from their residential unit to waste chutes on each floor, with refuse, mixed recycling and food waste segregated via the tri-separator waste chute.
- 18.4 It is proposed that the on-site facilities manager (FM) would swap full bins under each waste chute in the ground floor waste chute room in Blocks A to D with empty bins from the central waste store, which is where bins will be stored prior to collection. On waste collection days, the FM team would assist RBG waste operatives with the collection of bins from the central waste store.
- 18.5 It is further proposes that residents in Block E would also manually transport their waste from their residential unit to a waste chute on each floor, however the on-site FM team would swap full bins under each waste chute with empty ones from within the ground floor refuse store. On collection day, waste collection operatives would access the bins in the waste store directly. Sufficient space within each of the waste storage areas has been provided to accommodate at least one week's worth of refuse, mixed recycling and food waste storage capacity. Bin numbers have been quantified using residential waste generation metrics in the Guidance.
- 18.6 It is proposed that each commercial occupier would be required to provide temporary waste storage areas within their units which have sufficient capacity to separately store refuse, recycling, and food waste (where appropriate). The commercial occupier(s) of Blocks A, C, D and E would be responsible for providing sufficient waste storage within their own demise. On collection days, the appointed commercial waste collection contractor will access the bins directly from the temporary waste storage areas within each commercial unit and the market pound.

18.7 The proposal has been reviewed the by the council's waste services team, who have queried several aspects of the proposed collection routine and the number of bins required for the market pound. Notwithstanding this, it has been confirmed that there is sufficient space on-site to meet the requirements of the site, and the remaining details can be secured by way of condition.

## **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 EI 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 The applicant has demonstrated in their Energy Strategy (Rev 04, 12 November 2020) that the residential component of the development will reduce the regulated CO<sub>2</sub> emissions by 57.2%, equivalent to 425 tonnes per year, and the non-residential component by 38%, equivalent to 19 tonnes per year, based on SAP10 carbon emission factors beyond the Part L 2013 Baseline. As such, a site wide CO<sub>2</sub> emissions reduction (regulated) of 56%, equivalent to 444 tonnes per year is predicted beyond Part L 2013 Baseline and the proposal would use measures in accordance with the Mayor's Energy Hierarchy to achieve the below Carbon savings.
- 19.10 Several renewable technologies have been investigated in terms of technical, physical and financial feasibility, with solar PV and ASHPs found to be appropriate for the development. Whilst this is welcomed, technical details of the ASHP and solar PV systems would need to be provided and PV solar panels should be maximised as there is the potential for additional roof space, potentially incorporating biosolar roofs, and the maximisation of PV would be further examined through the use of a detailed condition. In addition, a BREEAM target of Excellent is sought and this would be secured by way of condition.
- 19.11 A number of passive design measures have been considered to reduce the risk of overheating as discussed within Appendices B and C of the Energy Addendum (Rev 04, November 2020), including the GLA Overheating Checklist and results from the dynamic overheating assessment. In particular Appendix C demonstrates that the majority of habitable spaces within the residential component pass the relevant criteria with and without blinds, however several highly glazed south-facing rooms exceed the allowable hours for the maximum comfort temperature and specific mitigation for these rooms would be controlled by a condition. In the context of the scheme as a whole, this is considered acceptable.
- 19.12 In addition, in line with Policy SI 2, the development is expected to calculate the whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions using the Mayor's Whole Lifecycle Carbon Assessment guidance as reference, and details of this would be secured through conditions.
- 19.13 Overall, the proposals are generally considered to comply with London Plan and the Royal Greenwich Local Plan, however neither of the residential or commercial elements meets the zero carbon standard and there are still outstanding issues that need to be fully explored, and the council's sustainability team have advised that these matters can be resolved through the use of detailed conditions and obligations within the s106 agreement.

## **20. Socio-Economic Effects**

- 20.1 Policy S2 of the London Plan (Health and social care facilities) sets out that local authorities, in conjunction with Clinical Commissioning Groups (CCGs) should identify and address local health and social care needs and proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.
- 20.2 The supporting text to Policy S2 further explains that when assessing the need for new health and social care facilities, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all growth. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that new primary and community facilities or capacity will need to be provided and boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed and that mechanisms are in place to secure their provision through either Section 106 or Community Infrastructure Levy contributions.
- 20.3 Policy S3 of the London Plan (Education and childcare facilities) states that development proposals for housing and commercial facilities should incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need, and boroughs should ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice.
- 20.4 Policy CHI of the Royal Greenwich Local Plan (Cohesive Communities) states that all development must include measures that help to create and maintain cohesive communities, that encourage diversity and reduce inequalities between areas. As such, developments are expected to support 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.
- 20.5 The supporting text explains that the demand for primary school places is predicted to continue to increase, particularly in the north of the borough. Whilst proposals are already in place for expansion and rebuilding of a number of existing schools, further future requirements for remodelling, expansion and the provision of new primary schools is likely.
- 20.6 This is backed up by Policy IM1 of the Royal Greenwich Local Plan (Infrastructure), which sets out that all qualifying developments should provide for the infrastructure, facilities, amenities and programmes that are

considered necessary to support and serve the development and offset any harm.

- 20.7 The ES (and addendums) outline that the child yield arising from the proposed development result in demand for an additional 25 early years spaces, 29 primary education places and 9 secondary education places. Given the quantum of development proposed, this is relatively low, and this is largely due to the build-to-rent model, and the relatively low provision of larger homes (3 and 4-beds).
- 20.8 The submitted information has been reviewed as part of the ES review and separately reviewed by the council's school place planning team, who have advised that significant pressure is being placed on primary school places within the Woolwich Area due to relatively high levels of development. It was further advised that there is sufficient capacity for early years places and secondary school places locally. It is noted that the child yield for this development is relatively low, and when considered individually, the proposal would not cause significant impacts to local education provision, however when considered cumulatively with other nearby developments and allocated sites (e.g. Spray Street redevelopment, Woolwich Leisure Centre redevelopment), a significant impact arises and mitigation is required. In this instance, a contribution towards the provision of primary school places of £250,000 has been agreed as appropriate, to be pooled with contributions from other nearby developments, towards the expansion of an existing school in the area for an additional form of entry.
- 20.9 In addition, an assessment of primary healthcare provision has been included in the ES (and addendums), which sets out that the proposal would give rise to a reduced projected population yield of 1090 residents, resulting in an additional 56 additional patients per GP. The CCG have advised that primary health care provision in the area is under pressure as a result of this development, and cumulatively with other developments nearby, and as such, a contribution of £200,000 has been agreed as appropriate and proportional.
- 20.10 It should be noted that the contributions agreed towards education and healthcare provision fall below the amounts requested following consultation, however due to viability constraints, noting the break-even position of the financial viability statement, it has been agreed that seeking higher contributions would result in the proposal being in a financially unviable position, which would inhibit the ability to secure the maximum possible amount of affordable housing. It should be further noted that the Community Infrastructure Levy (Amendment) (England) (No.2) Regulations 2019 were amended on the 1<sup>st</sup> September 2019 to allow the pooling of both CIL and

s106 contributions to fund the same piece of infrastructure and therefore additional funds may be made available once CIL has been accounted for.

## **21. Legal Agreement**

21.1 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).

21.2 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:

- General Housing Provisions
  - All dwellings (except those as identified as affordable housing) are to be held as Build to Rent under a covenant for a minimum of 15 years.
  - All dwellings shall be covenanted under a unified ownership and management of the entire development and if covenant is broken, this would trigger a 'Clawback' review which would result in a payment to the Council in accordance with the (Homes of Londoners) Viability SPG. The covenant periods shall commence from the date of first occupation of any residential unit.
  - Provision of a housing lettings plan, details of which should ensure that longer tenancy agreements (three years or more) are available to all tenants, that break clauses for renters allow the tenant to end the tenancy with a month's notice any time after the first six months, that annual increases to rent should be formula-linked (limited to CPI within tenancies), and that no requests for up-front fees of any kind to tenants or prospective tenants other than deposits and rent-in-advance are made.
  
- Affordable Housing
  - Provision of 119 units (20% by unit) (24.4% by habitable room), with 36 secured at GLA London Living Rent levels and 83 secured at Discount Market Rent levels, secured as affordable housing in perpetuity.
  - Submission of an affordable housing lettings plan, including agreement with the Council regarding the eligibility criteria, which should relate to local circumstances and include locally defined eligibility criteria (with priority for public service key workers, e.g. QE2, Belmarsh Prison). The

- plan shall detail monitoring of any occupants in the London Living Rent units.
- Submission of an affordable housing marketing plan for the discount market rent units.
  - To use reasonable endeavours to keep service charges for LLR tenants to a minimum.
  - Agreement protocol for the Council to advertise to individuals living and/or working in the Borough in the first instance, with the Council given opportunity to nominate tenants for any affordable home, either from its current waiting list or from a future keyworker list within an agreed timeframe.
  - In the event that private rent units are sold (i.e. after the 15 year covenant), sale of the affordable units will only be accepted if it can be fully demonstrated that the units cannot be retained as affordable housing. In such cases the equivalent level of affordable housing and discount should be provided in the vicinity of the site.
  - No occupation of more than 75% of the Open Market Housing Units until all the London Living Rent Units have been completed and available for occupation.
  - Early review mechanism is triggered if the development has not commenced within two years, with all relevant 'pre-commencement' conditions having been discharged;
  - Late review mechanism which is triggered following occupation of 75% of the market units
  - Reviews to be undertaken in accordance with Formula 5 and Formula 6 of the (Homes of Londoners) Viability SPG and the independent reviewer to be paid at the developer's expense.
- Transport
    - £32,000 contribution towards cycling and pedestrian improvements to Beresford Street.
    - £11,900 contribution towards cycle training.
    - A financial contribution towards the funding of an existing car club operator (or provision of a new car club) equal to the cost of annual car club membership for 5 years for each unit.
    - A financial contribution of £3500 to allow the local highways authority to amend the Traffic Order controlling the Woolwich CPZ, preventing future residents and other occupiers of the development (except Blue Badge holders) from acquiring parking permits within the Royal Borough of Greenwich.
    - Financial contribution towards Legible London signage at the site to help residents of the site, employees of the commercial space, and people wanting to access the river, the Royal Arsenal, the town centre

(Powis Street and Beresford Square), and nearby public transport stations.

- A commitment to allow pedestrian access through the site (from Powis Street to Beresford Street) at all times and to maintain this as a free and unobstructed route for pedestrians.
  - To provide a Travel Plan for approval prior to occupation, and at years 1, 3 and 5 post occupation, and to pay a monitoring fee for the Travel Plan's review.
  - To enter into a section 278 agreement to carry out works on-site and surrounding highways including agreeing the details of crossovers, street works and repairs. This is to include as a minimum the upgrades to Murray's Yard (including measures to prevent vehicle access from Powis Street) and the making good of the Beresford Street and Macbean Street footway in line with the Healthy Streets approach.
- Education and Employment Training
    - A financial contribution of £615,070 (to be index linked in line with the RPI index)
    - A commitment to utilise GLLaB for the employment of workers during construction as much as is reasonably practical.
- Market Pound
    - The developer shall provide the market pound area to RBG at a peppercorn rent for the benefit of the market traders in Beresford Square in perpetuity.
- Carbon Offsetting
    - A financial contribution to the Local Authority to account for emissions from the development at rate of £95/tn.
    - Provision for a future connection to an off-site network
    - Renewable / Low Carbon Energy Monitoring
- Education
    - £250,000 contribution towards the funding of additional school places within the local area to serve children living in this development and existing residents.
- Health and Social Care
    - £200,000 contribution towards the funding of additional health facilities in the local area, to be allocated in agreement with the CCG.
    - To prepare a targeted Health Impact Assessment to determine the best allocation of funding in consultation with the CCG.

- Other Obligations
  - Payment of legal costs
  - Payment of s106 monitoring fees

21.3 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.

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

22.1 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.

22.2 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.

## **23. Conclusion and Planning Balance**

23.1 The proposed development would make a significant contribution to the borough's supply of housing, taking advantage of a brownfield site in a town centre location, which is allocated for mixed-use development in the draft Site Allocations DPD and well connected by public transport, providing an important link between the Royal Arsenal and Powis Street. Generally, the proposal achieves good standards of accommodation, however it is noted that Block C does not perform as well as the others in achieving good levels of daylight, but still performs relatively well against BRE guidelines.

23.2 The proposal would not give rise to significant adverse impacts to most surrounding properties, despite its size, although it should be noted that some single-aspect units facing the scheme which currently have nearly unobstructed views would see a significant reduction. Owing to the town centre location and the need to optimise development from brownfield sites, it is likely that any substantive re-development of this allocated site would have similar impacts and as such, this is afforded less weight.



- 23.3 The residential element of the scheme is proposed as a build-to-rent model, and has been shown to have a negative viability position at 35% affordable housing, with the maximum reasonable amount of affordable housing, demonstrated through a Financial Viability Assessment, shown to be 20% by unit (24.4% by habitable room) with a tenure split of 30% at rents equivalent to London Living Rent (LLR) to 70% at a range of discounts. In this regard, it is noted that the viability position demonstrates that the proposal results in a break-even position and that any affordable housing represents an element of risk to the applicant, and the affordable housing offer proposed therefore represents planning gain.
- 23.4 In addition, whilst the objection from Historic England is noted, and notwithstanding the substantial massing, it is considered that the proposed development as whole responds well to the surrounding character in terms of its overall form and massing, and would make a positive contribution to the emerging skyline of Woolwich whilst providing a high quality and engaging ground floor layout which improves local permeability and legibility. In this regard, the scheme would have some negative impact on local views, specifically approaching from the west on Beresford Street at the junction of Macbean Street and Powis Street (View 15 and 21 in the TVIHA respectively), however overall the proposal would amount to less than substantial harm to heritage assets and it is noted that the proposal incorporates high levels of detailing and quality materials which would complement the surrounding built form.
- 23.5 The associated package of obligations includes contributions towards health and education infrastructure, with payments of £200,000 and £250,000 respectively. Financial contribution towards encouraging employment and training opportunities has also been secured, in addition to contributions towards cycling improvements on Beresford Street and the making good and upgrading of footways within the site and on Beresford Street, Macbean Street and Murray's Yard.
- 23.6 These financial contributions have not been included in the financial viability assessment, as they would further weaken the applicants position on affordable housing if includes as an expenditure, and it is considered that any affordable housing offer lower than 20% (by unit) would fail to deliver sufficient planning gain, and would therefore not outweigh than less than substantial harm identified above. However, on balance, it is considered that the maximum affordable housing offer possible has been secured which taken together with the associated payments towards supporting infrastructure, represent significant planning benefits, and the proposal is therefore supported.

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).

Report Author: Andrew Thornley  
Tel No.: 020 8921 5698  
Email: [Andrew.Thornley@royalgreenwich.gov.uk](mailto:Andrew.Thornley@royalgreenwich.gov.uk)

Reporting to: Victoria Geoghegan  
(Assistant Director Planning & Building Control)  
Tel No: 020 8921 4296  
Email: [Victoria.Geoghegan@royalgreenwich.gov.uk](mailto:Victoria.Geoghegan@royalgreenwich.gov.uk)