

VIP Trading Estate and VIP Industrial Estate, Charlton

in the Royal Borough of Greenwich

planning application no. 16/4008/F

Planning application

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 ("the Order").

The proposal

Demolition of existing buildings and erection of 11 buildings ranging from 2 to 10 storeys in height for Class C3 residential use (771 units), with flexible uses comprising Class B1 (Business), Class A1- A3 (Retail / Restaurant), Class D1 (Community) and Class D2 (Leisure) at ground floor and first floor level, alterations to existing vehicular access and creation of new pedestrian access from Anchor and Hope Lane and the riverside, creation of new areas of open space and landscaping together with the provision of associated car parking, cycle spaces, refuse and recycling storage, plant and all other associated works.

The applicant

The applicants are **Leopard Guernsey Anchor Propco Ltd** and the architect is **Simpson Haugh and Partners**.

Recommendation summary

The Mayor of London, acting as Local Planning Authority for the purpose of determining this application,

- i. grants conditional planning permission in respect of application 16/4008/F for the reasons set out in the reasons for approval section below, and subject to the prior completion of a section 106 legal agreement;
- ii. delegates authority to the Assistant Director - Planning or the Executive Director of Development, Enterprise and Environment to issue the planning permission and agree, add, delete or vary, the final detailed wording of the conditions and informatives as required, and authority to negotiate, agree the final wording, and sign and execute, the section 106 legal agreement;

- iii. delegates authority to the Assistant Director – Planning or the Executive Director of Development, Enterprise and Environment to agree any variations to the proposed heads of terms for the section 106 legal agreement;
- iv. delegates authority to the Assistant Director - Planning or Executive Director of Development, Enterprise and Environment to refuse planning permission, if by 29 April 2019 the section 106 legal agreement has not been completed;
- v. notes that approval of details pursuant to conditions imposed on the planning permission would be submitted to, and determined by, Greenwich Council;
- vi. notes that Greenwich Council would be responsible for the enforcement of the conditions attached to the planning permission.

Drawing numbers and documents

Proposed drawings	
Site plans	
10046-A-DRG-Z0-G000-2030-PL-RS Site Location Plan - Proposed Roof A0 1:1000 - C	10046-A-DRG-Z0-G100-0001-PL-RS General Site View Rev C
10046-A-DRG-Z0-G100-0002-PL-RS Navigation Plan Rev C	10046-A-DRG-Z0-G100-2000-PL-RS GA Plan - Site - Ground Floor Rev E
10046-A-DRG-Z0-G100-2001-PL-RS GA Plan - Site - Level 01 Rev C	10046-A-DRG-Z0-G100-2002-PL-RS GA Plan - Site - Level 02 Rev D
10046-A-DRG-Z0-G100-2003-PL-RS GA Plan - Site - Level 03 Rev D	10046-A-DRG-Z0-G100-2004-PL-RS GA Plan - Site - Level 04 Rev D
10046-A-DRG-Z0-G100-2005-PL-RS GA Plan - Site - Level 05 Rev D	10046-A-DRG-Z0-G100-2006-PL-RS GA Plan - Site - Level 06 Rev D
10046-A-DRG-Z0-G100-2007-PL-RS GA Plan - Site - Level 07 Rev D	10046-A-DRG-Z0-G100-2008-PL-RS GA Plan - Site - Level 08 Rev D
10046-A-DRG-Z0-G100-2009-PL-RS GA Plan - Site - Level 09 Rev D	10046-A-DRG-Z0-G100-2030-PL-RS GA Plan - Site - Roof Plan Rev D
10046-A-DRG-Z0-G100-2099-PL-RS GA Plan - Site - Basement Rev D	10046-A-DRG-Z0-G100-2130-PL-RS GA Plan - Site - Future road Rev B (Indicative)
10046-A-DRG-Z1-G100-2099-PL-RS GA Plan - Plot A - Site - Basement 1 Rev D	10046-A-DRG-Z2-G100-2099-PL-RS GA Plan - Plot B - Site - Basement 1 Rev B
10046-A-DRG-Z2-G100-2000-PL-RS GA Plan - Plot B - Site - Ground Floor Rev E	10046-A-DRG-Z2-G100-2001-PL-RS GA Plan - Plot B - Site - First Floor Rev C

10046-A-DRG-Z2-G100-2130-PL-RS GA Plan - Plot B - Site - Future road Rev B (Indicative)	10046-A-DRG-A-G200-2000-PL-RS Building A - Plot A - Level 00 Rev A
10046-A-DRG-A-G200-2001-PL-RS Building A - Plot A - Level 01 Rev A	10046-A-DRG-A-G200-2002-PL-RS Building A - Plot A - Apartment Layouts - Level 02 Rev C
10046-A-DRG-A-G200-2003-PL-RS Building A - Plot A - Apartment Layouts - Level 03 Rev C	10046-A-DRG-A-G200-2004-PL-RS Building A - Plot A - Apartment Layouts - Level 04 Rev C
10046-A-DRG-A-G200-2005-PL-RS Building A - Plot A - Apartment Layouts - Level 05 Rev C	10046-A-DRG-A-G200-2006-PL-RS Building A - Plot A - Apartment Layouts - Level 06 Rev C
10046-A-DRG-A-G200-2007-PL-RS Building A - Plot A - Apartment Layouts - Level 07 Rev C	10046-A-DRG-A-G200-2008-PL-RS Building A - Plot A - Apartment Layouts - Level 08 Rev C
10046-A-DRG-A-G200-2009-PL-RS Building A - Plot A - Apartment Layouts - Level 09 Rev B	10046-A-DRG-A-G200-2030-PL-RS Building A - Plot A - Roof Plan - Roof Rev A
10046-A-DRG-B-G200-2000-PL-RS Building B - Plot A - Level 00 Rev C	10046-A-DRG-B-G200-2001-PL-RS Building B - Plot A - Level 01 Rev B
10046-A-DRG-B-G200-2002-PL-RS Building B - Plot A - Apartment Layouts - Level 02 Rev C	10046-A-DRG-B-G200-2003-PL-RS Building B - Plot A - Apartment Layouts - Level 03 Rev C
10046-A-DRG-B-G200-2004-PL-RS Building B - Plot A - Apartment Layouts - Level 04 Rev C	10046-A-DRG-B-G200-2005-PL-RS Building B - Plot A - Apartment Layouts - Level 05 Rev C
10046-A-DRG-B-G200-2006-PL-RS Building B - Plot A - Apartment Layouts - Level 06 Rev C	10046-A-DRG-B-G200-2007-PL-RS Building B - Plot A - Apartment Layouts - Level 07 Rev C
10046-A-DRG-B-G200-2008-PL-RS Building B - Plot A - Apartment Layouts - Level 08 Rev C	10046-A-DRG-B-G200-2009-PL-RS Building B - Plot A - Apartment Layouts - Level 09 Rev C
10046-A-DRG-B-G200-2030-PL-RS Building B - Plot A - Roof Plan - Roof Rev A	10046-A-DRG-C-G200-2000-PL-RS Building C - Plot A - Level 00 Rev A
10046-A-DRG-C-G200-2001-PL-RS Building C - Plot A - Level 01 Rev A	10046-A-DRG-C-G200-2002-PL-RS Building C - Plot A - Apartment Layouts - Levels 02 Rev C
10046-A-DRG-C-G200-2003-PL-RS Building C - Plot A - Apartment Layouts - Level 03 Rev C	10046-A-DRG-C-G200-2004-PL-RS Building B - Plot A - Apartment Layouts - Level 04 Rev C

10046-A-DRG-C-G200-2005-PL-RS Building B - Plot A - Apartment Layouts - Level 05 Rev C	10046-A-DRG-C-G200-2006-PL-RS Building B - Plot A - Apartment Layouts - Level 06 Rev C
10046-A-DRG-C-G200-2007-PL-RS Building B - Plot A - Apartment Layouts - Level 07 Rev C	10046-A-DRG-C-G200-2008-PL-RS Building C - Plot A - Apartment Layouts - Level 08 Rev B
10046-A-DRG-C-G200-2009-PL-RS Building C - Plot A - Apartment Layouts - Level 09 Rev C	10046-A-DRG-C-G200-2030-PL-RS Building C - Plot A - Roof Plan - Roof Rev B
10046-A-DRG-D-G200-2000-PL-RS Building D - Plot A - Level 00 Rev C	10046-A-DRG-D-G200-2001-PL-RS Building D - Plot A - Level 01 Rev C
10046-A-DRG-D-G200-2002-PL-RS Building D - Plot A - Apartment Layouts - Level 02 Rev B	10046-A-DRG-D-G200-2003-PL-RS Building D - Plot A - Apartment Layouts - Level 03 Rev B
10046-A-DRG-D-G200-2004-PL-RS Building D - Plot A - Apartment Layouts - Level 04 Rev B	10046-A-DRG-D-G200-2005-PL-RS Building D - Plot A - Apartment Layouts - Level 05 Rev B
10046-A-DRG-D-G200-2006-PL-RS Building D - Plot A - Apartment Layouts - Level 06 Rev B	10046-A-DRG-D-G200-2007-PL-RS Building D - Plot A - Apartment Layouts - Level 07 Rev A
10046-A-DRG-D-G200-2008-PL-RS Building D - Plot A - Apartment Layouts - Level 08 Rev A	10046-A-DRG-D-G200-2009-PL-RS Building D - Plot A - Apartment Layouts - Level 09 Rev A
10046-A-DRG-D-G200-2030-PL-RS Building D - Plot A - Roof Plan - Roof Rev A	10046-A-DRG-EF-G200-2000-PL-RS Building EF - Plot A - Level 00 Rev B
10046-A-DRG-EF-G200-2001-PL-RS Building EF - Plot A - Level 01 Rev B	10046-A-DRG-EF-G200-2002-PL-RS Building EF - Plot A - Apartment Layouts - Level 02 Rev B
10046-A-DRG-EF-G200-2003-PL-RS Building EF - Plot A - Apartment Layouts - Level 03 Rev B	10046-A-DRG-EF-G200-2004-PL-RS Building EF - Plot A - Apartment Layouts - Level 04 Rev B
10046-A-DRG-EF-G200-2005-PL-RS Building EF - Plot A - Apartment Layouts - Level 05 Rev B	10046-A-DRG-EF-G200-2006-PL-RS Building EF - Plot A - Apartment Layouts - Level 06 Rev B
10046-A-DRG-EF-G200-2007-PL-RS Building EF - Plot A - Apartment Layouts - Level 07 Rev B	10046-A-DRG-EF-G200-2008-PL-RS Building EF - Plot A - Apartment Layouts - Level 08 Rev C
10046-A-DRG-EF-G200-2009-PL-RS Building EF - Plot A - Apartment Layouts - Level 09 Rev A	10046-A-DRG-EF-G200-2030-PL-RS Building EF - Plot A - Roof Plan - Roof Rev B

10046-A-DRG-G-G200-2000-PL-RS Building G - Plot A - Level 00 Rev C	10046-A-DRG-G-G200-2001-PL-RS Building G - Plot A - Level 01 Rev B
10046-A-DRG-G-G200-2002-PL-RS Building G - Plot A - Apartment Layouts Rev B	10046-A-DRG-G-G200-2003-PL-RS Building G - Plot A - Apartment Layouts - Levels 03 Rev B
10046-A-DRG-G-G200-2030-PL-RS Building G - Plot A - Roof Plan - Roof Rev B	10046-A-DRG-H-G200-2000-PL-RS Building H - Plot A - Level 00 Rev C
10046-A-DRG-H-G200-2001-PL-RS Building H - Plot A - Level 01 Rev V	10046-A-DRG-H-G200-2002-PL-RS Building H - Plot A - Apartment Layouts - Level 02 Rev C
10046-A-DRG-H-G200-2003-PL-RS Building H - Plot A - Apartment Layouts - Level 03 Rev C	10046-A-DRG-H-G200-2030-PL-RS Building H - Plot A - Roof Plan - Roof Rev B
10046-A-DRG-J-G200-2000-PL-RS Building J - Plot B - Level 00 Rev D	10046-A-DRG-J-G200-2001-PL-RS Building J - Plot B - Level 01 Rev B
10046-A-DRG-J-G200-2002-PL-RS Building J - Plot B - Apartment Layouts - Level 02 Rev D	10046-A-DRG-J-G200-2003-PL-RS Building J - Plot B - Apartment Layouts - Level 03 Rev B
10046-A-DRG-J-G200-2004-PL-RS Building J - Plot B - Apartment Layouts - Level 04 Rev C	10046-A-DRG-J-G200-2030-PL-RS Building J - Plot B - Roof Plan - Roof Rev A
10046-A-DRG-KL-G200-2000-PL-RS Building KL - Plot B - Level 00 Rev B	10046-A-DRG-KL-G200-2001-PL-RS Building KL - Plot B - Level 01 Rev C
10046-A-DRG-KL-G200-2002-PL-RS Building KL - Plot B - Apartment Layouts - Level 02 Rev C	10046-A-DRG-KL-G200-2003-PL-RS Building KL - Plot B - Apartment Layouts - Level 03 Rev C
10046-A-DRG-KL-G200-2004-PL-RS Building KL - Plot B - Apartment Layouts - Level 04 Rev C	10046-A-DRG-KL-G200-2005-PL-RS Building KL - Plot B - Apartment Layouts - Level 05 Rev C
10046-A-DRG-KL-G200-2006-PL-RS Building KL - Plot B - Apartment Layouts - Level 06 Rev C	10046-A-DRG-KL-G200-2007-PL-RS Building KL - Plot B - Apartment Layouts - Level 07 Rev B
10046-A-DRG-KL-G200-2008-PL-RS Building KL - Plot B - Apartment Layouts - Level 08 Rev B	10046-A-DRG-KL-G200-2009-PL-RS Building KL - Plot B - Apartment Layouts - Level 09 Rev B
10046-A-DRG-KL-G200-2030-PL-RS Building KL - Plot B - Roof Plan - Roof Rev A	10046-A-DRG-MN-G200-2000-PL-RS Building MN - Plot B - Level 00 Rev C
10046-A-DRG-MN-G200-2001-PL-RS Building MN - Plot B - Level 01 Rev D	10046-A-DRG-MN-G200-2002-PL-RS Building MN - Plot B - Apartment Layouts - Level 02 Rev D

10046-A-DRG-MN-G200-2003-PL-RS Building MN - Plot B - Apartment Layouts - Level 03 Rev D	10046-A-DRG-MN-G200-2004-PL-RS Building MN - Plot B - Apartment Layouts - Level 04 Rev D
10046-A-DRG-MN-G200-2005-PL-RS Building MN - Plot B - Apartment Layouts - Level 05 Rev D	10046-A-DRG-MN-G200-2006-PL-RS Building MN - Plot B - Apartment Layouts - Level 06 Rev D
10046-A-DRG-MN-G200-2007-PL-RS Building MN - Plot B - Apartment Layouts - Level 07 Rev C	10046-A-DRG-MN-G200-2008-PL-RS Building MN - Plot B - Apartment Layouts - Level 08 Rev D
10046-A-DRG-MN-G200-2009-PL-RS Building MN - Plot B - Apartment Layouts - Level 09 Rev D	10046-A-DRG-MN-G200-2030-PL-RS Building MN - Plot B - Roof Plan - Roof Rev B
10046-A-DRG-O-G200-2000-PL-RS Building O - Plot B - Level 00 Rev B	10046-A-DRG-O-G200-2001-PL-RS Building O - Plot B - Level 01 Rev A
10046-A-DRG-O-G200-2002-PL-RS Building O - Plot B - Apartment Layouts - Level 02 Rev A	10046-A-DRG-O-G200-2003-PL-RS Building O - Plot B - Apartment Layouts - Level 03 Rev A
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10046-A-DRG-O-G200-2008-PL-RS Building O - Plot B - Apartment Layouts - Level 08 Rev A	10046-A-DRG-O-G200-2009-PL-RS Building O - Plot B - Apartment Layouts - Level 09 Rev A
10046-A-DRG-O-G200-2030-PL-RS Building O - Plot B - Roof Plan - Roof Rev A	10046-A-DRG-ZO-G200-5001-PL-RS Wheelchair Accessible Apartments - Building A Rev B
10046-A-DRG-ZO-G200-5002-PL-RS Wheelchair Accessible Apartments - Building B Rev B	10046-A-DRG-ZO-G200-5003-PL-RS Wheelchair Accessible Apartments - Building B Rev B
10046-A-DRG-ZO-G200-5004-PL-RS Wheelchair Accessible Apartments - Building C Rev B	10046-A-DRG-ZO-G200-5005-PL-RS Wheelchair Accessible Apartments - Building D Rev B
10046-A-DRG-ZO-G200-5006-PL-RS Wheelchair Accessible Apartments - Building EF Rev B	10046-A-DRG-ZO-G200-5010-PL-RS Wheelchair Accessible Apartments - Building KL Rev A

10046-A-DRG-Z0-G200-5101-PL-RS Typical Apartment - 1 Bed	10046-A-DRG-Z0-G200-5102-PL-RS Typical Apartment - 2 Bed
10046-A-DRG-Z0-G200-5103-PL-RS Typical Apartment - 3 Bed	10046-A-DRG-Z0-G200-5104-PL-RS Typical Apartment - 3 Bed Townhouse
10046-A-DRG-Z0-G200-5105-PL-RS Typical Apartment - Duplex	10046-A-DRG-A-F900-2000-PL-RS Building A- Unit Matrix Rev C
10046-A-DRG-B-F900-2000-PL-RS Building B - Unit Matrix Rev C	10046-A-DRG-C-F900-2000-PL-RS Building C - Unit Matrix Rev C
10046-A-DRG-D-F900-2000-PL-RS Building D - Unit Matrix Rev C	10046-A-DRG-EF-F900-2000-PL-RS Building EF - Unit Matrix Rev C
10046-A-DRG-G-F900-2000-PL-RS Building G - Unit Matrix Rev C	10046-A-DRG-H-F900-2000-PL-RS Building H- Unit Matrix Rev C
10046-A-DRG-J-F900-2000-PL-RS Building J - Unit Matrix Rev E	10046-A-DRG-KL-F900-2000-PL-RS Building KL - Unit Matrix Rev C
10046-A-DRG-MN-F900-2000-PL-RS Building MN - Unit Matrix Rev D	10046-A-DRG-O-F900-2000-PL-RS Building O - Unit Matrix Rev B
Exa_1752_001 ILLUSTRATIVE LANDSCAPE PLAN Rev D	Exa_1752_010 LANDSCAPE LEGEND Rev B
Exa_1752_100 GA LANDSCAPE GROUND FLOOR PLAN Rev D	Exa_1752_101 Rev A GA GROUND FLOOR SHEET 1 OF 2 Rev D
Exa_1752_102 Rev A GA GROUND FLOOR SHEET 2 OF 2 Rev B	Exa_1752_112 GA PODIUM PLOT B Rev C
Exa_1752_121 GA ROOF TERRACE PLOT A BLOCKS A, B & C Rev C	Exa_1752_122 GA ROOF TERRACE PLOT A BLOCKS K & L Rev C
Exa_1752_200 PLANTING SCHEDULES AND SPECIFICATION Rev D	Exa_1752_201 PLANTING PLAN GROUND FLOOR SHEET 1 OF 2 Rev D
Exa_1752_202 PLANTING PLAN GROUND FLOOR SHEET 2 OF 2 Rev B	Exa_1752_212 PLANTING PLAN PODIUM PLOT B Rev B
Exa_1752_221 PLANTING PLAN ROOF TERRACE PLOT A BLOCKS A, B & C Rev C	Exa_1752_222 PLANTING PLAN ROOF TERRACE PLOT A BLOCKS K & L Rev C
Exa_1752_301 LEVELS GROUND FLOOR SHEET 1 OF 2 Rev C	Exa_1752_302 LEVELS GROUND FLOOR SHEET 2 OF 2 Rev B
Exa_1752_500 SECTION REFERENCE PLAN Rev C	Exa_1752_501 SECTION 1 – 4
Exa_1752_502 SECTION 5 – 8	Exa_1752_503 SECTION 9 - 13

Exa_1752_701 LANDSCAPE SOFT DETAIL	Exa_1752_702 LANDSCAPE SOFT DETAIL
Exa_1752_703 LANDSCAPE SOFT DETAIL	Exa_1752_704 LANDSCAPE SOFT DETAIL
Exa_1752_705 LANDSCAPE SOFT DETAIL	Exa_1752_706 LANDSCAPE SOFT DETAIL
Proposed Sections	
10046-A-DRG-Z1-G100-3001-PL-RS GA Section - Plot A - Section 1 & 2 Rev B	10046-A-DRG-Z2-G100-3001-PL-RS GA Section - Plot B - Section 1 & 2 Rev C
Proposed Elevations	
10046-A-DRG-Z0-G100-4001-PL-RS GA Elevation - Proposed - Site Elevations North & South Rev D	10046-A-DRG-Z0-G100-4002-PL-RS GA Elevation - Proposed - Site Elevations East & West Rev D
10046-A-DRG-Z1-G100-4001-PL-RS GA Elevation - Plot A - Elevation 01 - North Elevation, East Elevation Rev B	10046-A-DRG-Z1-G100-4002-PL-RS GA Elevation - Plot A - Elevation 02 - South Elevation, West Elevation Rev B
10046-A-DRG-Z1-G100-4003-PL-RS GA Elevation - Plot A - Elevation 03 - Internal site Elevation 1 & 2 Rev B	10046-A-DRG-Z1-G100-4004-PL-RS GA Elevation - Plot A - Elevation 04 - Internal site Elevation 3 & 4 Rev B
10046-A-DRG-Z2-G100-4001-PL-RS GA Elevation - Plot B - Elevation 01 - North Elevation, East Elevation Rev D	10046-A-DRG-Z2-G100-4002-PL-RS GA Elevation - Plot B - Elevation 02 - South Elevation, West Elevation Rev D
10046-A-DRG-Z2-G100-4003-PL-RS GA Elevation - Plot B - Elevation 03 - Internal site Elevation Rev D	10046-A-DRG-A-G200-4000-PL-RS GA Elevation - Plot A - Façade Elevation - Building A Rev B
10046-A-DRG-B-G200-4000-PL-RS GA Elevation - Plot A - Façade Elevation - Building B Rev B	10046-A-DRG-C-G200-4000-PL-RS GA Elevation - Plot A - Façade Elevation - Building C Rev B
10046-A-DRG-D-G200-4000-PL-RS GA Elevation - Plot A - Façade Elevation - Building D Rev B	10046-A-DRG-EF-G200-4000-PL-RS GA Elevation - Plot A - Façade Elevation - Building EF Rev B
10046-A-DRG-G-G200-4000-PL-RS GA Elevation - Plot A - Façade Elevation - Building G Rev B	10046-A-DRG-H-G200-4000-PL-RS GA Elevation - Plot A - Façade Elevation - Building H Rev B
10046-A-DRG-J-G200-4000-PL-RS GA Elevation - Plot B - Façade Elevation - Building J Rev D	10046-A-DRG-KL-G200-4000-PL-RS GA Elevation - Plot B - Façade Elevation - Building KL Rev B
10046-A-DRG-MN-G200-4000-PL-RS GA Elevation - Plot B - Façade Elevation - Building MN Rev D	10046-A-DRG-O-G200-4000-PL-RS GA Elevation - Plot B - Façade Elevation - Building O Rev A

Supporting documents	
Title	Date
Design and Access Statement	December 2017
Design and Access Statement Addendum	December 2018
Landscape and Biodiversity DAS Addendum	December 2018
Environmental Statement	December 2017
Environmental Statement Non-Technical Summary	December 2017
Addendum Environmental Statement	December 2018
Addendum Environmental Statement Non-Technical Summary	December 2018
Planning Statement	December 2016
Planning Statement Addendum	December 2017
Statement of Community Involvement	December 2016
Statement of Community Involvement Addendum	March 2018
Transport Assessment	December 2017
Transport Assessment Addendum	December 2018
Employment Strategy	December 2016
Energy Statement	December 2018
Sustainability Statement	December 2016
Sustainability Statement Addendum	December 2017
BREEAM Pre-Assessment December	December 2016
BREEAM Pre-Assessment Addendum	December 2017
Internal Daylight and Sunlight Report	December 2018
Utilities Assessment	December 2017
Arboricultural Impact Assessment	December 2016

Introduction

2 Having assumed authority to determine this planning application, this report sets out the matters that the Mayor must consider in forming a view over whether to grant or refuse planning permission and to guide his decision making at the upcoming representation hearing. This report includes a recommendation from GLA officers, as set out below.

Officer recommendation - reasons for approval

3 The Mayor, acting as the Local Planning Authority, has considered the circumstances of this application against strategic and local development plan policy, national planning policy, relevant supplementary planning guidance and all material planning considerations. He has had regard to Greenwich Council's planning board report, dated 9 July 2018, the draft decision notice refusing the application, and all consultation responses and representations made on the case. The reasons set out below are why this application is acceptable in planning policy terms:

- I. The site lies within the Charlton Riverside Opportunity Area and within a Strategic Development Location identified for comprehensive regeneration in Greenwich Council's Local Plan and Charlton Riverside SPD (2017). The Opportunity Area designation and local policy framework supports the redevelopment of the site to provide housing and employment uses. The principle of a residential led, mixed use development is strongly supported by both strategic and local planning policy. The proposals would provide much needed housing for which there is an identified and well-documented need. The proposals make provision for the delivery of a significant quantum of flexible employment floorspace, that could support small to medium enterprises and the provision of social infrastructure floorspace including creche and community uses, which is compatible with the proposed residential uses. The proposed design and mitigation to be secured by planning condition and/or obligation will ensure the successful co-location of the development with surrounding land uses, safeguarding the continued function of existing industrial uses, Safeguarded Wharves, Strategic Industrial Land and operations at Imex House in accordance with Agent of Change Principles. The proposal optimises the development density, taking into account the accessibility of the location and its existing policy context. The proposal is therefore policy compliant in land use terms in accordance with the NPPF, London Plan Policies 2.13, 3.3, 3.4, 3.11, 3.16, 4.4, 4.7, 4.12, draft London Plan Policies GG2, GG4, GG5, D6, D12, SD1, H1, H5, E7 E9, E11, S1, Greenwich Local Plan Policies H1, H2, H3, CH1, CH2 and complies in land use terms with the Charlton Riverside SPD (2017).
- II. The scheme would provide 771 residential units, of which 292 would be affordable, secured on a grant funded basis (40% by habitable room, 38% by unit). The housing proposed is of a high residential quality and the mix responds to local need. Overall, the scheme would make a significant contribution to housing delivery targets for Greenwich. The proposed level of affordable housing responds to the strategic target set out in the Draft London Plan and meets the requirements of the Mayor's Affordable Housing & Viability SPG. A review mechanism would be triggered if an agreed level of progress is not made within 24 months of grant of planning permission and would secure additional affordable homes if viable, and further review would be triggered on disposal of 75% of the residential units. On this basis, the applicant has demonstrated compliance with London Plan Policies 3.3, 3.4, 3.5, 3.8, 3.9, 3.11, 3.12, draft London Plan Policies D4, D6, H1, H3, H5, H6, H7 and H12, the Mayor's Housing SPG (2016 as amended), the Mayor's Affordable Housing and Viability SPG (2017), Greenwich Local Plan Policies H1, H2, H3, H5, and DH1, and the Charlton Riverside SPD (2017).
- III. The design and layout principles are well-considered and the scheme achieves a high quality of placemaking, with well-defined new public routes and spaces, enhanced by high quality landscaping. The massing strategy responds to the site characteristics and the existing and emerging context. The quality of design, architecture and materials will ensure a distinctive and high quality development which will contribute positively to the regeneration of this part of Charlton Riverside. Less than substantial harm has been identified to the setting of the Charlton Riverside Conservation Area and the locally listed assets at Atlas and Derrick Gardens contained within it. However, it is considered that, the public benefits delivered by

the scheme, namely the delivery of housing including 40% affordable housing secured on a grant funded basis, a policy compliant mix of uses including community facilities, contribution towards important infrastructure including an east-west route through the area, and significant public realm enhancements, in addition to ecological enhancements, clearly outweigh the limited harm to identified designated heritage assets. Furthermore, the removal of existing areas of vehicle storage that exist between Atlas and Derrick Gardens and replacement with new landscaped public routes into the site, will enhance the character and appearance of the Conservation Area, and a strategy for investigating and recording non-designated heritage assets on site has been secured. The proposals adhere to the principles of designing out crime. As such the proposal complies with Policies 3.5, 3.6, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8 and 7.13 of the London Plan; Policies GG6, D1, D2, D4, D7, D8, D9, D10, D11, D12, D13, HC1, G5 and G7 of the draft London Plan, Greenwich Local Plan Policies H5, DH1, DH2, DH3, Policy DH(b), Policy DH(e), Policy DH(g), Policy DH(i) and the Charlton Riverside SPD (2017).

- IV. The proposed development has embedded the principles of inclusive access and would comply with the relevant inclusive design housing standards. As such, the scheme complies with London Plan Policies 3.8, 7.2 and 7.6, draft London Plan Policies D3 and D5, Greenwich Local Plan Policies DH1 and H5.
- V. The proposed development has demonstrated that a high standard of sustainable design and construction would be achieved, minimising carbon dioxide emissions, using energy efficiently and including renewable energy in accordance with the energy hierarchy. The development would be acceptable in respect of flood risk, deliver sustainable urban drainage, ecology and urban greening benefits over the existing situation at the site. The environmental impacts of the development, in terms of minimising exposure to poor air quality, wind conditions, addressing contaminated land and waste management, are acceptable taking into account the proposed mitigation measures. As such and subject to the provisions secured by planning condition and obligation relating to sustainable development, the scheme complies with the policies contained with Chapter 5 and Policies 7.7 and 7.14 of the London Plan, draft London Plan chapters 8 and 9 and Policies SI1, SI2 and SI3, Greenwich Policies DH1, H5, E1, OS4, OS(f), E2, E(a).
- VI. The development proposals would have an acceptable impact on neighbourhood amenity. No neighbouring residential properties would experience unacceptable reductions to their daylight and sunlight. The proposals would not unacceptably reduce privacy to neighbouring residential properties and issues of noise and disturbance to adjacent premises would be adequately mitigated through planning conditions. The strategic industrial operations at the nearby Safeguarded Wharves would be safe guarded through the use of appropriate planning conditions. As such the proposed development complies with London Plan Policies 7.6, 7.7 and 7.15, draft London Plan Policies D2, D8, D12 and D13, Greenwich Local Plan Policies H5, DH1, DH(b) and H5.
- VII. The quantum of proposed car parking across all uses is acceptable subject to a suitable framework of controls including a car parking management plan, electric vehicle charging points, travel plans and car club spaces. The proposal strikes an appropriate balance between promoting new development and encouraging cycling, walking and public transport use. As such the proposed development complies with the policies contained within Chapter 6 of the London Plan, Chapter 10 of the draft London Plan, Greenwich Local Plan Policies IM4, IM(a), IM(b) and IM (c).
- VIII. Appropriate, reasonable and necessary planning conditions and planning obligations are proposed to ensure that the development is acceptable in planning terms and the environmental impacts are mitigated. Accordingly, there are no, or insufficient, grounds to

withhold planning consent on the basis of the policies considered and other material planning considerations.

Recommendation

4 That the Mayor, acting as Local Planning Authority, grants planning permission in respect of application 16/4008/F, subject to prior completion of a section 106 legal agreement, and the inclusion of planning conditions and informatives, as summarised below. The detailed wording of conditions and informatives will be set out in an addendum to this report.

5 That the Mayor delegates authority to the Assistant Director – Planning and the Director of Development, Enterprise and Environment to issue the planning permission and agree, add, delete or vary the final wording of the conditions and informatives as required.

6 That the Mayor agrees that the Assistant Director of Planning and the Director of Development and Environment, be given delegated authority to negotiate and complete the s106 legal agreement, the principles of which have been agreed with the applicants as set out in the heads of terms detailed below.

7 That the Mayor delegates authority to the Assistant Director – Planning and the Director of Development, Enterprise and Environment to refuse planning permission if, by 29 April 2019 the section 106 legal agreement has not been completed.

8 That the Mayor notes the approval of details pursuant to conditions imposed on the planning permission would be submitted to, and determined by, Greenwich Council.

9 That the Mayor notes that Greenwich Council would be responsible for the enforcement of the conditions attached to the permission.

Section 106 Legal agreement - Heads of Terms

10 The following are recommended as the heads of terms for the section 106 agreement, referred to in the above Recommendation.

Affordable housing

The following affordable housing provisions would be secured:

- a) 292 affordable units to be secured on a grant funded basis, comprising 165 London Affordable Rent units and 127 shared ownership units, with a fallback position of 35% affordable housing should grant not be available;
- b) Details of affordable housing definitions, fit out, transfer/lease to a Registered Provider, nominations, priority for those living/working in the borough, service charges, the income thresholds for the intermediate accommodation, rent levels for the affordable rented units and the retention of the affordable units at the proposed rent levels, would be set out in the section 106 agreement.
- c) All affordable rent units would be secured at London Affordable Rent in accordance with GLA standard definitions;

- d) All shared ownership secured at income caps of £55,000 for 1 bed, £71,000 for 2 bed and £85,000 for 3 bed for the first three months, before being offered to eligible purchasers on household incomes of up to £90,000.
- e) An early implementation review mechanism, which would be triggered if the development has not been substantially implemented within two years of the date of consent. This will be forward-looking and will analyse the development costs and values at that time, capturing any uplift in viability towards a maximum of 50% of the total habitable rooms delivered by the scheme. It is expected that any uplift in affordable accommodation at this early stage would be delivered on site.
- f) A late stage review mechanism triggered on disposal of 75% of the residential units, to analyse the development costs and values at that time, capturing any uplift in viability towards a maximum of 50% of the total habitable rooms delivered by the scheme. It is expected that any uplift in affordable accommodation at this early stage would be delivered as a payment in-lieu towards additional delivery off site.

Transport

The following transport mitigation and improvement measures would be secured:

- a) Travel Plans and contribution of £1,260 towards monitoring;
- b) East West Access Road contribution of £2,100,000 towards delivery of route and the safeguarding of land within the site for delivery of the route;
- c) Bus service enhancement contribution of £830,000;
- d) Car Club – a commitment to providing car club scheme in the vicinity of the site for a period of 5 years in addition to £3,000 index linked towards Council’s cost of making a traffic order and £500 index linked per car club parking bay road markings, plus a £231,300 payment to provide membership to future occupants for a period of 5 years;
- e) Monetary contribution of £10,000 to facilitate the investigation and implementation of the extension of the CPZ zone to include the surrounding area;
- f) Parking permit exemption for future residents;
- g) Pedestrian and cycle network improvements contribution of £150,000;
- h) Cycle training contribution of £15,420;
- i) A car parking management plan, including monitoring and review of usage with a review to reducing provision.

Employment and training

The following employment and training measures would be secured:

- a) Commitment and participation towards GLLaB and business support including £40,690 contribution towards commercial employment and training and £771,000 towards residential employment and training;

Other obligations

Other obligations would be secured as follows:

- a) Sound proofing to Imex House;
- b) Stone Foundries noise dampening measures;
- c) Business relocation strategy;

- d) Marketing strategy for non-residential floorspace to include details of how and where the units will be marketed and rental levels to ensure these are being marketed at a reasonable rate;
- e) Local workspace strategy including commitment to long lease with workspace provider, agreed affordable price point for provider and target end users, rent increase pegged to RPI, co-design of space to ensure it meets the requirements of end users and support for fit out costs;
- f) Scheme for establishing links with local education establishments;
- g) Provision of 17 sq.m. floorspace allocated within building on Plot B for use as police facilities;
- h) Agreement to community use of spaces within Plot A;
- i) Carbon offset contribution – to be calculated following the submission of revised energy strategy secured by planning condition;
- j) Entering into Agreement under Section 278 of the Highways Act 1980;
- k) Payment of legal, engineers cost;
- l) Payment of S106 monitoring costs.

Conditions to be secured ¹

1. Approved plans
2. Phasing plan
3. Expiration of planning permission
4. Compliance with EIA
5. Quantum of development
6. Demolition and construction method statement
7. Demolition and construction travel plan
8. Construction Logistics Plan
9. Dust mitigation measures during construction
10. Site waste management plan
11. Unexploded ordnance
12. Basement impact assessment
13. Details of Materials
14. Residential entrance design
15. Basement evacuation plan
16. Contamination
17. Piling
18. Drainage strategy
19. Water supply infrastructure study
20. Archaeology
21. Written scheme of archaeological investigation
22. Public engagement programme for heritage assets of archaeological interest
23. Cranes
24. London City Airport's OLS
25. Tree protection plan
26. Wheelchair Adaptable Dwellings
27. Wheelchair Accessible Dwellings
28. Construction Plant and Machinery (NRMM)
29. Boiler, Biomass and CHP details
30. Secure by Design
31. Management plan for the prevention of antisocial behaviour
32. Boundary treatments

¹ Draft conditions have been prepared and will be published as an addendum to this report; this list provides a summary of the draft notice condition headings

33. Flood Evacuation Plan
34. Implementation of the Flood Risk Assessment
35. Traffic calming measures
36. Accessibility arrangements
37. Landscaping Strategy
38. Children's play space
39. Refuse and recycling
40. Electric Vehicle Charging Points
41. Car Park Management Plan
42. Delivery and Servicing Plan
43. Vehicular access and management
44. Cycle parking provision
45. Car parking provision
46. Carbon emissions reduction
47. Energy performance
48. BREEAM
49. Heating, Cooling and Power Networks
50. Future connection to heating, cooling and power networks
51. Water efficiency
52. On-site renewable energy technologies
53. On-site renewable technologies -monitoring
54. Overheating
55. Implementation of Biodiversity mitigation/enhancement
56. Ecological / Landscape management plan
57. Green roofs
58. Timing of Vegetation Clearance (Breeding Birds)
59. Control of invasive plants
60. Precautionary Bat Survey
61. Bird boxes
62. Bat boxes
63. Low reflectivity glass
64. Minimum floorspace for Policy Welfare Facilities
65. Removal of permitted development rights for conversion to residential use
66. Restriction on D1 use
67. Sound insulation for commercial premises
68. Opening hours
69. Amplified music/sound
70. Noise from plant
71. Mechanical and Extract ventilation
72. Construction dust/emissions monitoring
73. Community Use Plan
74. Creche Use
75. Lighting Strategy
76. Details of roof plant
77. Noise Criteria compliance
78. Noise Criteria testing and implementation
79. Wind testing and mitigation
80. Access and Heritage Interpretation Plan
81. Building Recording and Historic Analysis

Publication protocol

11 This report has been published seven days prior to the Representation Hearing, in accordance with the GLA procedure for Representation Hearings. Where necessary, an addendum to this report will be published on the day of the Representation Hearing. This report, any addendum, draft decision notices and the Mayor of London's decision on this case will be made available on the GLA website:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/vip-trading-estate-public-hearing>

Site description

12 The 2.5 hectare site is located within the Charlton Riverside area of the Royal Borough of Greenwich. The site sits within a predominantly industrial area located between Woolwich Road and the southern bank of the River Thames, close to the Thames Barrier. The main access to the site is from Hope & Anchor Lane which runs north from Woolwich Road, or via Bugsby's Way which runs east to west, from the sites western edge.

13 The site is irregular in shape and mainly consists of two main areas, referred to as Plot A and Plot B. Plot A is the northern-most plot and is bound by commercial/industrial units to the north, east and south, and residential properties at Atlas & Derrick Gardens to the west. An existing recording studio known as Imex House is located directly to the northern site boundary and a manufacturing complex known as Stone Foundries is located directly to the eastern plot boundary. A small access strip extends west from this plot, between the residential properties connecting the site to Anchor & Hope Lane. The plot is currently in a mix of commercial, industrial and Sui Generis uses and comprises three, large three storey buildings and associated hardstanding. Plot B sits to the south and is bounded by Atlas & Derrick Gardens to the north, commercial/industrial units to the south and east, and Anchor & Hope Lane to the west. A van hire company currently operates from the two storey building which occupies the site.

14 The surrounding area comprises various active industrial uses, including a large Sainsbury's distribution centre and the safeguarded Angerstein and Murphy's Wharves to the north-west and Riverside Wharf to the north-east. The portion of land immediately adjacent to the site to the west is designated as a Strategic Industrial Location. The industrial uses on the application site and located immediately adjacent are not safeguarded in policy terms and the draft London Plan defines the site as a Non-Designated Industrial site.

15 At the strategic planning scale, the site forms part of the wider Charlton Riverside Opportunity Area (OA) which has the potential to deliver 1,000 jobs and a minimum of 3,500 new homes and recognises the opportunity for development to complement the opportunities at Deptford/Greenwich, Greenwich Peninsula and Woolwich. The OA also recognises the Strategic Industrial Location designation of parts of wider site and the safeguarded wharves such as Murphy's and Angerstein with its strategic railhead.

16 At the local level, the Council's Core Strategy identifies the site as part of the Charlton Riverside Strategic Development Location which reflects the OA status through its redevelopment aspirations to deliver an attractive and vibrant mixed use urban quarter. In June 2017, the Council adopted the revised Charlton Riverside Masterplan SPD which establishes a revised vision to substantially increase housing and employment delivery in the area and deliver up to 7,500 new homes, in addition to an extra 4,400 jobs over and above existing employment levels. The SPD recommended that the existing residential development, Atlas and Derrick Gardens, which adjoins Plot A and the land which extends north from the site along Anchor and Hope Lane to incorporate

Cory's Wharf, Vaizey's Wharf, and the Hope and Anchor Pub along Riverside become a conservation area. This was adopted in March 2018, is referred to as the Charlton Riverside Conservation Area and is a designated heritage asset. The majority of the site itself is not within the Conservation Area, with the exception of a small, currently closed off, access route from Anchor and Hope Lane to the site which runs between Atlas and Derrick Gardens. This is currently used for large vehicle storage. The site does not contain any statutorily listed buildings but is within an Archaeological Priority Zone. The properties at Atlas and Derrick Gardens and part of the Stone Foundries industrial complex are included on the local heritage register. The site is also within the Thames Policy Area and Flood Risk Zone 3.

17 Charlton National Rail station is situated approximately 350 metres to the south of the site, providing access to National Rail services to London Bridge, Cannon Street and Dartford. Bus routes 472 and 486 serve bus stops within 300 metres of the site, providing direct links to Greenwich Peninsula, Plumstead, Thamesmead and Bexleyheath. Access to London Underground or Docklands Light Railway (DLR) services are some considerable distance away and as such the Charlton Riverside Opportunity Area currently records a low Public Transport Accessibility Level (PTAL) score in many areas. The site records a range of PTALs from 4 in the southern end to 2 at the northern end. The applicant has produced a bespoke PTAL assessment report as part of the application, which provides justification for the site having an average PTAL of 4.

Details of the proposal

18 Since the submission of the application to Greenwich Council in January 2017, the proposals have been subject to a series of revisions namely to reduce the massing and residential quantum. The revisions submitted in December 2017, February 2018 and December 2018 form the basis of the proposals considered in this report. The planning history is set out in detail in paragraphs 29 to 41 below.

19 The proposals considered within this report seek full planning permission for the redevelopment of the site to provide 11 buildings ranging from 2 to 10 storeys in height to provide 771 residential units, with flexible uses commercial (Use Classes B1/A1/A2/A3/D1/D2) alterations to existing vehicular access and creation of new pedestrian accesses, open space and landscaping, associated car and cycle parking, refuse and recycling storage, plant and all other associated works

20 Following the Mayor's decision to call in the application and to act as local planning authority for the purposes of determining it, the applicant has made the following amendments to the scheme. These amendments were subject to public consultation between 3 December 2018 to 14 January 2019.

- the reduction in height of Building G by two storeys and the introduction of a setback to create a part three, part four storey building;
- the reduction in height of two storeys of Building J to five storeys;
- the increase in height of Building D by one storey to ten storeys;
- the increase in height of Buildings E and F by one storey to part eight, part nine and part ten storeys;
- the increase in the quantum of flexible commercial floorspace from 3,201 to 3,250 sq.m. (GEA), or from 3,068 to 3,097 sq.m. (GIA);
- a reduction in the number of car parking spaces by two and the increase in cycle parking provision from 1,323 to 1,400 spaces;
- the relocation of the car park entrance to the north east of Plot A and the relocation of residential entrances of Building F to be accessed from the east-west link.
- The amendments do not seek to alter the quantum of residential units (771) or the quantum of community floorspace (909 sq.m. GEA) originally proposed, but alter the residential mix

resulting in a reduction of four studio units; an increase of two one bedroom units and five two bedroom units; and the reduction of one three bed unit and two four bedroom units.

21 The development would comprise eleven buildings, across two development Plots. Plot A comprising buildings A to H is laid out on a broad street-based pattern, with spines of amenity and play space for future residents of the scheme in between. Plot B, comprising buildings J to O, sit upon a commercial podium, with the exception of Building O which is a standalone building in the south-east corner of the plot. All buildings in Plot B are residential above ground floor level with the exception of Building O which is residential above first floor. The single storey podium would provide amenity and playspace for the residents living in the proposed development.



Figure 1: Proposed massing (taken from DAS revised addendum December 2018)

22 Plot A is predominantly residential in nature, comprising a mixture of one, two and three bed flats, and three and four bedroom townhouses. Building B accommodates 338 sq.m. of creche space (Use class D1/D2) at ground floor and Building C accommodates 496 sq.m. of community space (Use Class D1/D2) at ground floor. Plot B accommodates 3,097 sq.m. of B1 workspace at podium level and 183 sq.m. of flexible retail (Use class A1-5). Buildings J to N above the podium are residential.



Figure 2: Proposed ground floor plan - Plot A (taken from 10046-A-DRG-Z0-G100-2000-PL-RS Rev E)

23 All ground floor residential flats and townhouses in Plot A would have direct and individual entrances off the public realm. The flats above would be accessed by residential cores within each building, which are evenly spaced throughout the scheme. Building G and H, the closest to the existing Atlas & Derrick Gardens comprise a mixture of flats and townhouses, the latter with rear gardens to respond to the terrace character of the existing residential houses to the west. Plot A is also accessed on foot (or cycle) via a new landscaped 'eco walk' from Anchor and Hope Lane between Atlas and Derrick Gardens. The buildings on Plot A range from two to ten storeys in height, stepping up in scale away from existing residential properties.

24 As shown in Figure 3 below, the podium level of Plot B will comprise amenity space for future residents which would be accessed from five residential cores, corresponding to the residential buildings J to N. The proposed buildings are arranged in a broad perimeter block fashion, with the buildings ranging from five to ten storeys in height, including the podium level.



Figure 3: Proposed first floor plan - Plot B (taken from 10046-A-DRG-Z2-G100-2001-PL-RS Rev C)

25 The revisions undertaken have sought to respond further to the scale of the existing residential properties in Atlas and Derrick Gardens and reduce the proposed development's impact on amenity, outlook, privacy and daylight/sunlight of these properties. A summary of the amendments are provided in paragraph 20 above, however, the revisions proposed a reduction in two stories of Building G, in addition to a reduction of two stories of Building J and the introduction of a set back storey to this building. Figure 1 also demonstrates the proposed massing.

26 The scheme proposes a total of 208 car parking spaces, which includes provision for both of the residential and commercial uses proposed. There will be 78 accessible residential bays. A total of 1,400 cycle spaces are provided across the entire scheme. All car parking is contained at basement level for both plots, with the main vehicular access to the proposed development off Anchor and Hope Lane. The ramped basement access to Plot A is located at north east corner of the Plot, with access to Plot B to the rear of the podium on the eastern elevation.

27 The proposals also include a new landscaped pedestrian route linking Anchor and Hope Lane to the site by utilising the existing vehicle storage area between Atlas and Derrick Gardens. This route is referred to as the 'eco walk.' In addition, a new landscaped public route extending from the north-east corner of the site towards the Thames Path is also proposed. Vehicle access is also maintained to Imex House, an existing recording studio and artist studio space directly to the north of Plot A, via the proposed 'play street' between Buildings D, EF and G and H.

Relevant planning history

28 The site has limited planning history and no applications of relevance.

Current application

29 The scheme was subject to extensive pre-application discussions with GLA offices as well as Royal Borough of Greenwich officers. On 19 November 2015, a formal pre-planning application meeting was held at City Hall focusing on the principle of development, urban design, housing and transport.

30 The GLA's pre-application advice report of 4 December 2015 stated that, whilst the residential-led redevelopment of the site within the Charlton Riverside Opportunity Area could be supported in principle, GLA officers required a further understanding of the Council's emerging masterplan principles for the Opportunity Area, in order to be able to appropriately assess the proposals within the changing land use and urban design context. At that time, this information had not been made available to the GLA and the applicant was strongly encouraged to engage with the Council to ensure the proposals developed in a cohesive manner. GLA officers welcomed continued dialogue with the applicant as the development progressed further.

31 A series of further pre-application meetings were held with the applicant throughout 2016 to discuss revisions to the proposed design and layout in response to emerging Charlton Riverside SPD masterplan principles and officer comments. GLA officers issued further formal pre-application advice on 28 November 2016 setting out that the detailed design of the scheme had evolved positively in response to previous advice from GLA officers and sought, further engagement on the affordable housing offer and energy strategy, as well as further work to address various transport matters.

32 Stage 1: On 11 January 2017, the Mayor of London received documents from Greenwich Council notifying him that a planning application had been submitted that was of potential strategic importance, referring it under Categories 1A, 1B(c) and 1C of the Schedule to the Order:

- 1A – *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B(c) – *Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside of Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C – *“Development which comprises or includes the erection of a building more than 30 metres high outside the City of London.”*

33 The original submission of the planning application comprised a taller and higher density mixed-use scheme consisting of 975 residential units in buildings ranging from 9 to 28 storeys in height, albeit the general plot layout principles were similar in nature to the currently proposed scheme. With regards to non-residential uses, the proposals also included 1,560 sq.m. of B1 use class office space, 690 sq.m. of flexible retail/restaurant/café/leisure floorspace, and 407 sq.m. of community floorspace.

34 On 20 February 2017, the Mayor of London considered a GLA planning report reference: D&P/3800/01. The report advised Greenwich Council that the application did not fully comply with the London Plan and issues around employment, housing and affordable housing, urban design, inclusive design, sustainable development and transport should be addressed; however, it noted that the principle of the residential-led, mixed-use development of this site that would deliver a significant quantum of new homes within the Charlton Riverside Opportunity Area was supported.

35 Following the receipt of consultation responses, the applicant revised the application to respond to the issues raised. In December 2017 the applicant submitted revisions to Greenwich Council, reducing the number of residential units from 975 to 771, in addition to removing the 28 storey tower and other amendments to building heights, massing and layout across the site. A further set of revisions were subsequently submitted in February 2018 comprising a reduction in height of Building H on Plot A to three storeys, and increase in height of Buildings C, E and F by one storeys, amendments to address overlooking and privacy between buildings, minor changes to the residential mix and an increased affordable housing offer. Public consultation has been carried out to take account of the revisions and public exhibitions were held by the applicant in March 2018.

36 On 17 April 2018, Greenwich Council's Planning Board deferred the application to allow for a Members' site visit to be undertaken. This subsequently took place on 7 June 2018.

37 On the 9 July 2018 Greenwich Council, against officer recommendation, resolved to refuse planning permission for the application. It is noted the decision to refuse the application was against officers' recommendation, and, on 31 July 2018, the Council advised the Mayor of this decision. The Council's draft decision notice includes the following reasons for refusal:

- i. Due to the excessive height of the buildings, together with their massing and design, the proposed development would result in the overdevelopment of the site and would fail to adhere to the vision for the redevelopment of the area set out in the Charlton Riverside SPD 2017. As such the proposal is contrary to policies 3.4, 3.5, 7.4, 7.6 and 7.7 of the London Plan (2016) and policies H5, DH1 and DH2 of the Royal Greenwich Core Strategy with detailed Policies (2014) and the guidance set out in the Charlton Riverside SPD 2017.
- ii. The proposed proportion of family sized housing falls below that envisaged by the Charlton Riverside SPD 2017 and the application fails to demonstrate that the amount of family sized housing within the development has been maximised. The proposal is therefore contrary to policy H5 of the Royal Greenwich Core Strategy with detailed Policies (2014) and policy 3.8 of the London Plan (2016).
- iii. The proposed development would fail to provide a safe and convenient vehicular access to the adjacent business premises at Imex House and, in the absence of a satisfactory scheme of soundproofing to Imex House, would introduce noise sensitive uses to the site with the potential to create conflict between the existing business and future occupants of the development. The proposed development is therefore contrary to policies DH1 and E(a) of the Royal Greenwich Core Strategy with detailed Policies (2014) and policies 7.6 and 7.15 of the London Plan 2016.
- iv. The proposed development would result in the loss of existing employment floorspace and fails to make appropriate replacement employment floorspace provision which meets the needs of and which is affordable to small and medium sized businesses in the area. The proposal is therefore contrary to policy EA1 of the Royal Greenwich Core Strategy with detailed Policies (2014) and the guidance provided by the Charlton Riverside SPD 2017 (in particular section 5.4).
- v. Due to the height of the proposed buildings and their proximity to existing residential properties the proposed development would result in an unacceptable reduction in daylight and overshadowing of external amenity spaces to properties in Atlas Gardens and Anchor and Hope Lane as well as a loss of privacy to properties in Derrick Gardens, Atlas Gardens and Anchor and Hope Lane through overlooking. In addition the proposal fails to provide adequate levels of internal daylight and sunlight to the proposed residential units within the development. As such the proposal would adversely affect the amenity of neighbouring

occupiers and would provide a poor quality living environment for future occupants of the development contrary to policy 7.6 of the London Plan (2016) and policies DH(b) and H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies July 2014.

38 Stage 2: On 13 August 2018, the Mayor considered a GLA planning report reference GLA/3800/02. The report concluded that, having regard to the details of the application, the development was of such a nature and scale that it would have a significant impact on the implementation of the London Plan, and there are sound planning reasons for the Mayor to intervene in this case and issue a direction under Article 7 of the Order that he would act as the Local Planning Authority for the purpose of determining the application. The report identified that there were outstanding matters that needed to be resolved, including issues pertaining to affordable housing, urban design, climate change and transport. The Mayor agreed this recommendation.

39 Since the direction was issued, GLA officers have worked with the applicant to amend the application to address the Council's reasons for refusal and matters raised at Stage 1 and 2. Revised plans were submitted by the applicant on 3 December 2018. The amendments are set out above and discussed in the relevant sections of this report.

40 Re-consultation on amended plans: A 42-day re-consultation was carried out on 3 December 2018, notifying interested parties on proposed amendments by the applicant to plans and documents in relation to the amendments outlined above. While it is noted that the 21 day statutory requirement expired before Christmas, the re-consultation was extended beyond the statutory requirement to allow interested parties the maximum amount of time to respond and to accommodate a public viewing of the amendments.

41 Site visit: The Mayor will undertake an accompanied site visit in advance of the representation hearing with GLA and TfL officers, representatives of the Council, and the applicant team.

Relevant legislation, policies and guidance

42 In determining this application, the Mayor must determine the application for planning permission in accordance with the requirement of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. In particular, the Mayor is required to determine the application in accordance with the development plan unless material considerations indicate otherwise.

43 For the purposes of Section 38(6), the development plan for the area comprises the following documents: Greenwich Core Strategy with Detailed Policies Development Plan Documents 2014 (collectively forming the 'Greenwich Local Plan' and referred to accordingly hereafter); and the London Plan (2016, consolidated with alterations since 2011).

44 On 1 December 2017, the Mayor published his draft London Plan for public consultation, which closed on 2 March 2018. On 13 August 2018, the Mayor published a version of the draft Plan that includes his minor suggested changes. This must be taken into account, but the weight attached to the draft Plan must reflect its stage of preparation, in accordance with the guidance set out within the NPPF paragraph 48.

45 The Mayor is also required to have regard to national planning policy in the form of the Revised National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), as well as supplementary planning documents and, depending on their state of advancement, emerging elements of the development plan and other planning policies. A full list of supplementary planning documents and guidance is set out below. However, the following is SPD,

which is specific to the area in which the application site is located, is considered to be particularly material:

- Charlton Riverside Masterplan Supplementary Planning Document (June 2017).

46 The principal relevant material planning considerations which arise in the context of the current application are: land use principles (including industrial land, housing, and employment); housing (including affordable housing, housing tenure, mix, density and housing quality) urban design (including layout, landscaping, height and massing, architectural quality and appearance, heritage, fire safety and designing out crime); inclusive design; neighbouring amenity impacts (including privacy/overlooking; noise/disturbance); natural environment; sustainability (including climate change mitigation and adaptation, including sustainable drainage); other environmental considerations (including air quality, contaminated land and waste management); transport, and; mitigating the impact of development through planning obligations and conditions. The relevant planning policies and guidance at the national, regional and local levels are as noted in the following paragraphs.

National planning policy and guidance

47 The National Planning Policy Framework (NPPF) provides the Government's overarching planning policy, key to which, is a presumption in favour of sustainable development. First published in 2012, the Government published a revised NPPF in July 2018. The NPPF defines three dimensions to sustainable development: an economic objective contributing to building a strong, responsive and competitive economy; a social objective supporting strong, vibrant and healthy communities; and, an environmental objective contributing to protecting and enhancing our natural, built and historic environment. The relevant components of the NPPF are:

- 2. Achieving sustainable development
- 4. Decision-making
- 5. Delivering a sufficient supply of homes
- 6. Building a strong, competitive economy
- 7. Ensuring the vitality of town centres
- 8. Promoting healthy and safe communities
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Natural environment
- 16. Conserving and enhancing the historic environment

48 The National Planning Practice Guidance is also a material consideration.

Spatial Development Plan and guidance

49 The London Plan 2016 is the Spatial Development Strategy for Greater London. It forms part of statutory development plan for the purposes of s70(2) of the 1990 Act and s.38 (6) of the 2004 Act.

50 The NPPF paragraph 213 explains that "due weight" should be given to existing policies in development plans "according to their degree of consistency with this Framework." Thus, the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given to them.

- Policy 1.1 Delivering the strategic vision and objectives for London;
- Policy 2.3 Growth areas and co-ordination corridors;
- Policy 2.9 Inner London;
- Policy 2.13 Opportunity area and intensification areas;
- Policy 2.14 Areas for regeneration;
- Policy 2.17 Strategic Industrial Locations
- Policy 2.18 Green infrastructure;
- Policy 3.1 Ensuring equal life chances for all;
- Policy 3.2 Improving health and addressing health inequalities;
- Policy 3.3 Increasing housing supply;
- Policy 3.4 Optimising housing potential;
- Policy 3.5 Quality and design of housing developments;
- Policy 3.6 Children and young people’s play and informal recreation facilities;
- Policy 3.7 Large residential developments;
- Policy 3.8 Housing choice;
- Policy 3.9 Mixed and balanced communities;
- Policy 3.10 Definition of affordable housing;
- Policy 3.11 Affordable housing targets;
- Policy 3.12 Negotiating affordable housing;
- Policy 3.13 Affordable housing thresholds;
- Policy 4.1 Developing London’s economy;
- Policy 4.2 Offices
- Policy 4.3 Mixed use development and offices;
- Policy 4.4 Managing industrial land and premises;
- Policy 4.7 Retail and town centre development;
- Policy 4.9 Small shops
- Policy 4.12 Improving opportunities for all;
- Policy 5.1 Climate change mitigation;
- Policy 5.2 Minimising carbon dioxide emissions;
- Policy 5.3 Sustainable design and construction;
- Policy 5.4A Electricity and gas supply;
- Policy 5.5 Decentralised energy networks;
- Policy 5.6 Decentralised energy in development proposals;
- Policy 5.7 Renewable energy;
- Policy 5.9 Overheating and cooling;
- Policy 5.10 Urban greening;
- Policy 5.11 Green roofs and development site environs;
- Policy 5.12 Flood risk management;
- Policy 5.13 Sustainable drainage;
- Policy 5.14 Water quality and wastewater infrastructure;
- Policy 5.15 Water use and supplies;
- Policy 5.17 Waste capacity;
- Policy 5.18 Construction, excavation and demolition waste;
- Policy 5.21 Contaminated Land;
- Policy 6.1 Strategic approach;
- Policy 6.2 Providing public transport capacity and safeguarding land for transport;
- Policy 6.3 Assessing the effects of development on transport capacity;
- Policy 6.4 Enhancing London’s transport connectivity;

- Policy 6.5 Funding Crossrail and other strategically important transport infrastructure;
- Policy 6.7 Better streets and surface transport;
- Policy 6.9 Cycling;
- Policy 6.10 Walking;
- Policy 6.11 Smoothing traffic flow and tackling congestion;
- Policy 6.12 Road network capacity;
- Policy 6.13 Parking;
- Policy 6.14 Freight;
- Policy 7.1 Lifetime neighbourhoods;
- Policy 7.2 An inclusive environment;
- Policy 7.3 Designing out crime;
- Policy 7.4 Local character;
- Policy 7.5 Public realm;
- Policy 7.6 Architecture;
- Policy 7.7 Location and design of tall and large buildings;
- Policy 7.8 Heritage assets and archaeology;
- Policy 7.13 Safety, security and resilience to emergency;
- Policy 7.14 Improving air quality;
- Policy 7.15 Reducing noise and enhancing soundscapes;
- Policy 7.19 Biodiversity and access to nature;
- Policy 7.21 Trees and woodlands;
- Policy 7.26 Increasing the use of the Blue Ribbon Network for freight;
- Policy 7.29 The River Thames;
- Policy 8.2 Planning obligations; and,
- Policy 8.3 Community Infrastructure Levy.

51 The draft London Plan was published for consultation on 1 December 2017, with Minor Suggested Changes published on 13 August 2018. This must be taken into account in the determination, but the weight attached to the draft Plan must reflect that approach set out in the NPPF paragraph 48. This provides that planning decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the NPPF. The following policies are considered to be relevant:

- Policy GG1 Building strong and inclusive communities;
- Policy GG2 Making best use of land;
- Policy GG3 Creating a healthy city;
- Policy GG4 Delivering the homes Londoners need;
- Policy GG5 Growing a good economy;
- Policy GG6 Increasing efficiency and resilience;
- Policy SD1 Opportunity Areas;
- Policy SD10 Strategic and local regeneration;
- Policy D1 London's form and characteristics;
- Policy D2 Delivering good design;
- Policy D3 Inclusive design;
- Policy D4 Housing quality and standards;
- Policy D5 Accessible housing;
- Policy D6 Optimising housing density;

- Policy D7 Public realm;
- Policy D8 Tall Buildings;
- Policy D9 Basement development;
- Policy D10 Safety, security and resilience to emergency;
- Policy D11 Fire Safety;
- Policy D12 Agent of change;
- Policy D13 Noise;
- Policy H1 Increasing housing supply;
- Policy H3 Monitoring housing targets;
- Policy H5 Delivering affordable housing;
- Policy H6 Threshold approach to applications;
- Policy H7 Affordable housing tenure;
- Policy H12 Housing size mix;
- Policy S4 Play and informal recreation;
- Policy E1 Offices;
- Policy E2 Low-cost workspace;
- Policy E4 Land for industry, logistics and services;
- Policy E5 Strategic Industrial Locations;
- Policy E7 Intensification and co-location of industrial land;
- Policy E9 Retail, markets and hot food takeaways;
- Policy E11 Skills and opportunities for all;
- Policy HC1 Heritage conservation and growth;
- Policy G1 Green infrastructure;
- Policy G4 Local green and open space;
- Policy G5 Urban greening;
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodland;
- Policy SI1 Improving air quality;
- Policy SI2 Minimising greenhouse gas emissions;
- Policy SI3 Energy infrastructure;
- Policy SI4 Managing heat risk;
- Policy SI5 Water infrastructure;
- Policy SI7 Reducing waste and promoting a circular economy;
- Policy SI8 Waste capacity and net waste self-sufficiency;
- Policy SI12 Flood Risk Management;
- Policy SI13 Sustainable drainage;
- Policy SI14 Waterways – strategic role;
- Policy T1 Strategic approach to transport;
- Policy T2 Healthy streets;
- Policy T3 Transport capacity, connectivity and safeguarding;
- Policy T4 Assessing and mitigating transport impacts;
- Policy T5 Cycling;
- Policy T6 Car parking;
- Policy T6.1 Residential parking;
- Policy T6.2 Office parking;
- Policy T6.3 Retail parking;
- Policy T6.5 Non-residential disabled persons parking;
- Policy T7 Freight and servicing;

- Policy T9 Funding transport through planning; and
- Policy DF1 Delivery of the plan and planning obligations.

52 The following published strategic supplementary planning guidance (SPG), strategies and other documents are also relevant:

- Affordable Housing and Viability SPG (August 2017), which must be considered in the context of the decision in R(McCarthy & Stone) v. Mayor of London.
- Crossrail Funding (March 2016)
- Housing SPG (March 2016, as amended);
- Social Infrastructure SPG (May 2015);
- Accessible London: achieving an inclusive environment SPG (October 2014);
- The control of dust and emissions during construction and demolition SPG (July 2014);
- Shaping Neighbourhoods: character and context SPG (June 2014);
- Sustainable Design and Construction SPG (April 2014);
- Shaping Neighbourhoods: play and informal recreation SPG (September 2012);
- All London Green Grid SPG (March 2012);
- Mayor's Housing Strategy (May 2018);
- Mayor's Transport Strategy (March 2018);
- Mayor's Environment Strategy (May 2018).

Local planning policy and guidance

Greenwich

53 Greenwich's Core Strategy with Detailed Policies (2014), provide the local policy approach for the borough. The relevant policies are:

- Policy H1 New Housing
- Policy H2 Housing Mix
- Policy H3 Affordable Housing
- Policy H5 Housing Design
- Policy H(e) Children's Play Areas
- Policy EA1 Economic Development
- Policy EA2 Charlton Riverside
- Policy EA4 Strategic Industrial Locations
- Policy EA(c) Skills and Training
- Policy DH1 Design
- Policy DH2 Tall Buildings
- Policy DH3 Heritage Assets
- Policy DH(b) Protection of Amenity for Adjacent Occupiers
- Policy DH(e) Shopfronts and Signs
- Policy DH(g) Local Views
- Policy DH(h) Conservation Areas i) Character and Setting
- Policy DH(i) Statutory Listed Building Protection of Listed Buildings
- Policy DH(j) Locally Listed Buildings i) Protection of Listed Buildings
- Policy DH(k) Thames Policy Area
- Policy DH(m) Archaeology
- Policy OS4 Biodiversity

- Policy OS(c) Open Space Deficiency
- Policy OS(f) Ecological Factors
- Policy E1 Carbon Emissions
- Policy E2 Flood Risk
- Policy E(a) Pollution
- Policy E(c) Air Pollution
- Policy E(e) Contaminated Land
- Policy E(f) Living Roofs and Walls
- Policy CH1 Cohesive Communities
- Policy CH2 Healthy Communities
- Policy IM1 Infrastructure
- Policy IM4 Sustainable Travel
- Policy IM5 Freight
- Policy IM(a) Impact on the Road Network
- Policy IM(b) Walking and Cycling
- Policy IM(c) Parking Standards
- Policy IM(d) London City Airport

56 As explained above, “due weight” should be given to these existing policies according to their degree of consistency with the NPPF.

Supplementary planning guidance (SPG) and supplementary planning documents (SPD)

57 The following adopted Greenwich Council SPDs and SPG are also relevant to the proposal:

- Royal Borough of Greenwich Planning Obligations SPG (February 2008); and,
- Charlton Riverside Supplementary Planning Document (June 2017).

Community Infrastructure Levy

58 London borough councils are able to introduce Community Infrastructure Levy (CIL) charges which are payable in addition to the Mayor’s CIL (which sets a charging rate of £35 per sq.m. in the Royal Borough of Greenwich). Greenwich Council’s CIL came into effect on 6 April 2015.

59 The Greenwich CIL charging schedule splits the borough into 2 zones with the application site falling within Zone 1. The Greenwich CIL charging schedule sets a variable rate for residential uses with the CIL rate in Zone 1 £70 per sq.m. There are no charges set out for the other uses included within the scheme.

Response to consultation

60 Greenwich Council has publicised the application locally. In addition, the GLA has carried out consultation on revised plans that were submitted subsequent to the Mayor taking over the application, and comments received are outlined below.

Initial consultation

61 The application was subject to three rounds of public consultation following its submission to Greenwich Council and was publicised by notifying approximately 1,000 properties by letter, as well as issuing site and press notices. Public exhibitions were also held by the applicant in March

2018. The Council received 90 responses from local residents and businesses, 83 of which were in objection and 7 in support.

62 The grounds for objection included the lack of affordable housing; non-compliance with the Charlton Riverside Masterplan SPD; low level of family housing; lack of play space; excessive height and density; heritage impact; poor design; prematurity and piecemeal development; loss of business space; object to new retail; lack of green space; sustainability; could impact on wharves; impact on infrastructure and schools/health facilities; impact on adjacent recording studio and business uses; traffic congestion and poor air quality; construction impact; too much parking; impact on neighbouring parking and public transport; daylight and overlooking impact; subsidence and flood damage risk; drainage problems; noise nuisance; and increased security risk.

63 The support comments welcomed new housing; the masterplan; enhanced use of the river; reduction in height since original submission; the proposed green space; the improved public realm and the potential to be a catalyst for wider regeneration.

64 **Matthew Pennycook MP** objected on the grounds of excessive height and massing, design, affordable housing, housing mix and excessive parking.

Statutory consultee responses

65 The following statutory consultees also commented:

- **Environment Agency:** No objection, subject to a condition requiring a basement evacuation strategy and protection to ground water.
- **Historic England:** Application should be determined in accordance with local conservation advice.
- **Network Rail:** Subject to further detailed assessment, raised concerns over the current capacity of local rail stations to accommodate growth in the area and advised that residential development in vicinity of the aggregates depot must not prejudice its existing use and operation. As set out in the transport section of this report, the trip generation for rail has been assessed by Transport for London and the impact from this development is expected to be minor and is acceptable.
- **Natural England:** No objection in relation to statutory protected sites, standing advice should be referred to and biodiversity enhancements secured.
- **London City Airport:** No objection, request consultation on the use of cranes.
- **Port of London Authority:** Concern over noise impact from aggregates wharf.
- **Historic England (Archaeology):** Raised no objections subject to archaeological investigation conditions. No further assessment or conditions considered necessary.
- **Sport England:** Requested contributions towards sports facilities and new walking and cycling routes within the scheme.
- **NHS Greenwich CCG:** Request for health facilities to be incorporated into the masterplan to serve the wider area, with a preference for a single facility.
- **Metropolitan Police:** Request condition requiring the development to meet Secured by Design standards and a request for space to be made available for Police use.
- **London Fire & Emergency Planning Authority:** Satisfied with the proposals.

- **Thames Water:** Conditions requested regarding waste water, water supply, surface water drainage and piling.
- **Scotia Gas Networks:** Objected pending detailed assessment. No further update was received.
- **UK Power Networks:** Confirmed location of cables and advised on safe digging practices.
- **Zayo Group UK (fibre optic cables):** Confirmed location of apparatus and advised on need for trail digging and diversionary works.

Local amenity groups

66 The following local amenity groups have raised objections:

- **Charlton Society:** Welcome the efforts to amend the scheme, but still concerned about disregard for the SPD masterplan, building heights, impact on local views and urban landscape, contribution to place-making, density, affordable housing, family housing, green spaces, community facilities, shopping facilities, traffic impact and sustainability.
- **Charlton Central Residents' Association:** Raises concerns over lack of affordable and family housing, height and design quality, lack of contribution to infrastructure and undermining the SPD masterplan vision.
- **Greenwich Conservation Group:** Concerned that the proposals are a departure from the SPD and set a bad precedent for future development, excessive building height and density, poor residential and open space quality, impact on local views, low affordable and family housing.
- **Derrick and Atlas Gardens Residents' Association:** Object to departure from the SPD masterplan, building heights, impact on conservation area, loss of light and privacy, lack of parking, lack of family housing, impact on schools, impact on buses and trains, traffic, low affordable housing and affordability, low infrastructure contribution, air quality impact, barrier effect of east-west route, lack of integration with existing developments, excessive density and impact on community cohesion.
- **Transport for Charlton:** Raised concerns over impact on public transport, impact on health, education and other infrastructure, displacement of businesses and impact on economy and non-compliance with SPD.

67 Internal consultees: Greenwich borough officers have provided comments in relation to the environment, highways and transport, sustainability, housing, waste and pollution, inclusive design, social infrastructure, flood risk and historic environment. The points raised have been considered in the body of the report and are reflected in the suggested conditions.

Representations to the Mayor of London: Charlton Together, a network of Charlton residents and community groups, made representations directly to the Deputy Mayor for Planning, Regeneration and Skills, the Deputy Mayor for Housing and Residential Development and Nicky Gavron AM and Chair of the Planning Board in July 2018. The representations expressed the groups full support for Greenwich Council's resolution to refuse planning permission and forwarded representations previously submitted to Greenwich Councillors raising concerns with regards to the proposed height and density, design and the planning process in the Royal Borough of Greenwich more generally. In addition, an online petition containing 636 signatures addressed to the Council requesting it enforce the terms of the Charlton Riverside SPD was shared and a meeting was sought with GLA

officers to discuss the enclosed representations in more detail. The points raised have been considered in the body of the report and are reflected in the suggested conditions.

Re-consultation exercise

68 The planning application was called in by the Mayor on 13 August 2018. Since that time, a neighbourhood re-consultation exercise took place, between 3 December 2018 and 14 January 2019 for 42 days in relation to revisions to the scheme that had been updated since the previous consultation exercise. A total of 1,042 letters of notification were distributed to local addresses and those who previously commented. Press notices were posted in the 5 December 2018 edition of 'The Weekender'. Site notices were also erected on the site. The applicant also held a public viewing to explain the amendments in the Anchor and Hope public house on the 12 and 13 January 2019.

69 Responses: The Mayor and/or GLA officers have received 44 responses (42 in objection and 2 in support) as a result of the public consultation exercise. The majority of the objections reiterate concerns raised with the Council at the initial consultation stages, as detailed above. These responses have been made available to the Mayor for viewing and have been taken into account in this report.

70 In summary, the points raised in objections to the scheme can be broadly summarised as regarding:

- Object to consultation over Christmas period;
- Undermining local democracy;
- Inadequate public consultation;
- Height, scale and massing;
- Unacceptable high density;
- Overpopulation of the area;
- Non-compliance with Charlton Riverside masterplan principles (SPD);
- Creation of an unacceptable precedent;
- Daylight and sunlight impact on Atlas and Derrick Gardens;
- Privacy and overlooking of Atlas and Derrick Gardens;
- Loss of existing businesses and jobs;
- Impact on adjacent business premises;
- Impact on local community;
- Impact on heritage including Charlton Riverside Conservation Area;
- Impact on townscape;
- Amenity impacts on Atlas and Derrick Gardens;
- Light pollution;
- Air pollution;
- Impact on security of existing residential properties;
- Impact on local social infrastructure including education and medical facilities;
- Quality of proposed accommodation and amenity spaces;
- Lack of amenity space provision;
- Lack of family housing;
- Impact on transport network and highways;
- Insufficient infrastructure to support proposed housing;
- Lack of social rent and genuinely affordable housing;
- Architecture doesn't reflect industrial and maritime heritage of the area;
- Housing not for Londoners;
- Car parking provision;

- Potential for introduction of noise sensitive receptors in proximity of the nearby Safeguarded Wharves could impact their operations.

71 **Len Duvall, London Assembly Member for Greenwich and Charlton** has raised concerns about the precedent the proposed development could set as it does not meet the vision set out within the Charlton Riverside Masterplan and if approved would damage local democracy and the community's faith in the planning process. Concerns were also raised with regards to the proposed density and its impact on the local transport and other infrastructure, in addition to concerns with regards to the lack of family housing proposed. Finally, particular concerns were raised with regards to the impact of the proposed buildings on the residential amenity of residents of Atlas and Derrick Gardens and the building treatment.

72 **Councillor Gary Parker for Charlton Ward** made representations to the consultation raising objections on the grounds of overdevelopment and principally the lack of family housing proposed which does not meet the SPD target. Furthermore, the representations object to the height and scale of the development, in particular the 10 storey elements on Plot A and their relationship with existing residential properties at Atlas and Derrick Gardens and the Charlton Riverside Conservation Area. Concerns were also raised with the lack of consultation with local businesses and response to the need for space suitable for SME's in the local area. The representation concludes that the revisions are only minimal and do not reflect the Charlton character.

73 **Councillor David Gardner for Woolwich Common Ward** objected to the proposals principally on the grounds of the proportion of family housing proposed and reflected the objections made by Cllr Gary Parker. Cllr Gardner also raised concerns with regards to the provision of parking and emphasised that the proposals should be car-free with the exception of disabled parking, service vehicles and car club membership.

74 **Matthew Pennycook MP** made representations to Mayor in August 2018 following the decision to call-in the application reiterating the objections made to Greenwich Council referred to in the initial consultation section above and raising disappointment with the Mayor's intervention. The representation also requested that a reduction in massing, improved building design and reconsideration of the proposed levels of affordable housing and family housing be explored in any proposed amendments. Further representation were received in response to the revisions welcoming the proposed reductions in height, increase in cycle parking, and increase in affordable housing. Objections were maintained on the proposed divergence on the height and density guidance in the SPD and lack of building height variation, lack of family housing, proposed building design and quantum of car parking proposed that would contribute to local traffic congestion and parking pressure. Overall, the representations conclude that the scheme remains at odds with the height and density vision set out in the Charlton Riverside SPD (2017).

75 The objection to the revised scheme received from **Councillor Sarah Merrill Chair of Planning Board for Greenwich Council** notes that although there have been some reductions in height in parts of the scheme, the increase in height are considered to compound the Council's reasons for refusal. The representation concludes that the Council's reasons for refusal have not been sufficiently addressed by the amendments and should thus be refused under the same terms. GLA officers note that the representation acknowledges the need for the provision of new homes, but the contribution of the proposals to housing delivery is not such to outweigh the harm identified to the local community. The comment can be summarised under the headings below:

Housing delivery targets

- Based on the Council's Annual Monitoring Report 2016-17, the Council stated it has a deliverable five year housing land supply and identified developable sites for year 6-10 of the housing trajectory, demonstrating that the Council will meet its overall housing requirement over the 15 year period.
- The proposal would therefore not significantly affect housing delivery at a scale that would outweigh the harm caused by the issues raised with regards to overdevelopment, non-compliance with the Charlton Riverside SPD and amenity impacts.

Overdevelopment

- The height and scale of the revisions does not address the overall concerns with regards to height and results in less variation in massing and therefore remains unacceptable.
- Proposals do not achieve the human scale of the low to medium rise development envisaged by the SPD.

Density

- The proposed density for both development plots exceeds the SPD guidance and the recommended ranges set out in the London Plan and presents symptoms of overdevelopment.

Charlton Riverside Masterplan SPD vision

- The proposal deviates from the vision of the masterplan in terms of housing mix, and the scale and character of the development.

Housing mix

- It has not been demonstrated that family housing has been maximised and the proposals do not meet the 50% target set by the SPD. The proposed reduction in three and four bed units is not acceptable.

Impact on adjacent businesses

- The revised tracking diagram which demonstrates turning space can be accommodated is acknowledged. Concerns remain over whether continued access can be safely accommodated in close proximity to the proposed residential units without adversely impacting amenity.
- Should permission be granted a suitable scheme for soundproofing to Imex House would need to be secured by planning obligation, in addition to impact of construction noise to operation of the recording studio.

Loss of employment space

- Concerns remain over suitability of commercial space for SME's. It has not been demonstrated that the proposed floorspace would be suitable for the types of businesses currently operating in the area, including those displaced from the existing site, nor that it would be affordable to local businesses.

Amenity

- It is noted that the reductions have improved amenity impact on nearby properties, but the overall impact on amenity remains a serious concern. Impacts on privacy also remain.
- It is acknowledged that the overall levels of daylight within the proposed units has improved across the scheme, those that do not meet guidance will still provide inferior quality. This is unacceptable and indicative of overdevelopment.

76 In summary, the points raised in support of the scheme can be broadly summarised as regarding:

- Support the Mayor's intervention;
- Support the delivery of housing and affordable housing;
- Proposals would bring wider benefits to the area;
- The proposals would kick start the regeneration of the Opportunity Area.

77 The following local amenity groups made the following objections:

- **Charlton Together:** acknowledged that the proposed revisions have achieved some improvements but are not sufficient to address their main concerns centred around the scale of deviation from the SPD guidance and London planning targets, the adverse precedent planning consent will give for the whole riverside area, and the need to respect local democracy. Objections were also raised on the grounds of overdevelopment, particularly the proposed exceedance of locally set density guidance and lack of reduction in unit numbers; exceedance of SPD height guidance and that proposed redistribution of height has worsened local overshadowing; inadequate provision of family housing; loss of local employment; lack of green space, river access, and impact on local amenity; lack of building height variation and maritime character; support for local democracy and impact on the Conservation Area. The representations also support the Council's delivery against its Borough Plan housing targets.
- **Atlas and Derrick Gardens Residents Association:** following review of the amendments do not consider the revisions sufficient to address their concerns previously raised and consider them worse with respect to family housing delivery and increasing massing behind Atlas and Derrick Gardens. In addition, the representations consider that the site is not unique in its proximity to Anchor and Hope Lane and Charlton Station and its accessibility, with other sites nearby benefiting from the same geographical characteristics. Concerns were also raised with regards to air quality and sustainability. It is considered that the proposals do not act in the interest of all Londoners and will not reduce inequalities due to the affordability of the housing proposed in accordance with overarching aims of the draft London Plan. The amenity group would like to see a reduction in the total number of homes proposed, an increase in affordable housing to 50%, an increase in the proportion of family housing, maximum building heights capped at 6 storeys with only very limited exceptions, significant contributions towards improving the local transport network, education and health provision, delivery of a community meeting space, connected street network, financial support for measures to enhance social capital, environmental baseline studies, and design review to improve amenity impact on existing properties and improve amenity of proposed properties. The representations conclude that the proposals should be refused, and a precedent not be set for the rest of the masterplan area.

- **Charlton Society:** made additional representations adding to those submitted to Greenwich Council and detailed above. In particular objections were raised to the design response to the SPD objectives and that it does not reflect local identity, the river location or local topology, and requests that Greenwich Council's housing delivery figures are resolved prior to any public hearing. The representation concludes with regards to concerns on the erosion of local democracy with respect to the interpretation of the SPD.
- **Speak Out Woolwich:** object to the proposals on the grounds it fails to adhere to the masterplan with regards to height and massing; traffic, public transport and social infrastructure impact; amenity and social impact on Atlas and Derrick Gardens; inadequacy of genuinely affordable/social rented and family sized housing contrary to local policy and supports democratic decision making.
- **Positive Plumstead:** object to the proposed impact on local residents as a result of increased pressure on traffic, public transport infrastructure and social infrastructure. Further objections were made to the impact on local democracy, lack of affordable and family housing and impact of proposals on existing residents.

78 Statutory consultee responses received:

- **Historic England:** Made no comments with regards to designated heritage assets and recommended the scheme be assessed in consultation with GLA's own consultation advisers as relevant.
- **Historic England Greater London Archaeological Advisory Service (GLAAS):** Recommended a two stage archaeological investigation condition to evaluate and excavate, in addition to a condition securing a written scheme of investigation for geoarchaeological works and a public engagement condition. These have been secured.
- **Sport England:** Raised no objection to the proposals but highlighted that that more attention could have been given in the design process to encourage residents to be more physical active and take part in sport. In accordance with its Active Design guidance Sport England would encourage legible and connected walking and cycling routes through the site, the provision of high quality streets and spaces, and appropriate cycle storage and parking to encourage use. As set out within the following report, the proposed development provides these measures.
- **London Fire Brigade:** Raised no objections and confirmed that pump appliance and water supplies for the fire service appear adequate.
- **Environment Agency:** Raised no objections subject to conditions securing flood emergency plan, in addition to conditions regarding flood risk management, groundwater protection and contaminated land. These have been secured.
- **Scotia Gas Networks:** Provided no further representations.
- **Natural England:** Raised no objections based on the plans submitted and considered that the proposals would not have significant impacts on statutorily protected sites or landscapes.
- **Port of London Authority (PLA):** the application has still not demonstrated sufficient balcony mitigation to protect future occupants from noise emanating from the nearby Safeguarded Wharves, there is insufficient information regarding the acoustic performance

of glazing and ventilation, and there is a lack of assessment of internal noise for different ventilation/overheating options. These objections have all been previously raised. However, the PLA concurs that these three continued objections could be overcome if the proposed noise conditions (Conditions 88 and 89), as previously agreed and put forward by the Council are applied in full. These have been secured. Planning conditions were also requested to ensure that the proposed development during construction and operation must not restrict cargo operations handling at the Wharves due to increased traffic movements and exploring opportunities for the development to increase the use of the Blue Ribbon Network for freight transport. These provisions have been secured by condition.

Representations summary

79 All the representations received in respect of this application have been made available to the Mayor however; in the interests of conciseness, and for ease of reference, the issues raised have been summarised in this report as detailed above.

80 The main issues raised by the consultation responses, and the various other representations received, are addressed within the material planning considerations section of this report, and, where appropriate, through the proposed planning conditions, planning obligations and/or informatives outlined in the recommendation section of this report.

Material planning considerations

81 Having regard to the site and the details of the proposed development, relevant planning policy at the local, regional and national levels; and, the consultation responses and representations received, the principal planning issues raised by the application that the Mayor must consider are:

- Land use principles (including Opportunity Areas, housing, industrial land, employment, and commercial uses);
- Housing (including affordable housing, housing tenure, mix, density and housing quality);
- Urban design (including layout, landscaping, height and massing, architectural quality and appearance, heritage, fire safety and designing out crime);
- Inclusive design;
- Neighbouring amenity impacts (including privacy/overlooking; noise/disturbance);
- Natural environment;
- Sustainability (including climate change mitigation and adaptation, including flood risk and sustainable drainage);
- Other environmental considerations (including air quality, contaminated land and waste management),
- Transport, including parking provision and;
- Mitigating the impact of development through planning obligations and conditions.

82 These issues are considered within the following sections of the report.

Land use principles

83 Paragraph 11 of the revised NPPF promotes a presumption in favour of sustainable development and identifies a core set of land use planning principles, which should underpin both plan-making and decision-taking. The following are of particular relevance to the principle of development on the site:

- Deliver a sufficient supply of homes through significantly boosting house building, having regard to the specific housing needs of certain groups and provide on-site affordable housing to meet identified need;
- Build a strong and competitive economy through creating conditions where businesses can invest, expand and adapt and through recognising and addressing specific locational requirements of different sectors;
- Promote healthy and safe communities, through planning policies and decisions that aim to achieve healthy, inclusive and safe places;
- Promote sustainable transport modes through focusing significant development in locations that are, or can be made, sustainable through limiting need to travel and offering a genuine choice; and
- Make an effective use of land through maximising the use of previously-developed or 'brownfield' land.

84 The site lies within the Mayor's Charlton Riverside Opportunity Area. At a local level, Greenwich Council recognise the area as a Strategic Development Location, within its local policy documents. The principle of the redevelopment of the site must be considered in the context of the London Plan, draft London Plan and Greenwich Council Local Plan policies relating to the above designations as well as the NPPF, together with other policies relating to industrial land, mixed-use development, residential and commercial uses.

Industrial land and employment

85 Charlton Riverside is currently predominantly characterised by industrial uses, however, the existing industrial operations that operate on the application site and within its immediate context are not safeguarded by a policy designation. The draft London Plan defines the site as a Non-Designated Industrial Site. London Plan Policy 4.4 supports the managed release of surplus industrial land and Policy E7 Part D of the draft London Plan supports mixed-use or residential development proposals on Non-Designated Industrial Sites subject to a number of criteria, including where it has been allocated in a Development Plan for residential or mixed-use development.

86 Policy EA(a) of the Greenwich Core Strategy seeks to maximise the contribution to employment in Royal Greenwich from sites in existing or previous employment use and sets out the criteria which limit the circumstances in which non-employment uses will be permitted on employment sites. However, as set out in supporting paragraph 4.2.30, this policy is not applicable to sites within the Charlton Riverside Strategic Development Location as the area is to undergo comprehensive change in line with the adopted Masterplan SPD.

87 In light of the above, Greenwich Core Strategy Policy EA2 sets out that employment space in Charlton Riverside will be consolidated to maximise the efficient use of land to address strategic and local objectives, whilst maintaining employment levels in the area, in addition to facilitating a change in the type of employment. This is also reflected in the employment aspirations of the Charlton Riverside SPD (2017) which seeks to deliver an additional 4,000 jobs over and above the existing employment levels by integrating employment into new developments. The SPD goes further and identifies the application site as being partly within a new predominantly residential area and partly within a new Neighbourhood Centre including commercial and community uses. Section 5.4 of the SPD also states that managed workspace and accommodation suitable for start-up enterprises and small to medium enterprises (SMEs) will be actively pursued in any development proposals. This policy position supports the release of the site from industrial use, in principle.

88 The application site currently comprises low rise industrial buildings occupied by over twenty separate businesses operating in a range of B2 and B8 uses. These existing operations include storage and distribution, vehicle repair/MOT testing, vehicle spraying, manufacturing, vehicle hire and scaffolding supply, and amount to 6,341 sq.m. of floorspace, in addition to external storage and

parking. The site currently supports 90 full time jobs and while the exact split in land use is not known, when based on an equal split between B2 and B8 uses and employment density guidance, the existing floorspace could support a total of 121 jobs, or if 100% of the floorspace was in B2 use, it could theoretically support 178 jobs.

89 The proposals include the provision of 3,097 sq.m. of flexible workspace and 149 sq.m. of flexible retail floorspace, use class A1-A5 (please see paragraph 102 for clarification on quantum of retail floorspace). Notwithstanding the above, the proposals would therefore result in a net loss of employment floorspace, with the existing uses needing to relocate. The loss of employment floorspace is cited within the Council's reasons for refusal, in particular, it was considered that the development failed to make appropriate replacement employment floorspace provision which meets the needs of, and which is affordable to, small and medium sized businesses in the area.

90 As set out above, the Council's policy framework, recognises it will be necessary to consolidate existing employment uses in Charlton Riverside and for employment uses to be integrated into new developments. The applicant has committed to a business relocation strategy comprising a subsidised and bespoke agency package to assist existing tenants with finding suitable alternative premises. This will include an electronic liaison service to link existing tenants with active commercial agents in the immediate area, communication to all tenants of suitable instructions for available units and professional advice and assistance in negotiating terms on new premises, including recommendations of reputable local solicitors. Furthermore, the package offers flexible rolling tenancies to tenants to allow them to vacate once they have secured new premises, in addition to identifying opportunities to relocate tenants from early phases into vacant units in later phases, if suitable and feasible with the construction programme. These provisions will be secured in detail within the section 106 agreement and in light of the existing availability of industrial land in the area and that the proposed non-residential uses reflect the Council's Local Plan and masterplan land use objectives for this location, are considered reasonable to address the requirements to support the relocation for existing businesses as set out in Policy E7 of the draft London Plan. While it is acknowledged that not all of the existing tenants may relocate as a result of these provisions, the overall employment benefits of the development, including the proposed workspace that is capable of supporting higher employment densities and will be suitable for occupation by Small to Medium Enterprises (SME's), would outweigh any such impact. These are discussed in further detail below.

91 Notwithstanding the above, as set out in the socio economics chapter of the Environmental Statement Addendum 2018, based on Homes and Communities Agency density guidance, the proposed commercial and retail workspace could support up to 213 full time equivalent jobs. This represents a potential net increase of 123 jobs over the existing provision on site, and an increase of 35 jobs over the maximum potential number of jobs the existing floorspace could support and responds positively to the SPD objectives to deliver an additional 4,400 new jobs above the existing employment levels in the Opportunity Area. It is also recognised that the provision of flexible workspace is identified in the SPD as the preferred non-residential use in this location.

92 While the proposals will result in a net loss of employment floorspace, new employment generating uses will be reprovided on site that can support higher job densities and align with the Local Plan and SPD land use objectives for this location and would not result in the net loss of employment potential on site. Furthermore, the Council's policy framework recognises that it will be necessary to consolidate employment uses in Charlton Riverside and therefore the proposal reflects the Council's aspirations to deliver new types of employment within a regenerated Charlton Riverside and accords with the plan-led approach to managing industrial land set out in London Plan 4.4 and Policy E7 of the draft London Plan, and generally accords with Local Plan policies EA(a) and EA2. The proposed consolidation of employment floorspace on site will also enable other strategic policy objectives to be delivered through mixed-use development, in particular the delivery of a significant quantum of affordable housing.

93 In addition to the above, the workspace strategy has been developed in consultation with existing workspace providers and is purposefully designed to be flexible in nature and can be subdivided to suit the individual space requirements of different tenants. The applicant has committed to entering into a long lease with a workspace provider who would manage the workspace and to agreeing an affordable price point for both the provider and target end users. Any rent increases would be linked to the Retail Price Index and the applicant has also committed to co-designing the space with the workspace provider, including support for the fit out costs, to ensure it meets its requirements and maximises flexibility and attractiveness to SME's. These provisions, in addition to a detailed marketing strategy, will be secured through a local workspace strategy secured within the section 106 agreement.

94 On the basis of the above provisions, marketing strategy and management arrangements to be secured by planning obligation, GLA officers are satisfied that the proposed workspace will be suitable for SME's and suitably addresses the Council's reason for refusal on this ground.

Opportunity Area

95 As set out above, the site is located within the Charlton Riverside Opportunity Area. London Plan Policy 2.13 states that development in Opportunity Areas is expected to optimise residential and non-residential outputs and contain a mix of uses. London Plan paragraph 2.58 states that Opportunity Areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility, which is echoed in the supporting text to draft London Plan Policy SD1. Paragraph 2.61 of the London Plan confirms that Opportunity Areas are expected to make particularly significant contributions towards meeting London's housing needs. The draft London Plan identifies this Opportunity Area as being within the Thames Estuary corridor, which comprises the largest concentration of Opportunity Areas within the City and an area that continues to be a priority for regeneration and economic development, with the potential for the delivery of over 250,000 new homes and 200,000 new jobs.

96 London Plan Policy 2.13 identifies the Charlton Riverside Opportunity Area as having capacity to accommodate a minimum of 3,500 homes and 1,000 jobs. Through draft London Plan Policy SD1 this is revised to a minimum of 8,000 homes and 1,000 jobs. Draft London Plan Policy SD1 identifies Opportunity Areas as the capital's most significant locations for development capacity and seeks to ensure that this capacity is delivered in a sustainable and integrated way to ensure the successful delivery of the growth targets outlined above. The proposed residential, commercial and community uses are complimentary to the strategic policy context of the site and would enhance the residential and employment offer in Charlton Riverside. High density residential-led redevelopment of this previously developed site is in conformity with the aspirations of the London Plan and draft London Plan, both for the Opportunity Area and generally, in this regard.

97 Paragraph 4.2.7 of the Local Plan identifies Charlton Riverside as a key regeneration area in a prime riverside location, that provides a significant opportunity for a new, high quality, mixed use urban quarter and will be enabled by the substantial release of under-used industrial land and the intensification of employment on remaining land to ensure no net loss of employment across the Royal Borough. This is embodied in Local Plan Policy EA2. These proposals contribute to the realisation of these core strategy aims through the proposed high quality, mixed-use redevelopment of the under-utilised, low density industrial site to deliver a significant quantum of new homes, including affordable housing, and a net increase in employment on site.

98 The Charlton Riverside SPD (2017) establishes a revised vision to substantially increase housing and employment delivery in the area and provides a set of development principles to achieve the regeneration objectives outlined above. Key objectives include the delivery of up to

7,500 new homes, in low to medium rise development, of which 50% should be family housing and 35% affordable housing, in addition to an extra 4,400 jobs over and above existing employment levels. The SPD identifies the central portion of the masterplan area, of which the application site is part of, as having the greatest development potential with it being envisaged that much of the existing commercial activity will be either replaced by mixed use or more intensive forms of commercial or industrial activity. It also identifies a new primary Neighbourhood Centre focussed on the southern stretch of Anchor and Hope Lane, and around the provision of a mix of retail, food and drink, commercial, leisure and community provision, as well as some employment space, that provides for the day-to-day needs of residents, employees and visitors to Charlton Riverside.

99 However, it is acknowledged significant strategic transport infrastructure enhancements, coupled with improved north-south and east-west connectivity and permeability throughout the masterplan area, is fundamental to unlocking the significant development potential of the Opportunity Area. In this regard, in addition to a new secondary and tertiary movement network reflecting potential development plots, the SPD identifies a new, primary east-west transit route through the masterplan area, and application site, linking Anchor and Hope Lane and Bugsby's Way through to the eastern extent of the masterplan area.

100 The Local Plan also identifies the application site as being within an Area of Open Space Deficiency and Local Plan OS (c) seeks to increase provision and public access in such areas. This is recognised within the SPD which seeks to address this deficiency through the provision of green infrastructure, including outdoor space and links between open space. The guidance places specific emphasis on the provision of accessible, multifunctional open space provided in close proximity to residential development, in addition to finer grain provision within development parcels such as pocket parks, rain gardens, local play areas and civic spaces, providing very immediate and instantly accessible open space adjacent to residential development. It is noted that the proposed 'eco walk' between Atlas and Derrick Gardens is identified as a green link within the SPD open space proposals and that the site responds positively to the area-wide proposals for new public open space to support new and existing residents.

101 The proposals seek to redevelop the current low density, industrial site and introduce a high quality mixed-use development including a significant quantum of residential development, including affordable housing, and a net increase in employment. The proposals for Plot A comprise predominantly residential development, with ancillary amenity spaces, creche and community facilities, and on Plot B delivering flexible commercial and retail uses at ground floor with residential above, responding to the SPD objectives to create a new Neighbourhood Centre. Accordingly, the proposals have appropriately recognised the guidance of the SPD in layout and landuse terms. The proposals also contribute towards the new east-west transit route, as well as providing other new public routes including a link to the Thames Path to be delivered as part of the proposed landscaping strategy which accords with the Local Plan Policy DH(k) objectives of enhancing links to the river, improving the local environment and enhancing the river foreshore for wildlife and nature conservation within the Thames Policy Area. As such, the application is considered to appropriately address London Plan and Local Plan Policy regarding the Opportunity Area.

Other proposed uses

Retail

102 It is important to note that the floorspace schedule (doc reference 10046-A-SCH-Z0-G100-9010-PL) the Building O unit matrix (doc reference 10046-A-DRG-O-F900-2000-PL-RS) submitted under the December 2018 amendments incorrectly state that Building O will contain 183 sq.m. A1-A5 retail floorspace. This should correctly state 149 sq.m. retail floorspace and reflect the unit layouts shown in the submitted Plot B ground floor layout (doc reference 10046-A-DRG-Z2-G100-2000-PL-RS) and the Level 00 layout for Building O (doc reference 10046-A-DRG-O-G200-2000-

PL-RS). A revised floorspace schedule and unit matrix reflecting the correct floorspace figure and unit layout has since been provided and will be secured by planning condition.

103 The NPPF, London Plan Policy 4.7, draft London Plan SD6, Greenwich Policy EA1 all set out a town centre first approach to the provision of new town centre uses. The London Plan establishes that edge or out of centre retail development must be subject to an assessment of impact. To ensure the successful functioning of the site, the provision of 149 sq.m. of flexible retail floorspace is proposed at the ground floor Building O. The proposed retail use is intended to satisfy the localised need arising from the proposed new homes and to respond to masterplan aspirations for a new Neighbourhood Centre in this location. Given the limited scale of the proposed retail uses at the site it would not prejudice the vitality or viability of the boroughs Town Centre locations and would ensure future residents of the site have access to on-site retail provision. Whilst the site is not located in a town centre, in line with the aspirations set out in the London Plan and draft London Plan for Opportunity Areas the proposed retail uses are acceptable at this site. The total retail provision is significantly below the 2,500 sq.m. required to warrant the preparation of an impact assessment, in accordance with paragraph 89 of the NPPF.

Community/Social infrastructure

104 London Plan Policy 3.16 and Policy S1 of the draft London Plan seek to protect and enhance social infrastructure provision and resists proposals that would result in the loss of social infrastructure in areas of defined need for that type of facility without realistic proposals for re-provision. Policy S1 states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. The provision of social infrastructure is also central to the Mayor's Good Growth agenda, as specified in draft London Plan Policy GG5, which underpins the draft London Plan. Policy CH1 of the Core Strategy stipulates that all development must include measures to help secure and maintain cohesive communities acknowledging that accessible, safe and shared community facilities is a critical component of this.

105 The proposals include 338 sq.m. of community floorspace at the ground floor of Building B intended for use as a nursery/creche and 496 sq.m. of community floorspace at the ground floor of Building C for use as a community centre. It is also understood that the applicant has identified a potential operator for the proposed creche. These uses will contribute positively to the residential character of the Charlton Parks and Riverside SPD character areas, will help meet the social infrastructure needs of the future residents, in addition to animating the adjacent public realm in Plot A. The proposed creche and community facilities are therefore supported and in accordance with London Plan Policy 3.16, draft London Plan policies S1 and GG5 and Local Plan policy CH1.

Housing

106 The principle of residential development is outlined below. London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase London's supply of housing and, in order to do so, sets each borough a housing target. The 2016 London Plan sets Greenwich's at 2,685 additional homes per year between 2015 and 2025. The draft London Plan updates these figures for the 2019 – 2029 plan period, increasing Greenwich's annual target to 3,204. Policy H1 of the Core Strategy establishes a target across the plan period (2013–2028) to deliver a minimum of 38,925 net additional dwellings over the 15 year plan period. This provides for an annualised target of 2,595. The proposals will contribute positively to the borough's target.

107 London Plan Policy 3.3 and draft London Plan Policy H1 seek to optimise housing potential. Policy 3.3 directs that boroughs identify and seek to enable additional development capacity to be brought forward. Policy H1 states boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions.

At a local level, Greenwich Policy H1 prioritises development on brownfield land stating at 4.1.8 that It is expected that at least 99% of the development built in Royal Greenwich will be on brownfield sites.

108 The proposed development would provide 771 homes. This would equate to approximately 27% of the annual target for the Borough as set out in the London Plan. The residential intensification of this accessible, low density brownfield site that will provide 771 units in a mixture of one, two, three and four bed units, including affordable family sized accommodation, is strongly supported and in accordance with policies 3.3 of the London Plan and H1 and H12 of the draft London Plan and would also assist Greenwich Council in meeting its London Plan 10 year target of 2,685 units a year. GLA officers note that the Council have a strong track record of granting planning permission for new homes, however, up to date housing delivery data demonstrates that the number of homes delivered falls significantly below London Plan targets. GLA officers acknowledge that schemes such as this provide an opportunity to ensure future targets are met or exceeded.

109 The housing element of the proposals is discussed in further detail in paragraphs 111 to 159.

Land use principles conclusion

110 As set out above, given the site's context as a previously developed site in an accessible location, its location in the Charlton Riverside Opportunity Area, and the strategic priority afforded to housing in the London Plan, the principle of the housing-led, mixed-use redevelopment of this site is in line with national, strategic, and local policy. GLA officers note that this is a position which is shared by Greenwich Council officers as outlined within the boroughs planning board report. The application includes the provision of high quality flexible employment floorspace suitable for SME's to replace the existing low-density industrial uses, that is capable of accommodating increased job numbers, and reflects the Council's regeneration objectives of delivering new and consolidated employment uses in Charlton Riverside. The small scale retail and community facilities respond appropriately to the Charlton Riverside Masterplan SPD (2017) character areas for this location, will meet the need of future and existing residents and will help activate the public realm. The proposed land uses are considered, overall, to be acceptable, align with the regeneration objectives for the Charlton Riverside Opportunity Area and to be a significant gain arising from the proposal.

Housing

Affordable housing

111 London Plan Policy 3.11 states that the Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London up to 2031. Draft London Plan Policy H5 goes further by setting a clear strategic target of 50% of all new homes delivered across London to be affordable.

112 London Plan Policy 3.12 requires that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed-use schemes. Negotiations on sites should take account of their individual circumstances including development viability, resources available from registered providers (including public subsidy), the

implications of phased development including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.

113 In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance (SPG), which sets out his preferred approach to the delivery of affordable housing, introducing a Fast Track Route for applications that deliver a certain portion of affordable housing on site (subject to tenure and increasing this further through the use of grant funding). The document also sets out detailed guidance to the form, content and transparency of viability assessments and the requirements for review mechanisms. The threshold approach to affordable housing is also set out in draft London Plan policies H6 and H7. In November 2016, the Mayor also launched a new Affordable Homes Funding Programme for the period of 2016-21, which introduced new affordable products, rent benchmarks and grant rates.

114 Notwithstanding the above, the Mayor's SPG and Policy H1 of the draft London Plan recognises that the generally lower existing use values for industrial land allows for higher levels of affordable housing to be provided on such sites, and therefore where surplus industrial land is deemed suitable for release for housing in line with London Plan policies 2.17, 3.7, 4.4 and Policy E7 of the draft London Plan, such sites should fully contribute towards the delivery of the strategic affordable housing target. On this basis, to capture the uplift in land values towards increased affordable housing provision, Policies H6 and H7 of the draft London Plan set out that schemes on industrial land, such as the application site, that would result in a net loss of industrial capacity, provide 50% affordable housing on site, without public subsidy, and meet the preferred strategic tenure split, would not be required to submit viability information nor be subject to a late stage review.

115 London Plan Policy 3.11 sets a preferred tenure split of 60% social/affordable rent and 40% for intermediate rent or sale. It also states that priority should be accorded to the provision of affordable family housing. Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of the following: at least 30% low cost rent, where that is social or affordable rent at a level significantly less than 80% of market rent; at least 30% intermediate, with London Living Rent and London Shared Ownership being the default products; and the remaining 40% to be determined by the Local Planning Authority and agreed with the GLA.

116 At a local level, Greenwich Core Strategy Policy H3 requires that developments of 10 or more homes or residential sites of 0.5 hectare or more will be required to provide at least 35% affordable housing according to Affordable Housing Viability Assessment (AHVA). The precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and of the development, including financial viability. Paragraph 4.1.14 of the Core Strategy states that affordable housing should provide 70% social/affordable rented and 30% intermediate housing. The vision set out in the Charlton Riverside SPD (2017) also seeks 35% affordable housing.

117 When the Mayor considered the application at Stage 1, the application proposed 143 affordable units consisting of 103 for affordable rent and 40 shared ownership homes, this equated to 16% of the scheme on a habitable room basis. It should however be noted that the scheme considered by the Mayor at Stage 1 was substantially different in nature, comprising 975 residential units, in buildings ranging from 2 to 28 storeys in height. As set out in paragraphs 35 above, following the issuing of the Mayor’s initial representations and the adoption of the Charlton Riverside Masterplan SPD, the applicant worked with Greenwich Council officers to substantially revise the scheme design in response to the SPD design objectives. A key change was the significant reduction in residential units from 975 to 771 units and reduction in massing to reflect the SPD maximum building height of ten storeys in this location. The Mayor noted at the time that, based on the information made available to GLA officers and the quantum of residential development proposed, the affordable housing offer was unacceptable and set out that GLA officers would work with the applicant and the Council to ensure that the maximum amount of affordable housing was delivered as part of the redevelopment of the application site. It was also noted that GLA officers had made it clear throughout the pre-application process that they would expect at least 35% affordable housing to be delivered on the site.

118 Following the submission of the scheme amendments referred to above, and the robust interrogation of the applicant’s viability assessment by GLA officers, Greenwich Council and its independent advisors, the applicant made a growth based offer to deliver 25% affordable housing by habitable room with a 70:30 split between affordable rent and intermediate for the revised proposals and provided updated financial viability information to support the offer. Following the conclusion of the Council’s independent review, this was acknowledged by Greenwich Council officers in their board report as achieving the maximum reasonable amount that the scheme could deliver. Notwithstanding this, the applicant made a further increased offer of 35% affordable housing (on a habitable room basis), comprising 162 London Affordable Rented units and 88 shared ownership units prior to the determination of the application by Greenwich Council. As recorded in the Council’s addendum to the board report, this revised offer was welcomed by Greenwich Council and broadly responds to Local Plan Policy and the affordable housing target set out in the Charlton Riverside SPD.

119 At stage 2, the Mayor broadly supported the increased affordable housing offer, however, it was acknowledged that it did not meet the higher 50% threshold for industrial land set out in Policy H6 of the draft London Plan and the Mayor’s Affordable Housing & Viability SPG to meet the requirements of the Fast Track Route. Following the Mayor’s decision to take over the application in August 2018, GLA officers have worked with the applicant to increase the provision of affordable housing further. In this regard, the applicant has engaged with Registered Providers (RP) with a view to increasing the affordable housing provision using grant funding and has advised that provision can be increased to 40% on this basis. An amended accommodation schedule has been submitted demonstrated how the increased affordable housing offer could be delivered and a number of expressions of interest have been shared with GLA officers confirming that the proposed affordable units would be attractive to several RP’s with land holdings in the area. The provision of 40% affordable housing at the tenures identified in the following paragraphs would be secured in the section 106 agreement, with a fallback position of 35% should grant not be forthcoming.

120 The viability of the scheme has been robustly interrogated by the GLA officers and compared with other relevant information from similar developments. The cost and value inputs used are broadly supported and the Benchmark Land Value has been agreed in line with the Mayor’s Affordable Housing and Viability SPG and latest NPPG Viability Guidance and is considered reasonable. Based on current day costs and values the viability of the scheme is considered marginal with only 5% affordable housing. However, if growth is factored into sales values but with no corresponding increase in construction costs, the scheme can support 25% affordable housing. The proposed growth based offer of 40% affordable housing by habitable room, is therefore considered to represent the maximum amount that can be delivered by the scheme.

Affordable housing	Stage I	Amendments	RBG Board	Stage III
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Total units	975	771	771	771
Affordable units	143	193	250	292
Total hab rooms	2,825	2,104	2,096	2,093
Affordable hab rooms	446	549	733	838
% affordable (hab room)	16%	26%	35%	40
Tenure split	70:30	71:29	70:30	62:38

Table 1: evolution of the affordable housing offer

121 The proposed tenure split is 62.3% (London Affordable Rent)/ 37.7% (intermediate shared ownership) by habitable room. This falls between the Mayor’s SPG tenure split requirement and the Council’s expected target split outlined at supporting paragraph 4.1.14 of Policy H3, which states that affordable housing that is provided should be 70% social/affordable rented and 30% intermediate housing. The affordable rented units will be let at London Affordable Rent (LAR) which are significantly below 80% of local market rent and 43.6% of the LAR units will be family-sized units (3 and 4 bed), which results in a good proportion of the unit mix toward the delivery of family sized units within the affordable rented tenure. It is acknowledged that the proposed tenure split does not fully comply with all tiers of adopted and emerging policy however, the proposed tenure split achieves an appropriate balance between London Plan, draft London Plan, the Mayor’s SPG guidance and Local Plan policy requirements, whilst optimising overall affordable housing delivery and is therefore acceptable. Whilst intermediate provision has increased significantly since the call-in, the number of LAR has also increased. Furthermore, it is recognised that the proposed offer would meet and potentially exceed the 35% affordable housing target established in the Masterplan SPD.

122 This affordable housing commitment will be secured in the section 106 agreement and comprises the following:

affordable units	number of units	number of hab. room	% by unit	% by hab. room
London Affordable Rent	165	522	56.5	62.3
Shared ownership	127	316	43.5	37.7
total (% of scheme)	38%	40%	-	-

Table 2: affordable housing breakdown

Review Mechanisms

123 While the proposed 40% growth based offer is supported, it is recognised that this still falls significantly below the strategic target for half of all new homes built in London to be affordable and the 50% threshold for schemes on industrial land to benefit from the Fast Track Route. Moreover, the proposals seek the redevelopment of a brownfield site within an Opportunity Area where London Plan Policy encourages the delivery of housing, and affordable housing to be optimised. In this regard, and in recognition that financial viability on developments of this scale are sensitive to even minor changes in costs and values, and the potential for values to increase in the regeneration area in the future, it is important that any improvements in viability are captured for the benefit of maximising affordable housing delivery in accordance with London Plan Policy 3.12 and Policy H5 of the draft London Plan. Furthermore, the maximisation and delivery of affordable

housing on this site as part of the mixed-use proposals offers a considerable public benefit which aids in balancing the impact of displacing local employment floorspace and furthermore, significantly contributes to the public benefits package considered necessary to outweigh the less than substantial caused to the Charlton Riverside Conservation Area. Therefore, on the basis of the above, both early implementation and late stage review mechanisms are required to further optimise affordable housing delivery in accordance with strategic policy objectives and to maximise the potential public benefits of the proposals through short and long term review. The reviews will be secured as appropriate within the section 106 agreement and based on the Mayor's standard formulae.

Affordability

124 The Mayor's Affordable Housing & Viability SPG makes clear that in determining tenure, homes are to be genuinely affordable. For the low cost rent element, whilst a local planning authority may specify rental levels they consider to be genuinely affordable, the Mayor expects this to be significantly less than 80% of market rent. For intermediate products for purchase, these should be shared ownership and accord with the London Plan Annual Monitoring Report (AMR) affordability criteria with a clear expectation that a full range is secured below the upper limit.

125 The affordable rented housing would be let at London Affordable Rent which are set annually by the Mayor at levels significantly less than 80% market rent and are therefore considered to be genuinely affordable and accord with the Mayor's SPG and Policy H7 of the draft London Plan.

126 The income thresholds for the shared ownership units would be subject to a priority cascade meaning in the first three months they would be offered to priority band one which would be capped at a range of household incomes significantly below £90,000. One-bedroom units are capped at £55,000, two-bedroom units are capped at £71,000 and three-bedroom units are capped at £85,000. The units would then be capped at a gross household income of £90,000, in line with London Plan Policy 3.10 and draft London Plan Policy H7. A range of affordability has been secured, with maximum housing costs at 40% of net household income in line with the latest London Plan Annual Monitoring Report (September 2018). This will therefore ensure that housing is provided at a range of income thresholds below the upper limit to ensure the housing is genuinely affordable, in accordance with the Mayor's Affordable Housing & Viability SPG. The affordability of the proposed units will be secured within the section 106 agreement.

Conclusion on affordable housing and financial viability

127 In line with the London Plan and draft London Plan, GLA officers worked with the applicant to optimise affordable housing provision and the rents and income levels specified within the section 106 agreement accord with strategic and local guidance on affordability and will ensure that the affordable homes are genuinely affordable. Whilst the tenure split to be secured does not fully meet the expected tenure split set out in adopted and emerging strategic and local policy, it is weighted in favour of low cost rent, which is acceptable. As the overall offer does not accord with the 50% threshold for the Fast Track Route for applications on industrial land, in acknowledgement of review mechanisms secured in principle by Greenwich Council, and in view of the strategic priority given to affordable housing provision and considerations outlined above, both early implementation and late stage financial viability reviews will be secured as appropriate. On this basis, the affordable housing provision is considered on balance to be acceptable notwithstanding the slight variance from tenure mix typically expected by policy.

128 Details of the affordable housing will be secured in the section 106 agreement, should permission be granted. This will include details of affordable housing definitions, fit out, the income

thresholds and marketing strategy for the intermediate accommodation and rent levels for the affordable rented units, in addition to early and late viability review mechanisms.

Housing mix and tenure

129 The application, as amended, would provide 771 residential units, 479 of which would be market sale and 292 of which would be affordable products. The housing mix would be as follows:

unit type	market sale	London Affordable Rent	Shared ownership	total	percentage
Studio	144	-	-	144	18.7%
1-bed	88	47	67	202	26.2%
2-bed	198	46	58	302	39.2%
3-bed	48	70	2	120	15.6%
4-bed	1	2	0	3	0.4%
total	479	165	127	771	-

Table 3: Housing mix

130 London Plan Policy 3.8, draft London Plan Policy H12 and the Housing SPG promote housing choice in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. London Plan Policy 3.11 and draft London Plan Policy H12 state that priority should be accorded to the provision of affordable family housing. Greenwich Local Plan Policy H2 notes a mix of housing types and sizes will be required in all developments and should contain a proportion of 3, 4 and 4+ bedroom units. The policy notes that the specific mix on each site will be determined by factors including existing housing stock, level of accessibility to public transport, schemes for special needs groups or where there is a poor external environment. The Policy does not set out indicative borough level proportions for all housing tenures but identified a need across the Royal Borough for a minimum of 50% of new housing to be family sized (based on South East London Strategic Housing Markets Assessment 2009). This is reflected in the Charlton Riverside SPD (2017) which seeks 50% family sized accommodation across the masterplan area.

131 The proposed housing mix has been amended since Stage 2 to provide; four less studio units, two additional one bed units, five additional two bed units, and the reduction of one three bed unit and two four bed units. The overall revised mix appropriately acknowledges the guidance set out within strategic and local policy. However, GLA officers note that the proposed proportion of family housing is below that which is envisaged by the Charlton Riverside SPD (2017) and this is cited within the Council’s reasons for refusal.

132 The 2017 London Strategic Housing Market Assessment (SHMA) identifies that over the period of 2016/2041 a significant proportion of housing demand will be for one and two bedroom units. In addition, it identifies that future trends such as worsening affordability and changes to planning policies may produce a greater demand for smaller dwellings. The revised housing mix includes; 144 studio units (equivalent to 18.7%), 202 one bed units (equivalent to 26.2%), 302 two bed units (equivalent to 39.2%), 120 three bed units (equivalent to 15.6%) and 3 four bed units (equivalent to 0.4%).

133 While it is acknowledged that the overall quantum of family sized accommodation proposed is significantly below the SPD and borough wide Local Plan target of 50%, Greenwich Local Plan

Policy H2 recognises that the exact residential mixes on sites will vary according to the location of the development. As described above, the application site is within the Neighbourhood Centre and Charlton Park SPD character areas, which seeks a more civic character based around a transport and movement hub, and medium-rise apartment blocks linked to open spaces. It is also located within the area of Charlton Riverside which is currently more accessible by public transport and not reliant on significant transport interventions. On this basis, the proposed residential mix, while not meeting the SPD and borough-wide Local Plan family housing target, appropriately acknowledges the need for some larger family sized accommodation, whilst balancing the strategic need for affordable housing delivery, in a currently accessible location, in a form that responds positively to the character areas envisaged by the Charlton Riverside SPD guidance, and lends itself to smaller, apartment-based typologies.

134 It is acknowledged by GLA officers, and within the Council's Planning Board report, that increasing the proportion of larger units would likely further impact the viability of the scheme (which as set out in paragraphs 120 has already been optimised for affordable housing delivery) as a result of the direct impact this would have on the total quantum of units that could be delivered on site and the lower revenue generated by larger units. Notwithstanding, the scheme provides 43.6% of the London Affordable Rented units as three and four-bedroom units which is strongly supported by London Plan Policy 3.12 and draft London Plan Policy H12 and responds positively to the overarching SPD objectives of delivering both affordable and family sized accommodation. It is noted that the Council's assessment contained within its Planning Board report did not object to the housing mix presented at the time which was similarly below the 50% target (17% family housing). As such, having regard to the strategic and local policy contexts, and the particular characteristics of this site, notably its currently accessible location and its location within the Charlton Riverside masterplan area, it is considered on balance and based on the considerations above, that the housing mix is acceptable and in general accordance with London Plan and draft London Plan and Local Plan Policies.

Housing quality and residential standards

Density

135 Paragraphs 122 and 123 of the NPPF provide national guidance on achieving appropriate densities, stating that development should make efficient use of land, taking into account: need for housing; local market conditions; availability and capabilities of existing and proposed infrastructure; area's character as well as promoting regeneration; and good design. London Plan Policy 3.4 and draft London Plan Policy D6 seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in draft London Plan Policy D2 and Policy D4.

136 Greenwich Local Plan Policy H5 states in relation to housing developments the Council will give priority to securing a high-quality environment for residents making the best sustainable use of land, having regard to the location of the site, to the individual characteristics of the site and the character of the surrounding area. Greenwich Council's reasons for refusal cites density policy and compliance with the SPD. GLA officers note that this was not a position taken in the Council's board report which stated that, in officers' views, the proposed density was acceptable and in compliance with strategic and local plan policies.

137 The total site area is 2.53 hectares and the proposed units (771) and number of habitable rooms (2,093) produces an overall gross residential density of 305 units per hectare and 827 habitable rooms per hectare when calculated on the basis of the number of units divided by the site

area. On an individual plot basis, Plot A has a gross density of 263 units per hectare and Plot B records a gross density of 391 dwellings per hectare. This is above the indicative density range in the London Plan, and Plot A exceeds the threshold for design scrutiny as set out in draft London Plan Policy D6.

138 At present, the site has a public transport accessibility level (PTAL) that ranges from 2 in the north of the site, to 4 in south where closer to Charlton railway station, albeit that Transport for London consider the average PTAL to be 4 based on site based calculations. The London Plan states that urban sites with a PTAL of 2 to 4 should optimise sites with densities of 200-700 habitable rooms per hectare, 45 to 260 units per hectare. The site is considered to be urban by virtue of its location within an area characterised by a mix of different uses, including medium building footprints, including terraced houses, typically ranging from 2 to 4 storeys in height and located in close proximity to an arterial route. The draft London Plan Policy states that extra design scrutiny will be required where density exceeds 240 units per hectare in areas of PTAL 2 to 3, and 405 units per hectares in areas of PTAL 4 to 6. The Charlton Riverside SPD also provides guidance on development densities for the site ranging from 201 to 250 dwellings per hectare on Plot A and 251 to 300 dwellings per hectare on Plot B. The proposed density exceeds the London Plan’s density matrix; and the density of less accessible parts of the site meet the draft London Plan requirements for additional design scrutiny. The table below compares the proposed density against relevant policy guidance and demonstrates the divergence.

Comparison of proposed density against policy guidance (dwellings per hectare) – increase calculated on maximum range				
	<i>Proposed</i>	<i>London Plan</i>	<i>Draft London Plan scrutiny threshold</i>	<i>Charlton Riverside SPD</i>
Plot A	263	45-170 (+55%)	240 (+9.5%)	201-250 (+5%)
Plot B	391	45-260 (+50%)	405 (-3%)	251-300 (+30%)

Table 4: assessment of proposed density against London Plan and SPD guidance

139 As recognised with Chapter 6 of Charlton Riverside SPD, the preferred model of development within Charlton Riverside is low-medium rise, high density development, with the potential for taller buildings to be focussed around the better-connected location towards the lower section of Anchor and Hope Lane, nearer to Charlton Station. It is considered that the site is suitable for high density development given it is within an Opportunity Area where residential densities are expected to be optimised. Importantly, the application site is currently well connected to existing public transport services compared to those other sites in the Opportunity Area which are reliant on significant, and as yet unfunded, public transport infrastructure enhancements required to unlock their development potential. In this context, the density appropriate to the application site is unique amongst those other sites within the Opportunity Area. In addition, the proposed land uses and building form on Plot B are appropriate to this specific site as they would directly contribute towards the SPD objective of creating a new Neighbourhood Centre at the southern reaches of Anchor and Hope Lane.

140 The standard of design and residential quality is also high (and these matters are addressed in detail at paragraphs 141 to 154 below) and provides an appropriate mix of housing, with affordable housing maximised, and appropriate levels of play and amenity secured. The proposals also have an acceptable impact on existing neighbouring residential amenity. As such, the high-density nature of the proposals represent the optimisation of a currently underutilised and accessible site and as set out within the design sections of this report, does not present symptoms of over development. Given the particular circumstances of the site and the proposed development, the density is considered acceptable, notwithstanding it falls outside the guidance ranges in the London Plan, draft London Plan and the SPD. It is also noted that Greenwich Council officers, while

acknowledging the proposed density exceeds strategic and local policy guidance, supported it on the basis of the site's location within an Opportunity Area and the need to bring forward regeneration in Charlton Riverside.

Standard of accommodation

141 Policy 3.5 within the London Plan and Policy D4 of the draft London Plan seek to ensure that housing developments are of the highest quality internally, externally, and in relation to their context and to the wider environment. London Plan Table 3.3 and draft London Plan Table 3.1, which supports this policy, sets out minimum space standards for dwellings. The Mayor's Housing SPG builds on this approach and provides further detailed guidance on key residential design standards including unit to core ratios, and the need for developments to minimise north facing single aspect dwellings.

142 Greenwich Local Plan Policy H5 and DH1 seek to ensure that new development achieves a high quality of design and provides for an integrated environment. There is a strong presumption against single-aspect north facing units and a presumption in favour of dual aspect units where possible and in flats, a good-sized balcony, a terrace or enclosed communal gardens should be provided.

143 Internal and external space standards –All proposed units will meet the minimum space standards, as set out in Table 3.3 in the London Plan and Table 3.1 of the draft London Plan. All studio units are sized in accordance with minimum space standards for a one person dwelling and will have access to private amenity space in the form of a policy compliant loggia, balcony or terrace (sized in accordance with 1 bed two person units). In addition, in accordance with draft London Plan Policy D4 and the Mayor's Housing SPG, all bedrooms will meet the minimum standards, all units will contain complaint storage space and all balconies will be a minimum of 5 sq.m. for one to two person units, and with an additional 1sq.m for each extra occupant. Further, all buildings will comply with the minimum floor-to-ceiling heights. In accordance with Greenwich Local Plan Policy H5 and Policy DH1 it is considered the compliance with these standards ensures that the development is well designed and functional.

144 It is noted that Local Plan Policy H5 sets out that family housing should normally have direct access to a private garden, and as a guide, suggests that houses with up to three bedrooms should have a minimum garden size of 50 sq.m. In this regard, it is acknowledged that the private gardens for three of the three bedroom townhouses proposed in Building H, fall short of this local guidance with gardens ranging from 33 to 38 sq.m. All other townhouses exceed the 50 sq.m. requirement with garden sizes ranging from 50 to 66 sq.m. On balance, given all family sized houses, duplexes and flats benefit from direct access to private amenity space that accords with strategic policy standards, that all family sized houses have direct access to a private garden in accordance with the principles set out in Local Plan Policy H5 and that those houses with smaller rear gardens also benefit from larger front gardens, in addition to the generous provision of communal amenity space and playspace throughout the development, the overall provision of private amenity space for new residents is supported. It is also noted that Greenwich officers supported the overall provision of amenity space within its planning board report. The playspace provision is discussed further below.

145 Layout, aspect and daylight – Draft London Plan Policy D4 and the Housing SPG state that residential development should maximise the number of dual aspect units and avoid the provision of single aspect units. Greenwich's Local Plan states that there is a presumption against single-aspect units.

146 A total of 39% of the total 771 units will be dual or triple aspect, whilst the remainder of the units will be single aspect, with 19 of these units being north facing. As set out, strategic and local

policy advises against the inclusion of single aspect units where possible, particularly where north facing. The small proportion of single aspect, north facing units (2.5% of all units), will all benefit from either private balconies or winter gardens with openable windows to enable ventilation and generous glazing to optimise daylight penetration. It is acknowledged that the Council's fifth reason for refusal was on the grounds that the proposal fails to provide adequate levels of internal daylight and sunlight to the proposed residential units within the development. In response, the applicant has increased the glazing proportions throughout the scheme. The revised internal daylight and sunlight assessment (December 2018) submitted in support of the latest scheme amendments demonstrates that 94% of the units will achieve daylight levels in exceedance of the BRE guidance. Where daylight levels do fall short, it is noted that this is only by a very marginal amount, and overall achieves an appropriate balance between sunlight penetration, minimising north facing units and delivering private amenity space for the proposed flats. Those units on higher levels would also potentially benefit from river views, although it is recognised that the future masterplan context may obscure such views as new sites come forward for development. Furthermore, none of the upper floor units are family sized in accordance with the preference set out in the Mayor's Housing SPG.

147 On the basis of the above, GLA officers are satisfied that the provision of dual aspect units has been optimised, whilst making the most efficient use of land, and given the quality of internal spaces and access to both communal and private amenity the proportion of dual aspect units is considered acceptable, as is the inclusion of a small proportion of single aspect, north facing units in this instance.

148 The scheme generally achieves 8 units per core (or less), except in Building EF where 7 floors contain 10 units per core. Whilst this does not accord with the guidance set out in the Mayor's Housing SPG given the centrally located core in this building helps to mitigate the perception of a long enclosed corridor, that this portion of the building accommodates one and two bed units, and the efficient core to unit ratio provided elsewhere across the scheme, it is acceptable in this instance. All proposed dwelling sizes will comply with the minimum standards of the Technical Housing Standards and London Plan. It is therefore considered that the scheme complies with draft London Plan Policy D4 and the Housing SPG.

149 Noise – London Plan Policy 7.15, draft London Plan Policy D13 and Greenwich Local Plan Policy H5 and E(a) seek to ensure an acceptable environment in new residential development with regard to noise. Given the sites location in a predominantly industrial area, the greatest potential for noise arises from the surrounding existing industrial uses, particularly the adjacent Stone Foundries operations where an industrial fan is located on the site boundary, and from the nearby operational Safeguarded Angerstein, Murphy's and Riverside Wharves. In addition to the potential industrial noise sources, Imex House, the building directly to the north of Plot A, operates as a recording studio. However, this currently operates in close proximity to the existing residential properties at Atlas and Derrick Gardens and it is understood that no noise complaints have been received by the Council from existing residents. The operator of the studio has however raised concerns regarding the potential impact of construction noise on the recording operations, in addition to access and daylight impact. This is addressed in Neighbouring Amenity Impact section of this report below, in addition to the representations made by the existing neighbouring industrial and wharf operators regarding the potential impact of the introduction of additional sensitive residential receptors on the application site.

150 A condition is imposed requiring the applicant to submit for approval detailed design for the proposed noise insulation. The plant and machinery and ground floor uses proposed as part of the scheme are also unlikely to unduly impact on residential amenity, subject to conditions requiring detailed specification of equipment and internal sound insulation measures between ground and first floors to be approved.

151 Outlook and privacy – Greenwich Local Plan Policy DH(b) states that the Council will only permit an application 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. The Mayor’s Housing SPG notes that “in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18- 21 metres between habitable rooms. Whilst these can still be useful yardsticks for visual privacy, adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density.”

152 The proposed design has been developed to minimise the impact on the outlook, privacy and daylight currently experienced at the existing two storey houses of Atlas and Derrick Gardens, in addition to optimising internal separation distances, outlook and privacy for future residents. Since the Mayor recovered the application, the applicant has worked with GLA officers to amend the scheme to further improve the relationship between the proposed development and the properties at Atlas and Derrick Gardens, in particular by reducing the massing of those buildings in closest proximity. The impact of the proposals on neighbouring properties is discussed in detail at paragraphs 217 to 248 below.

153 With regards to the outlook and privacy between the proposed units, GLA officers are satisfied that there are no issues with regards to lack of privacy and direct overlooking between the proposed units and that separation distances between the buildings will provide acceptable levels of outlook, consistent with traditional residential street-based development. Overall, the development would achieve a satisfactory balance between optimising housing delivery on the currently under-used site in an Opportunity Area and achieving appropriate levels of privacy and outlook for an urban regeneration scheme. Furthermore, those units which front onto communal amenity spaces on both plots, benefit from areas of defensible private amenity space, helping to safeguard the occupant’s privacy. Greenwich officers in their assessment of the scheme, also noted that the consideration of window orientation, the use of inset balconies and the provision of privacy screens to terraces and balconies where appropriate would overall provide satisfactory levels of privacy to future occupants of the development and did not raise compliance issues on these grounds. GLA officers concur with this view.

154 In summary, given the site specific constraints and the need to respond sensitively to the amenity and development potential of neighbouring sites, the standard of residential quality is acceptable overall and is in broad compliance with London Plan policy and guidance, and Local Plan policies.

Children’s playspace

155 London Plan Policy 3.5 and draft London Plan Policies D4 and D7 set out expectations in relation to quality and design of housing development, to include public, communal and open spaces. Policy 3.6 of the London Plan and draft London Plan Policy S4 require developments that include housing to make provisions for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Guidance on the application of this policy is set out in the ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation SPG’, which sets a benchmark of 10 square metres of useable child play space to be provided per child, with under-five’s play space provided on-site as a minimum (within 100 metres walking distance from a residential unit). Provision for 5-11 year olds should be made within 400 metres of residential units and provision for over-12s should be provided within 800 metres.

156 Policy H(e) of the Greenwich Core Strategy requires that in residential developments that include over 50 units of family housing, suitably equipped and well-designed children’s play areas

are required for different age groups. The Charlton Riverside SPD acknowledges that the expansion of the residential population will require additional provision of open space, sports facilities and children’s play and envisages that play space will be delivered as part of multifunctional spaces and delivered within close proximity to residential development. It goes further to set out that the amount and spatial distribution of open space will be addressed during pre-planning application discussions.

157 As a result of the increased affordable housing offer since the Mayor ‘called-in’ the application for his own determination, the minimum playspace requirement has increased. Using the child yield methodology in the Mayor’s SPG, the scheme generates a minimum playspace requirement of 2,478 sq.m. for children aged between 0 and 12+ years old. This is broken down to 2,310 sq.m. on Plot A and 168 sq.m. on Plot B. The development would deliver 2,554 sq.m. of playspace on Plot A and 232 sq.m. on Plot B, a total of 2,786 sq.m. of playspace across the development which exceeds the total required by the Mayor’s SPG. The following provides a comparison of the playspace for each age group against the SPG standards.

Age group	Plot A		Plot B (sq.m.)		Total proposed
	Required	Proposed	Required	Proposed	
0-5 years old	993 sq.m.	1,185 sq.m.	107 sq.m.	147 sq.m.	1,332 (+232)
6-11 years old	808 sq.m.	858 sq.m.	30 sq.m.	49 sq.m.	907 (+69)
12+ years old	509 sq.m.	511 sq.m.	31 sq.m.	36 sq.m.	547 (+7)
Total	2,310 sq.m.	2,554 sq.m.	168 sq.m.	232 sq.m.	2,786 (+308)

Table 5: Children’s playspace provision

158 The playspace is proposed in a variety of different formats, providing a range of different facilities suitable for different age groups, and is dispersed across the development providing convenient access for future and existing residents. The play areas would be located within the ‘play street’ between Buildings D, E, F and Buildings G, H, the ‘eco walk’ leading to Plot A from Anchor and Hope Lane, the areas adjacent to the community centre and creche, in addition to the communal roof gardens on Plot A. The play areas on Plot B would be located within the podium garden and ground floor adjacent to Building O. The landscape design proposes that these spaces would be designed around a number of themes including nautical play, exploration play, natural play, and active play including sculptural features and more formal play equipment suitable for a range of age groups. The ‘play street’, ‘eco walk’ and street level areas proposed would be accessible to the public and in light of the sites location within an area of open space deficiency identified by Greenwich Council, this provision is strongly welcomed. The quantum and design of the playspace would be secured by planning condition.

159 As such the proposal is considered to make a generous provision for play space and is in accordance with strategic and local policy. Further consideration of the landscaping proposals is contained in the urban design section below.

Urban design

160 The NPPF (at paragraph 124) states that good design is a key aspect of sustainable development and is indivisible from good planning. Paragraph 131 states that, in determining applications, outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings. In achieving the Mayor’s vision and objectives relating to neighbourhoods and architecture, chapter 7 of the London Plan and chapter 3 of the draft London Plan sets out a series of policies about the places and spaces in which Londoners live, work and visit. London Plan Policy 7.1 (Lifetime neighbourhoods) sets some overarching design principles for development in London as does Policy D2 of the draft London Plan (delivering good design). Other

relevant design policies in this chapter include specific design requirements relating to: inclusive design (London Plan Policy 7.2/ draft London Plan Policies D3 and D5); designing out crime (London Plan Policy 7.3/ draft London Plan Policy D10); local character (London Plan Policy 7.4/ draft London Plan Policy D1); public realm (London Plan Policy 7.5/ draft London Plan Policy D7); architecture (London Plan Policy 7.6 and draft London Plan Policy D2); tall and large scale buildings (London Plan Policy 7.7 and draft London Plan Policy D8) and heritage assets (London Plan Policy and draft London Policy). These are discussed more specifically below.

161 Greenwich's Local Plan Policies H1 and H5 detail the expectations for housing design and seek to achieve a high quality of housing design and an integrated environment. Policy H5 expects all developments to achieve high quality design, be consistent with the Mayor's Housing SPG, be appropriate in terms of noise insulation and layouts of buildings and spaces and specifically it states that developments should: offer safety and security for residents and the public in accordance with Policies CH1, DH2, DH3, DH(b) and DH(g).

162 The scheme has been considered in detail at pre-application stage, during the initial Stage 1 consideration by the Mayor, and the Council in reporting the application to its Planning Board. The scheme was also subject to pre-application discussions with Greenwich Council officers and presented to the Council's Design Review Panel in June 2016 and following the submission of the application in January 2017. Subsequent scheme revisions submitted in December 2017 were reviewed by the Design Review Panel again in January 2018. The panel provided comments in February 2018 with regards to the proposals relationship to the SPD, connectivity, public spaces, residential frontages, placemaking, materials and urban design.

163 The panel considered that the scheme had been significantly influenced by the SPD and particularly welcomed the choice of materials and architecture, the prioritisation of pedestrians and placemaking in the layout, reduction in height across the site, reduction in density and consideration of how the scheme integrates into the wider area since February 2017. Notwithstanding, the comments considered that the SPD aspirations could be more fully realised in the design with regards to green links across Charlton Riverside, with specific reference to reappraising how the 'eco walk' connects to other parts of the site, how the east-west connection can set a positive design precedent through ensuring safe carriageway and pavement widths and consideration of minimising its impact to existing residents, and how the detailed design of the river connection must ensure that it provides a safe environment for pedestrians. In addition, further advice was provided with regards to the residential layouts, the situation and delineation of public and private amenity spaces, providing legible building frontages, reflecting the history and riverside location in the landscaping and urban design, the articulation and location of the gateway building. Overall, it considered that the scheme had progressed well through the design review process and suggests that it would set a good example of urban design in the area. The comments raised by the Design Review Panel are considered addressed in general throughout this report.

Layout

164 The scheme's layout principles are supported and are broadly aligned with the key masterplan principles of the Charlton Riverside SPD. The scheme has evolved positively through input from Council and GLA officers and the resulting arrangement of blocks responds appropriately to the existing context while enabling and safeguarding future development potential on neighbouring sites within the wider SPD area.

165 The orientation and positioning of linear blocks on Plot A and the podium block on Plot B makes efficient use of the site while defining a legible street network, ranging from the primary east-west route and Anchor and Hope Lane to the more intimate residential streets with integrated play and amenity space within Plot A. Basement levels within both plots allow servicing access and

refuse and cycle stores to be contained at this level, creating predominantly active residential and commercial frontages to all public facing edges.

166 The design of building forms and their positioning within Plot A has evolved throughout the planning process and the current proposal demonstrates an efficient sequence of linear blocks with back-to-back duplex units benefiting from individual front doors, creating a strong residential character and passive surveillance onto the streets and zones of play space. This approach is strongly supported and the intimate relationship between residential buildings and amenity space broadly aligns with the Charlton Parks character described in the SPD. Building G and H are positioned to form a back-to-back terraced arrangement with the neighbouring residential properties, creating a clearly defined residential street frontage with private gardens to the rear. This approach is consistent with traditional terraced typologies throughout London and is recognised as being an appropriate design response to the sensitive existing residential context to the western boundary and associated conservation area.

167 The continuation of Anchor & Hope Path through the landscaped gardens of Plot A, linking Anchor & Hope Lane to Rope Path beyond, also referred to as the 'eco walk' will help increase pedestrian permeability through this site and the wider masterplan area. This route also broadly aligns with the secondary/tertiary movement networks proposed by the SPD. This in addition to the new north-south connections through Plot A via the 'play street' and communal amenity spaces, providing links to Rope Walk and the River Thames are also strongly supported and optimise connectivity and accessibility across the site and beyond.

168 The layout of Plot B introduces a simple podium arrangement with three distinct residential blocks above with the majority of refuse and cycle storage contained at basement level. This provides an appropriate ground level interface with neighbouring industrial units while allowing potential for neighbouring future development to form new streets and routes along the eastern and southern edges, should those sites come forward for regeneration. Building O appropriately defines the prominent corner onto Anchor and Hope Lane, through its taller, standalone form, and creates a zone of public realm flanked by active commercial uses at its base and within the adjacent podium block. At podium level, the three residential blocks define a zone of shared amenity and playspace, accessible from all five cores and the site's orientation allows potential for good levels of south light penetration to this space which is welcomed.

169 The overall plot layout enables the delivery of the key transport infrastructure as identified by the SPD in the form of the first section of the new east-west transit route running from Anchor and Hope Lane between the two plots. Plans have been provided which demonstrate that a suitable width can be accommodated between the two sites to deliver a route that meets the required specification for two lanes of traffic, a bus lane in each direction, cycle lanes, pavements and landscaping. The scheme has been amended in response to consultation with Transport for London by cutting back the footprint of the buildings on Plot B in order to allow sufficient width for this new highway based connection to be delivered in future, in addition to the submission of indicative layouts demonstrating how this new connection might be delivered. This key infrastructure is discussed in further detail in the transport section below.

Landscaping

170 The scheme provides a generous public realm offer comprising a range of well-considered public, private and semi-private landscape amenity areas distributed throughout the two development plots, complimented by extensive soft landscaping in line with the objectives of London Plan Policy 5.10 and draft London Plan Policy G5. The overall offer represents a substantial improvement above the existing situation which comprises a predominantly hard paved industrial site, dominated by heavy vehicle storage, with the exception of a relatively small selection of mature trees on the periphery, which will be protected, retained and incorporated into the wider

landscape proposals. Subject to details of planting, hard surface treatments and greening (to be secured by condition), this would ensure a high-quality setting for the buildings proposed. The planting and landscaping proposals onsite will help mitigate microclimate impacts, address urban greening objectives and contribute towards significantly improving the ecological value of the site which is identified as being in an area of wildlife and open space deficiency. The impact of the development on trees and urban greening is addressed in more detail in paragraphs 281 to 283 below.

Summary of layout

171 The proposed building layout and landscaping proposals optimise the development capacity of the site whilst responding well to its constraints and the broad design objectives set out in the SPD guidance with regards to residential typologies, pedestrian connectivity, the provision of well activated, high quality public realm, and urban greening. The proposed site layout is therefore supported in line with the policy context set out above.

Height and massing

Tall buildings policy

172 The following section will establish and outline the layers of policy which apply to the tall buildings assessment which will follow below.

173 London Plan Policy 7.7 (Location and design of tall and large buildings) and draft London Plan Policy D8 set out the strategic policy with regard to tall buildings and establish that the Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character and help to provide a catalyst for regeneration where they are acceptable in terms of design and impact on their surroundings. Suitable locations for tall buildings may include the Central Activities Zone and Opportunity Areas, and areas of good access to public transport. The policies recognise that the impact of tall buildings in sensitive locations such as conservation areas and the setting of listed buildings needs particular consideration.

174 Greenwich Local Plan at Policy DH2 and supporting paragraph 4.4.21 sets out that tall buildings may be appropriate in Charlton Riverside so long as the appropriate public transport infrastructure is delivered to support them and sufficient consideration is given to an historic assets and distinctive character features. Paragraph 4.4.16 identifies tall buildings as any building, including all types of structures such as masts, pylons, chimneys etc, which is noticeably taller than its surroundings, has a significant impact on the skyline or is larger than the threshold size set for the referral of planning application to the Mayor. Importantly, what is considered tall in one area would not necessarily be considered tall in another.

175 The SPD provides guidance on the distribution of buildings heights across the Opportunity Area, and applies a specific emphasis on a low to medium rise, high density development model. The SPD acknowledges that while there are other areas of London, including parts of the Royal Borough of Greenwich, where tall buildings have been used to deliver density of development, there are several reasons it considered that it is not appropriate to do so at Charlton Riverside. The reasons set out are the consideration of the surrounding context, particularly to existing residential; existing site topography and views into and across the site from north to south also merit consideration; and the low to moderate level of public transport accessibility.

176 On this basis, the SPD sets out that buildings should typically range from three to six storeys in height, with the opportunity for some taller buildings of up to ten storeys along the riverside and areas around the Neighbourhood Centre towards the southern end of Anchor and Hope Lane, closer

to Charlton Station, where public transport accessibility is higher. The SPD also notes that the detailed consideration at design proposal and planning stages should ascertain what is an appropriate scale for a specific location.

177 With regards to the application site, the SPD suggests building heights of up to 5 storeys in height on Plot A to respond to the existing residential context and buildings up to 10 storeys on Plot B to reflect the Neighbourhood Centre allocation in the SPD.

178 The proposed buildings on Plot A range from 2 to 10 storeys in height, with the lowest elements in closest proximity to the two storeys terraced houses at Atlas and Derrick Gardens, stepping up in height to 10 storeys towards the east, where the context is less sensitive. Starting from the western site boundary, Building G is a part 2, part 3, part 4 storey residential building with the top storey set back from the boundary and Building H comprises a terrace style building of predominantly 3 storeys with a fourth floor set back from the boundary. The centre of Plot A is occupied by Building D, which is 10 storeys in height, with Building EF separated to the south by the continuation of the 'eco walk', comprising 8, 9 and 10 storeys, which step up from the centre of the site towards the new east-west transit connection. Buildings A, B and C on the eastern boundary, separated by pedestrian connections are 10 storeys in height. Plot B comprises a podium block, with the exception of the standalone 10 storey Building O. The podium accommodates flexible workspace with residential buildings above ranging from 5 to 10 storeys, with the five storey element responding to the closer relationship of this building and the properties at Atlas Gardens and Anchor and Hope Lane.

179 GLA officers acknowledge that the proposals partially conflict with the SPD height guidance with regards to Plot A but broadly comply with the guidance for Plot B. However, as recognised within the Council's Planning Board report, the building heights set out in the SPD should be treated as indicative guidance to inform the design process, and a detailed assessment of the proposals should be carried out within regards to local context and design approach for each site.

Tall buildings assessment

180 Greenwich Council, in contrast to the officer recommendation in the planning board report sought to refuse the scheme citing the impact of height, massing and design resulting in overdevelopment of the site that would fail to adhere to the vision for the redevelopment of the area set out in the Charlton Riverside SPD 2017 as a reason for refusal. It was also cited that the height of the proposals and their proximity to existing residential properties would result in an unacceptable reduction in daylight, privacy and overshadowing of external amenity spaces to these properties. These matters were also raised as part of the recent re-consultation. GLA officers have had regard to this reason for refusal and consultation response when assessing the height and massing of the proposal against the relevant policies.

181 Following the Mayor's decision to call in the application, GLA officers have negotiated a number of design amendments to the scheme's heights and massing arrangement, to assist in addressing the Council's reasons for refusal on height and massing grounds and to ensure that the scheme's massing is scaled to minimise amenity impacts on Atlas and Derrick Gardens, while maintaining an appropriate variety of building heights to reflect the SPD's aspiration for locating taller buildings around the better-connected parts of the site.

182 The amendments comprised the redistributing of the massing by reducing the height of Building G to match that of Building H to provide a predominantly 3 storey building with the fourth storey set back, and the reduction of height of Building J to 5 storeys (removal of two floors) to create a more sympathetic massing relationship with Atlas Gardens. In order to maintain the overall quantum of units and assist scheme viability, an extra floor has been added to Buildings D and EF to offset the height reductions. The massing is described in detail in paragraph 178 above. This

approach is supported and helps minimise amenity impacts to Atlas and Derrick Gardens (see paragraphs 217 to 248 for detailed assessment of neighbouring impacts) and locates the tallest elements furthest away from the conservation area to less sensitive parts of the site. The additional height to Buildings D, E and F will not have a material change to the extent of daylight penetration to residential gardens of inward facing units proposed.

183 Overall, the proposed heights and massing strategy is considered to be broadly consistent with the aspirations of the SPD in terms respecting the character and amenity of existing residential properties, and of locating taller elements towards the key east/west route and Charlton Station. In this context, the site is unique in the Opportunity Area compared to other schemes currently being considered, as it is currently accessible and not reliant on significant infrastructure to unlock its potential. It also provides the first section of the key east-west transit route through the masterplan. The consistent scale of mansion blocks within Plot A creates an appropriate degree of enclosure to the streets and amenity spaces, without appearing overbearing. This is further supported by the cranked floorplates and setbacks to linear blocks, creating a series of distinctive residential buildings. The varied articulation of buildings and high quality materials palette helps to accentuate the form of blocks, creating a strong residential character and promoting a sense of ownership for future residents.

184 In terms of the visual impact of the height and massing on the identified townscape and visual receptors, it is recognised that the proposals would have a noticeable impact on the local townscape and would be clearly visible within the setting of the Conservation Area and locally designated heritage assets given the existing low rise industrial character of the area (see heritage section below for full assessment). However, the SPD sets a clear vision for the comprehensive regeneration of Charlton Riverside which would fundamentally change the existing townscape character and therefore the significance of the degree of change does not necessarily indicate that the proposals are harmful. In this case, the proposals would involve the redevelopment of the low density industrial buildings for a scheme of high quality architecture in a sympathetic palette of materials, which will improve the quality of the townscape when compared to the existing industrial estate, enhance local public realm provision, provide a significant quantum of affordable housing in an accessible location and will complement the wider regeneration of the Charlton Riverside Opportunity Area through the delivery of the gateway to the new principal east-west transit route.

185 The proposed buildings on Plot B are in general accordance with the SPD guidance respecting the maximum building height of ten storeys in this location, and the form, massing and uses would successfully contribute to the civic character of the Neighbourhood Centre proposed in this area. While the proposals on this plot will represent a significant increase in height from the residential properties at Anchor and Hope Lane and Atlas Gardens, as set out in the amenity impact assessment below, the reduced height of Building J has directly improved this relationship, lessening the daylight and sunlight impact to acceptable levels that generally accord with policy guidance. The standalone ten storey building proposed will also act as an appropriate landmark building, marking the entrance to the new transit route and access to the wider regenerated Charlton Riverside area.

186 While it is acknowledged that the scale of Buildings A, B, C, D and EF on Plot A exceed the SPD guidance of 4 to 5 storeys (Buildings G and H accord with the height principles), they are located furthest away from sensitive receptors and as set out within the detailed assessments in this report do not create unacceptable conditions for existing neighbouring buildings and uses, or for future residents, and make the most efficient use of the brownfield site. In light of this, the scale should therefore be considered in the local context and against tall buildings policy.

187 The proposals are considered to conform to the relevant assessment criteria set out within Local Policy DH2 and the site's location within an Opportunity Area (Charlton Riverside) recognises that this is an area that will likely undergo significant change in townscape. Policy DH2 of the Local

Plan states that Tall Buildings will be assessed against Local Plan policy objectives and that of London Plan Policy 7.7 which requires that tall buildings are;

- located in appropriate areas with good access to public transport including opportunity areas,
- located in areas whose character would not adversely be affected,
- relate well to the surrounding buildings, urban grain and public realm, improve the legibility of an area,
- incorporate the highest standards of architecture and materials,
- have ground floor activities that provide a positive relationship to the surrounding streets contribute to improving the permeability of the site and wider area, where possible,
- incorporate publicly accessible areas on the upper floors where appropriate,
- make a significant contribution to local regeneration.

188 The form of the buildings respond positively to the existing buildings of townscape merit and do not appear out of scale when viewed in the context of existing large industrial buildings from longer range views around the Opportunity Area. In this regard it is not considered that the proposals would adversely affect the existing character of the area and is of a scale appropriate to, and would make a significant contribution to, the regeneration objectives for Charlton Riverside. As set out below, the proposal would result in less than substantial harm to the Charlton Riverside Conservation Area and locally designated heritage assets. However, the proposal would deliver a number of public benefits including affordable housing, community facilities, flexible workspace suitable for SME's and high quality publicly accessible amenity spaces that sufficiently outweigh this harm. Based on the above, and the proposed building layout and landscaping proposals which significantly enhance local permeability and wider area which will be well activated by residential, community and commercial uses, and delivered at a massing that will preserve the amenity of existing residents, it is considered that the requirements of strategic and local tall buildings policy are met, do not present symptoms of overdevelopment and are therefore appropriate on this site given its particular characteristics. The impact on heritage is considered separately in heritage section below.

189 Notwithstanding the above, the application site occupies a sustainable location to support higher density development when compared to the wider regeneration context of the Charlton Riverside Opportunity Area, where large areas will be reliant on uncommitted strategic transport infrastructure improvements to unlock their development potential and support high density residential development. It is therefore considered, that the geographical characteristics of the application site, in that it is currently accessible from the existing highway and pedestrian network and served by convenient access to existing bus and national rail services, appropriately justify the proposed divergence from the SPD height and density guidance in this case, and that this would not necessarily be supported on other sites for the above reasons. Furthermore, the proposed development will kick start the delivery of the new east-west transit route which provides a significant contribution to aiding the sustainable regeneration of the Charlton Riverside and optimising wider housing and employment delivery.

Detailed design and architecture

190 The scheme demonstrates a strong contextual design response to the site with varying building typologies creating distinct character areas across the two plots.

191 The three linear blocks in Plot A are designed to frame the residential street and amenity spaces between them, with ground level duplex units forming active edges, as well as creating clearly defined bases to each building. At the upper levels, the simple mix of brick grids and deep set window reveals creates a refined residential appearance and an appropriate design quality

benchmark for the future development of the wider masterplan area. Subtle variation in articulation of windows and balconies along the long facades of each block, following the blocks' kinks and setbacks, avoids the impression of a repetitive or monotonous appearance. It also creates a sequence of well-proportioned and distinctive frontages, promoting a sense of ownership and belonging for residents.

192 In contrast, the podium arrangement of Plot B introduces a consistent and active 1.5 storey/double-height presence onto the public realm and its rhythm of piers is carried through into the architecture of the lower portion of the standalone Building O, creating visual consistency between the two. This more formal approach to the architecture in comparison to Plot A, forms an appropriate transition between the neighbouring industrial land and more public facing edges along Anchor and Hope Lane, and reflects the SPD aspirations to create a more civic character in the Neighbourhood Centre. At the upper levels, the varied materials palette of glass reinforced concrete (GRC) and high quality brickwork is successful in distinguishing between commercial and residential elements while creating visual interest and contrast from a street and podium level perspective. The proportions and refined attention to the detailing and depth of Block O's facades is well judged, resulting in a distinctive but appropriately muted building that marks this prominent corner of the site and the gateway to the future east-west connection.

193 As noted by Greenwich officers in the planning board report, it is considered that the extensive use of brick responds appropriately to the existing residential context and the use of different facade treatments provides variety and a distinctive style to each building whilst providing a unified composition across the development as a whole. GLA officers concur with this assessment, and the approach to architecture and design is therefore supported. Planning conditions will ensure that a high quality of detailing and materials will be used in the completed development and retention of the scheme architects in the construction process.

Heritage

194 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to conservation areas section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, planning decisions must also give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by the proposed development.

195 The NPPF identifies that the extent and importance of the significance of the heritage asset is integral to assessing the potential impact, and therefore acceptability. The definition of significance in this context is the value of the heritage asset in relation to its heritage interest and this may be archaeological, architectural, cultural or historic. The significance of a heritage asset may also derive from a heritage asset's physical presence as part of the townscape or its setting. Where a proposed development will lead to 'substantial harm' 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 loss is necessary to achieve substantial public benefits that outweigh the 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. Paragraph 197 of the NPPF says that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

196 London Plan Policy 7.8 states at criterion D that "development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials

and architectural detail". The supportive text explains that development that affects the setting of heritage assets should be of the highest quality of architecture and design and respond positively to local context and character. These sentiments are also stated in Policy HC1 of the draft London Plan.

197 At a local level, Greenwich Local Plan Policy DH3 seeks to protect the historic environment, conservation areas and listed buildings. Stating the Royal Borough will protect and enhance the heritage assets and settings of Royal Greenwich, applying a presumption in favour of the preservation of statutory listed buildings and their settings, giving substantial weight to protecting and conserving locally listed buildings.

198 With the exception of the new proposed pedestrian route from Anchor and Hope Lane into the site, referred to as the 'eco walk', where no buildings are proposed, only landscaping measures, the site is not within a Conservation Area and does not contain any statutorily or locally listed buildings. It does however adjoin the eastern and southern boundaries of the Charlton Riverside Conservation Area which was adopted in March 2018 and is a designated heritage asset. The Conservation Area incorporates the two storey residential properties at Atlas and Derrick Gardens and Anchor and Hope Lane, which have recently been added to the Council's local heritage list, as have the industrial Stone Foundries buildings to the east of Plot A. Given the scale of development proposed it is acknowledged that the development would have an impact on the setting of the Conservation Area and locally listed assets within it and therefore requires assessment.

199 The character of the Conservation Area is largely derived from the historic riverside industry of the area with the area closest to the site, characterised by the existing residential properties and associated open spaces. These residential buildings are distinctive within an area that is otherwise dominated by large industrial buildings and uses. The buildings date from c. 1908 and were erected by Cory and Sons, who operated the nearby boat and barge works, in order to house their workers. The buildings addressing Atlas and Derrick Gardens front onto two rectangular open garden spaces which are set back from Hope Lane and are symmetrically arranged around the north, east and south sides of the gardens. In terms of setting, the most significant views within this part of the Conservation Area are those looking from Anchor & Hope Lane across the open spaces towards Atlas and Derrick Gardens, where the composition of the buildings is clearly seen and their backdrop setting is currently unimpacted by background development, thereby ensuring that the rooflines and chimney stacks retain prominence against a clear sky.

200 Whilst the proposed development has been reduced in scale, it is acknowledged that the proposals will remain visible in key views within the Conservation Area looking from Anchor & Hope Lane towards the site. As illustrated within the updated Townscape and Visual Impact Assessment the upper floors of the proposed development will be visible over the existing rooftops of Atlas and Derrick Gardens when looking eastwards from within the associated open spaces. In these views, the proposals will introduce significant new built elements into the backdrop setting of the Conservation Area and locally listed buildings and will impact the clear skyline currently experienced for much of the backdrop setting. However, while this will cause some harm to the significance of the Conservation Area, this is considered to be less than substantial in nature and generally preserves the ability to appreciate the symmetrical composition of the buildings and their architecture. In this respect, the proposals are also considered to cause less than substantial harm to the setting of the locally listed heritage assets at Atlas and Derrick Gardens.

201 Notwithstanding the above, the existing industrial buildings on the application site, together with extensive areas of parking and vehicle storage are considered to have a negative impact upon the character and appearance of the Conservation Area and its setting. The proposed development would remove these unsightly elements, such as the vehicle storage in the area between Atlas and Derrick Gardens and replace it with landscaped open space, therefore enhancing the character and appearance of the Conservation Area and the setting of the locally listed assets. It is also noted that

the remnants of the former narrow-gauge railway that exists on the site of the former rope works, will be incorporated into the new pedestrian walkway from the site to the River, recognising, recording and providing the opportunity for members of the public to appreciate the industrial heritage of the site's former uses.

202 In light of the above, GLA officers consider the less than substantial harm to the setting of the Conservation Area and locally designated heritage assets is however, clearly outweighed by the public benefits of the scheme, principally the delivery 771 new homes, including 292 genuinely affordable housing units with the potential for this to be further enhanced through early and late stage viability reviews, enhancements to the appearance of the site, along with wider regeneration benefits for the Opportunity Area, a policy compliant mix of uses including community facilities, and significant public realm enhancements. In coming to this conclusion, GLA officers have taken account of the statutory duty contained in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Furthermore, Historic England made no comment on the revisions with regards to designated heritage assets. The proposals comply with the NPPF, London Plan Policies 7.8, Policy HC1 of the draft London Plan and Local Plan Policy DH3.

Archaeology

203 London Plan Policy 7.8 and draft London Plan Policy HC1 seek to ensure that development proposals identify assets of archaeological significance and use this information to avoid harm or where harm is unavoidable, minimise it through design and appropriate mitigation. Greenwich Local Plan Policy DH(m) expects applicants to cooperate in the excavation, recording and publication of archaeological finds before development takes place by use of planning conditions/legal agreements as appropriate. The application site is also identified as being within the Greenwich Peninsula and Foreshore Archaeological Priority Area.

204 It is noted within the Charlton Riverside Employment and Heritage Study (2017) that there is evidence of remnants of the former narrow gauge railway from the former Charlton Ropeworks to the River Thames and remnants of the ropewalk rails themselves embedded across the site. As set out above, the remnants of the railway will be incorporated into the new pedestrian access route from the site towards the River. The Greater London Archaeological Advisory Service (GLAAS) was consulted on the application and on consideration of the supporting heritage statement recommended a planning condition to secure a two stage process of archaeological investigation. A further condition securing a programme of public outreach through the investigation to engage in the sites 20th Century industrial heritage was also recommended. The programme of investigating and recording to preserving the industrial heritage of the site also aligns with the recommendations made within the Charlton Riverside Employment and Heritage Study (2017) and have therefore been secured within the draft decision notice.

Fire safety

205 In the interests of fire safety and to ensure the safety of all building users, Policy D11 of the draft London Plan seeks to ensure that development proposals achieve the highest standards of fire safety.

206 The Design and Access Statement has been prepared in consultation with a suitably qualified fire engineering consultation. The accompanying detail confirms that each building core has a fire fighting lift and escape stair, leading to a convenient and accessible fire exit route from the building to ensure the safe evacuation of the buildings if needed. It is noted that the London Fire & Emergency Planning Authority have advised that access to pump appliances and water supplies for the fire service are adequate and it is generally satisfied with the proposals. Overall, GLA officers are satisfied that the proposals are in accordance with draft London Plan Policy D11.

Designing out crime

207 Policy 7.3 of the London Plan and draft London Plan D10 seeks to ensure that measures to design out crime are integral to development proposals and considered early in the design process. A number of criteria are set out in this policy regarding reducing opportunities for criminal behaviour and contributing to a sense of security without being overbearing or intimidating. Greenwich Local Plan Policies DH1, H5 and CH1 all seek to secure developments which contribute to a safe and secure environment for users and the public and which aim to discourage crime.

208 The scheme has carefully considered the interaction of the buildings with the public realm; streets have continuous frontages to pavements and roads, with ground floor residential properties predominantly accessed directly from the public realm, and habitable rooms above overlooking shared communal spaces. The recent amendments relocate the vehicular basement access off of the new key east-west route and replace it with individual residential entrances to two, three bed duplex units on the corner of Building EF, helping to further reinforce street-based, pedestrian activity on this key frontage, promoting passive surveillance throughout the development.

209 A condition is recommended to be imposed to ensure that the scheme achieves Secured by Design accreditation. On review of the proposals, the Metropolitan Police Secured by Design officer was of the view that the proposals should be able to meet the standard. As such, the proposals are acceptable with respect to designing out crime and comply with London Plan Policy 7.3 and Greenwich Local Plan Policies DH1, H5 and CH1.

Conclusion on urban design

210 GLA officers consider that the design of the scheme is well-considered, responds positively to the development principles outlined in strategic and local policy contexts and will achieve a high quality of place making reflective of local regeneration objectives. The massing and layout strategy responds to the site characteristics and the existing and future regeneration context. GLA officers acknowledge that while the proposals do not fully accord with the height and density guidance in the Charlton Riverside SPD (2017) for Plot A, the buildings are in a sustainable location, well designed and justified in the context of the relevant criteria set out in the London Plan and would cause less than substantial harm to heritage assets that is clearly outweighed by public benefit. The quality of the design, architecture and materials will ensure a high-quality development which will contribute positively to the wider regeneration of this part of the Charlton Riverside Opportunity Area. The development will thus comply with the relevant development plan policies set out above.

Inclusive design

211 London Plan Policy 7.2 and draft London Plan Policy D3 requires that all future development meets the highest standards of accessibility and inclusion, and that the design process has considered how everyone, including those with disabilities, older people, children and young people, will be able to use the places and spaces that are proposed. London Plan Policy 7.6 requires that buildings and structures meet the principles of inclusive design, and London Plan Policy 3.8 and draft London Plan Policy D5 require that ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings' – which means to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The Mayor's SPG "Accessible London: Achieving an Inclusive Environment" provides guidance on the implementation of these policies.

212 Greenwich's Local Plan Policy H5 requires that 10% of the dwellings be built to full wheelchair accessible standards or be easily adaptable for wheelchair users. Details of accessible and

inclusive design have been provided within the Design & Access Statement which focuses on the inclusive design measures within the public realm and buildings. The application drawings and landscape drawings also show how key inclusive design features would be incorporated.

Accessible homes

213 All residential units in would meet Building Regulation requirement M4(2). A total of 78 units would meet Building Regulation M4(3), representing 10% of the units. These are split with 18 units within the private element of the development and 60 units within the affordable element. Detailed layouts for the M4(3) units are included as part of the submitted drawings and will ensure that the scheme delivers accessible homes of an acceptable standard in accordance with London Plan and Local Plan policy. A condition is recommended to ensure that the units meet the relevant Building Regulations requirement.

Public realm

214 The submitted drawings and landscape strategy demonstrate that appropriate levels and gradients can be achieved across the site to ensure an inclusive environment throughout. Vehicle access for servicing is predominantly maintained to the periphery of Plots A and B, with the exception of the central portion of the 'play street' which will be required for occasional refuse collection access and vehicular access and egress to the adjacent Imex House. However, the low vehicle movements and low speeds associated with the servicing access would not give rise to an unacceptable conflict between pedestrians and vehicles, subject to detailed hard landscape design. The accessibility statement within submission sets out how the wider public realm has been designed to be inclusive to all users.

Car parking

215 The overall development would include 208 car parking spaces, of which 56 would be reserved as Blue Badge accessible parking spaces. Whilst the accessible car parking provision falls short of London Plan policy requirements, this level of provision would meet the minimum requirement of Policy T6.1 of the draft London Plan for at least one designated disabled persons parking bay per dwelling for three per cent of dwellings. The overall quantum of car parking would allow this provision to be increased if required and therefore a car parking management plan, secured through the section 106 agreement, demonstrating the measures to monitor and increase this provision up to one bay per ten per cent of dwellings, if necessary, will ensure full compliance with London Plan and draft London Plan policy. This will be secured within the section 106 agreement and on this basis the proposed disabled parking provision is acceptable.

Inclusive Design Conclusion

216 For the reasons set out above, the proposal would achieve a high level of accessible and inclusive design and would comply with London Plan Policies 3.8, 6.13, 7.1, 7.2, 7.5 7.6, draft London Plan Policies GG1, D3, D5, T6.1, T6.5, the Accessible London SPG, Greenwich H5 and Local Plan Policy.

Neighbouring amenity impacts

217 A core principle of the NPPF is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. London Plan Policy 7.6 and draft London Plan Policy D2 state that the design of new buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings in relation to privacy, overshadowing, wind and microclimate. London Plan Policy 7.7 and

draft London Plan Policy D8 state that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference. London Plan Policy 7.15 and draft London Plan Policy D13 seek to reduce and manage noise associated with development.

218 At a local level, Greenwich Local Plan Policy DH(b) DH(b) states that developments will only be permitted where it can be demonstrated that the proposal does not cause an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight or privacy they enjoy or result in an un-neighbourly sense of enclosure or loss of outlook. Local Plan Policy E(a) seeks to protect neighbouring amenity by stating that planning permission will not normally be granted for developments unless it can be demonstrated (or secured by appropriate planning condition) that the proposals will not result in unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit.

219 As set out within the site description in this report, the application site is currently located within an Opportunity Area that is promoted to undergo comprehensive regeneration through the Charlton Riverside SPD (2017) and supported in principle by London Plan and draft London Plan policy. In this central location of the Opportunity Area, the SPD regeneration objectives support the redevelopment and intensification of the low density, low rise industrial land use characteristic of the application site and surrounding land uses, towards a high density, mixed-use development model including higher density employment uses with residential uses. However, it is acknowledged that the existing residential properties at Atlas and Derrick Gardens immediately to the west of the site, which fall within the recently adopted Charlton Riverside Conservation Area due to their connection to the industrial heritage of the area, will remain in situ, in close proximity to the application site, and the sensitive nature of this somewhat unique existing residential context and the amenity of existing residents must therefore be considered in detail.

220 Greenwich Council cited as a reason for refusal that due to the height of the proposed buildings and their proximity to existing residential properties the proposed development would result in an unacceptable reduction in daylight and overshadowing of external amenity spaces to properties in Atlas and Derrick Gardens through overlooking. This loss of privacy and reduction in daylight and sunlight has also been noted in objections received as part of the application consultation. Notwithstanding this, it is noted that the Council's Planning Board report assessed the impact of the proposed development prior to the recent amendments, which was greater in scale at the closest parts to Atlas and Derrick Gardens, on neighbouring sunlight, daylight, and privacy in detail. The assessment concluded that while there would be some impacts upon the adjacent properties, a satisfactory level of amenity would be maintained for existing residents and any reduction would not be of such a magnitude to justify refusal of the application, particularly in light of the Opportunity Area designation and the desire for an intensification of employment and residential identified through the Charlton Riverside SPD. The planning board report also noted that the proposed development would bring about benefits to the general amenity of the area through the removal of unsightly vehicle parking from the area of land between Atlas and Derrick Gardens (proposed 'eco walk') and the provision of landscaping which would provide an improved environment in the vicinity of existing residential properties.

221 Since the Mayor took over the application for his own determination the applicant has worked with GLA officers to address this reason for refusal by further reducing the massing of those buildings in closest proximity to the existing residential properties, whilst optimising housing and affordable housing delivery. The revised massing has reduced the height of Buildings G and H on Plot A by two storeys and stepped in height to provide a predominantly three storey building with a fourth floor set back from Atlas and Derrick Gardens to more sensitively respond to the existing two storey properties. The separation distances between the proposed buildings and existing properties have been maintained. In addition, Building J on Plot B has also been reduced in height from seven to five storeys to reduce overlooking and overshadowing of the properties at Atlas Gardens. In order

to maintain the quantum of housing proposed and assist in scheme viability, one additional storey has been added to Buildings D, E and F which are considered to be in less sensitive parts of the site.

222 The following paragraphs provide a detailed assessment of the revised proposed development on the amenity of neighbouring properties. Greenwich Council in its consultation response have noted that the revised massing, whilst reducing overshadowing effects and improving daylight levels, does not overcome their previous concerns and the impact of the proposed buildings upon the amenity of neighbouring residents still remains a serious concern.

Daylight, sunlight and light pollution

223 Policy 7.6 of the London Plan requires new development to avoid causing ‘unacceptable harm’ to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines are to be applied sensitively to higher density development, especially in Opportunity Areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time. The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

224 As set out above, GLA officers note that the potential impacts on daylight/sunlight to existing residential properties have been raised throughout the consultation of this application and featured as a reason for refusal when the Council drafted its decision notice. The applicant has prepared a revised daylight and sunlight assessment within an addendum to the supporting Environmental Statement (ES) submitted in December 2018 and includes a detailed assessment of the likely impacts of the proposed development on the existing properties and associated amenity spaces at Atlas and Derrick Gardens and on Anchor & Hope Lane. The assessment methodology employed in the ES is in accordance with BRE’s “Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice” by PJ Littlefair (2011) which is accepted as good practice by Planning Authorities, in addition to national, regional and local policy legislation. Floor layouts have been obtained by the applicant for a number of properties within 1-30 Atlas Gardens and 21-40 Derrick gardens. Given the uniform design of these dwellings, with the exception of No’s 11-12 and 25-26 Atlas Gardens, it has been assumed that the layouts obtained are applicable to all of properties where the layouts are unknown.

225 The analysis is based on Building Research Establishment (BRE) Guidelines with specific reference to Vertical Sky Component and No Sky Line Contour for assessing daylight and Annual Probable Sunlight Hours (APSH) for assessing sunlight. It is noted that Average Daylight Factor has also been included for supporting information but is not used to determine significance of effect.

226 Vertical Sky Component (VSC): This method of assessment is a “spot” measurement of daylight, taken at the mid-point of a window. It represents the amount of visible sky that can be seen from that reference point from over and around the obstruction in front of the window. That area of visible sky is expressed as a percentage of an unobstructed hemisphere of sky and therefore represents the amount of daylight available for that particular window. The maximum VSC value is almost 40% for a completely unobstructed vertical wall or window. A window may be adversely affected if its VSC measured at the centre of the window is less than 27% and less than 0.8 times it's former value.

227 It should also be noted however that the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable.

228 No Sky Line Contour (NSC): This method is a measure of the distribution of daylight at the 'working plane' within a room. In houses, this translates to a horizontal plane 0.85 metres in height, such as a desktop. The NSC divides those areas of the working plane in a room which receive direct sky light through the windows from those areas of the working plane which cannot. If a significant area of the working plane lies beyond the NSC (i.e. it receives no direct sky light), then the distribution of daylight in the room will be poor and supplementary electric lighting may be required. The effect of daylight distribution in an existing building can be found by plotting the NSC in each of the main rooms. For residential dwellings, main rooms comprise living rooms, dining rooms and kitchens. Bedrooms can also be analysed, although they are considered less important by reference to the BRE guidelines.

229 Where the NSC value retains at least 80% of its existing value, the effect is considered to be of a negligible difference and occupants are unlikely to experience a noticeable change in daylight levels. Where the direct sky light is reduced to less than 0.8 times its former value, then this is considered to be noticeable. For the purposes of this assessment, the significance of these changes are considered to be minor between 20-29.9% reduction, moderate between 30-39.9% reduction and major when more than a 40% reduction.

230 Average Probable Sunlight Hours (APSH): In relation to sunlight and overshadowing, the assessment sets out an analysis of APSH of windows which face the site and are located within 90° of due south (as per the application of the BRE Guidelines). Any windows facing 90° due north need not be analysed as they have no expectation of sunlight. A window may be adversely affected if a point at the centre of the window receives for the whole year less than 25% of the APSH, including at least 5% of the APSH during the winter months (September 21 to March 21) and less than 0.8 times its former sunlight hours during either period, and for existing neighbouring buildings, if there is a reduction in total APSH which is greater than 4%.

231 To confirm, the BRE Guidance is intended for building designers, developers, consultants and local planning authorities. The advice it gives is not mandatory and should not be used as an instrument of planning policy. Of particular relevance, the Guidance states: *"This guide is a comprehensive revision of the 1991 edition of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice. It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location."* As stated above, the Guidance is based on a suburban model, and in urban areas such as this one, VSC values of less than 27% would be considered to maintain reasonable daylight conditions.

232 Daylight: The residential properties at 1-30 Atlas Gardens, 21-40 Derrick Gardens, and 1-8 Anchor & Hope Lane has been identified as being appropriate for assessment as a result of their proximity to the proposed development. The daylight to each neighbour has been assessed using the VSC and NSC methodologies. As set out above, VSC is used to assess the daylight received to each window and NSC is used to assess the daylight to each room. A total of 105 windows were identified as appropriate for assessment under the VSC method, which serve a total of 79 rooms identified as appropriate for assessment under the NSC method. The assessments indicate that properties at 1-10 Atlas Gardens, 25-28 Atlas Gardens, 21-40 Derrick Gardens inclusively would experience no noticeable change in daylight by reference to the BRE Guidance and the impact on the daylight and sunlight received would be negligible. The impact on daylight received to the remaining properties identified as appropriate for assessment are summarised below. Both VSC and NSC methodologies are considered in each case and the overall assessment is acceptable in the context.

233 With regards to 11-12 Atlas Gardens, the NSC assessment indicates that all rooms would comply with the suggest BRE targets. The VSC assessment indicates that 10 of the 16 windows assessed would achieve VSC levels in excess of 27% or more than 0.8 of their former values, thereby meeting BRE Guidance criteria in regard to VSC and would experience no noticeable change in daylight. Of the remaining 6 windows which would experience a noticeable change, this would be minor adverse (a reduction of 20-29.9%); and in all but one case, the rooms that would see a noticeable reduction, also be served by other windows that would see no noticeable change to VSC. The remaining window would retain a VSC level of 25.9% which is only marginally below the suggest BRE target of 27%, and as set out above within a range considered reasonable for an urban environment. As such, the impact on daylight amenity to 11-12 Atlas Gardens is considered to be acceptable.

234 The VSC assessment for the two windows assessed at 13-14 Atlas Gardens, which faces the existing buildings on the application site, indicate that the retained VSC levels would be 19.8% at ground floor and 24.6% at first floor. It is understood from typical floor layouts that the rooms served by these windows, are secondary single aspect bedrooms and have a lower requirement for daylight. With regards to the NSC assessment, one of the two bedrooms would experience no noticeable change to daylight levels, with the remaining bedroom experiencing a reduction of 22.5% which is marginally beyond the BRE target of 20%. Overall, and given the secondary nature of the effected rooms, the minor adverse impact on daylight amenity to 13-14 Atlas Gardens is considered to be acceptable.

235 The terraced nature, orientation and layout of the existing residential properties in Atlas Gardens and the proposed massing, results in similar effects to retained VSC and NSC daylight levels for properties at 15-16, 17-18, 21-22 and 23-24 Atlas Gardens as those described in the above paragraph, with the exception that the rooms tested in 23-24 Atlas Gardens comply with BRE targets for NSC. This is demonstrated by the results of the detailed assessment contained within the ES addendum. It is therefore considered that the minor adverse impacts to retained daylight levels at these properties that are marginally beyond the BRE guidance targets, but within a satisfactory range, are also acceptable.

236 The property at 19-20 Atlas Gardens has a loft conversion resulting in three additional windows that face the development and require assessment. Of the 5 windows, three would experience no noticeable change to daylight as a result of the proposed development. The remaining 2 windows, serving single aspect bedrooms, would experience minor adverse alterations to both VSC and NSC of a very similar magnitude to the neighbouring properties assessed above, and is therefore considered acceptable on the basis of the minor exceedance of the suggested BRE targets for an urban development context.

237 The property at 27-28 Atlas Gardens, also benefits from a loft conversion and therefore has 5 windows that would face towards the proposed development. The assessment indicates that all rooms would meet with the suggested BRE targets for NSC and 4 of the 5 windows would experience no noticeable effects to daylight due to their accordance with suggested VSC criteria. The remaining window would retain VSC levels of 22.1%, which is marginally above the suggested 20% target. The semi-detached, neighbouring property at 29-30 Atlas Gardens is similar in layout and orientation, with the exception of the loft conversion. The 2 windows assessed would experience minor adverse effects to daylight when using the VSC methodology and would retain levels of 19.3% at ground floor and 23.9% at first floor. It is noted that these windows serve single aspect bedrooms and therefore have a lower requirement for daylight and both rooms comply with the suggested targets for NSC. Similarly, to the conclusions drawn above, this level of divergence from suggested targets is considered acceptable in an urban regeneration context.

238 The two storey residential property at 1-8 Anchor & Hope Lane has 15 windows which will face the buildings on Plot B. A total of three of the windows would experience no noticeable

alteration to daylight conditions and 11 of the remaining 12 windows would experience minor adverse effects in the range of a 25% reduction. These windows would however still experience retained VSC levels ranging from 19.6 to 26.7% which is within an acceptable range. The remaining window would experience a moderate adverse effect, seeing a reduction in VSC levels from 22.7 to 14.7%. It is however noted that this room is served by another window which will experience a lesser, minor adverse impact. With regards to NSC, two rooms will experience reductions of 21.1% and 21.9% which marginally exceeds the suggested BRE target of 20%. All other windows will experience no noticeable light loss. Overall, this level of impact is considered acceptable.

239 It is noted that the overall daylight impact on neighbouring properties has lessened compared to the scheme considered by the Council's planning board as a result of the revised massing which has reduced the scale of buildings in closest proximity to the existing properties. As set out above, it is noted that only a single window will experience a moderate adverse impact, with all other affected windows experiencing minor adverse impacts that only marginally exceed guidance. The previous massing resulted in 8 windows experiencing a moderate impact with a single window experiencing a major adverse impact.

240 Sunlight: The scheme's impact on sunlight to surrounding properties was assessed for both annual probable and winter probable sunlight hours. A total of 42 windows face towards the application site and are located within 90° of due south and have therefore been assessed as per the application of the BRE Guidelines. A total of two windows show reductions in APSH levels beyond the BRE guidance targets. However, these are smaller secondary panes within a bay window and within rooms where the primary window is not oriented within 90° of due south. Overall, given the secondary nature of these windows, the overall impact to sunlight in these rooms is considered to minor adverse and is acceptable in this urban context.

241 Overshadowing: The proposed development's impact on nearby external amenity areas has also been assessed. All of the 38 external amenity areas identified as relevant for assessment would achieve direct sunlight to at least 50% of their area for 2 or more hours on the 21st March, or see a reduction of no more than 20% from baseline levels. In addition, the transient shadow cast by the proposed development is not considered to cause unacceptable impacts on nearby properties. This level of impact complies with BRE guidance and is therefore considered to be acceptable.

242 Solar glare: Reflective studies have been undertaken to establish any potential adverse effects upon road traffic around the site and has identified the potential for some local adverse impacts of minor to moderate significance. Some of these impacts can be mitigated through the use of a car visor, however, the ES recommends the use of low reflectivity glass for the upper floors of the west facade of buildings M and N to address this further. This will be secured by planning condition.

243 The Council's planning officers confirmed in their board report that whilst there would be some reduction in daylight and sunlight levels to some neighbouring properties, the level of impact would not be such to justify the refusal of the application, particularly in light of the Opportunity Area designation and the desire for an intensification of employment and residential uses identified through the SPD. It also acknowledged that concerns have been raised through the consultation about loss of daylight to the adjacent recording studio in Imex House, however, commercial premises are considered less sensitive to daylight reductions than residential properties, and any reduction in daylight levels to these premises would not constitute grounds for refusal. GLA officers concur with this view. It is also recognised that the level of significance of the daylight and sunlight impact has been lessened by the revised massing since the Council's determination of the application. Where losses do occur these are within acceptable levels, and any exceedance of the BRE targets are generally marginal in nature and reasonable within an urban regeneration environment.

Privacy and overlooking

244 It is recognised that Greenwich Council officers did not consider the previous massing of Buildings G and H, and the Buildings on Plot B to have an unacceptable overbearing impact or undue sense of enclosure to the properties in Atlas and Derrick Gardens. However, loss of privacy to properties in Derrick Gardens, Atlas Gardens and Anchor and Hope Lane through overlooking was cited within the Council's reasons for refusal. The applicant has sought to directly address this reason for refusal through the proposed reduction in height of Buildings G and H on Plot A and Building J on Plot B by two storeys, which, as set out above, has also helped further mitigate daylight and sunlight impact. It is considered that the proposed reduction in massing in those parts of the development that are in closest proximity, further positively improves the relationship with Atlas and Derrick Gardens compared to the previously considered design. The general separation distances of 16.5 to 18 metres between the rear walls of the properties and Buildings G and H, and approximately 30 metres between Atlas Gardens and 1-8 Anchor & Hope Lane, are considered appropriate to the urban regeneration context, and this in addition to the proposed further reduced scale would retain an acceptable level of privacy for existing residents and ensure the proposed development is not overbearing.

Noise

245 London Plan Policy 7.15 and draft London Plan Policy D13 seek to reduce and manage noise to improve health and quality of life and support the objectives of the Mayor's Ambient Noise Strategy. The draft London Plan outlines that residential development 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 development. Policy H5 of the Greenwich Local Plan states that new residential developments must achieve an acceptable level of noise insulation being achieved by means of sensitive design, layout and in developments vulnerable to transportation noise and vibration.

246 During the construction phase, there will inevitably be increased levels of noise experienced by nearby residential properties. This has been assessed in detail within the 2017 Environmental Statement with conclusions upheld as remaining valid in the Environmental Statement Addendum 2018. These impacts will be temporary, confined to normal working hours and will be controlled through a demolition and construction management plan, demolition and construction travel plan, and construction logistics plan and dust mitigation during demolition and construction measures. The submission and implementation of these management plans will be secured by condition and will mitigate the impacts of demolition and construction.

247 In addition to the above, the owner of Imex House, a recording studio adjacent to the northern boundary of Plot A, has made representations expressing concerns about the impact of prolonged construction noise and vibration on the ability to operate the studio and this has also been cited within the Council's reasons for refusal. As set out in the Council's planning board report, the impacts of noise during the construction phase upon the recording studio will be dealt with through the construction method statement and through the use of notices under Section 61 of the Control of Pollution Act 1974 whereby certain noise generating operations will be carried out at pre-agreed times. Furthermore, the applicant has committed to agreeing and funding suitable off site sound mitigation for the studio with the operators, prior to the occupation of the residential units and this will be secured by a planning obligation within the section 106 agreement. It should be noted that the studio currently operates in close proximity to the existing residential properties at Atlas and Derrick Gardens and there is no record of noise complaints. The proposed planning obligation to agree, fund and secure off site mitigation is therefore considered sufficient to satisfactorily address the concerns raised and the Council's reason for refusal on these grounds.

248 During the operational phase, potential noise impacts from the development on existing neighbouring properties are likely to be confined to noise from plant and services, as there are no inherently noisy activities proposed. A condition is imposed requiring details of plant and machinery associated with the development to be approved. This will ensure that noise from plant will be at least 10dB below background noise level, measured at the facade of the nearest noise sensitive premises, along with other mitigation such as screening. The proposed commercial, retail and community uses are considered to be compatible with residential uses and it is considered that any noise impact from these uses can be adequately controlled via the imposition of conditions limiting their operational hours.

Strategic Industrial Land, Safeguarded Wharves and Agent of Change

249 As set out in the site description, the application site is in the vicinity of Murphy's Wharf, Angerstein Wharf and Riverside Wharf which are all active and safeguarded for their industrial use, in this case for aggregates. Safeguarded wharves are afforded the highest level of protection within the London Plan and the draft London Plan continues to protect existing locations. London Plan Policy 2.17 and Policy E5 of the draft London Plan set out that proposals adjacent to Strategic Industrial Locations should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. This is reflected in London Plan Policy 7.26 and Policy SI 15 of the draft London Plan aims to increase the use of the Blue Ribbon Network for freight transport and requires that development proposals adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principles set out in Policy D12 of the draft London Plan. It is important to note that wharf uses are wholly dependent on the tidal Thames, and therefore operational uses do occur at any time, day or night. In this case the operations at the wharves include the unloading of dredger ships which create high levels of low frequency noise and has the potential to carry over a wide area, with the potential to affect the proposed residential properties. Such impacts relate to usability of external balconies, the level of sound insulation provided to internal spaces and the impact of noise on the ability to naturally ventilate internal spaces when required.

250 As part of the Council's assessment of the application and detailed discussions with the applicant, the Port of London Authority (PLA), the wharf operators and the Council's Environmental Health team, a set of noise criteria were agreed to be secured by planning condition to help inform the scope of mitigation required to achieve suitable internal noise levels within the proposed residential units and to prevent complaints from future residents. The criteria would set maximum noise levels for bedrooms at night and for habitable rooms during the day, taking into account mechanical ventilation to mitigate against overheating, and a maximum noise rating for wharf and dredger noise on balconies. A further condition requiring the applicant to submit and implement a scheme of testing and modelling of the internal and external residential noise environment to demonstrate that the criteria are met, in consultation with the Council, PLA and the wharf operators, was also agreed. The wharf operators and the Port of London Authority have confirmed that the implementation of such conditions would remove their objections in relation to noise. It is considered that, when taken together, the above conditions will ensure that an acceptable level of noise is experienced by future residents through the provision of further detailed testing, modelling and implementation and will help ensure the successful co-location of the proposed high-quality mixed-use development with London's valuable strategic industrial functions and accords with Agent of Change principles and Policy 7.26 and Policies SI15 and D12 of the draft London Plan.

251 The application site is also directly adjacent to the existing industrial operations at Stone Foundries, where an industrial fan is situated on the site boundary. The applicant has agreed to cover the cost of off site mitigation in form of a permanent noise dampening device to reduce the noise emitted from the fan. This has been previously reviewed and considered acceptable by the

Council's Environmental Health officer and will be secured within the section 106 agreement. As set out above, planning obligations will be secured within the section 106 agreement committing the applicant to work with the owners and operators of Imex House to agree and fund appropriate off site sound mitigation measures for the studios to ensure the successful co-location of the existing facilities and the proposed residential development.

252 On balance, the proposed development is considered acceptable subject to the imposition of appropriate planning conditions and obligations to secure details of appropriate noise assessment, mitigation, acoustic design and sound insulation to residential dwellings in accordance with Greenwich Local Plan Policy H5 and London Plan Policy 7.15 and is compliant with Policy D12 of the draft London Plan.

Wind

253 London Plan Policy 7.7 and draft London Plan Policy D8 state that tall buildings should not adversely affect their surroundings in terms of (amongst other things) microclimate and wind turbulence. The Mayor's Sustainable Design and Construction SPG identifies the Lawson Comfort Criteria as a means for identifying suitability of wind conditions.

254 The applicant modelled the impact of the proposals on the local wind conditions in the 2017 ES and reviewed and updated the assessment in the Environmental Statement Addendum 2018 to reflect the alterations to the scheme since. The mitigation proposed at the time, including specific planting, the use of high planters and solid balustrades to balconies, was considered suitable to mitigate the wind conditions created by the development and to provide a calm and comfortable pedestrian environment. The original assessment identified that the windiest conditions are likely to occur at the south-western corner of Building M, and the introduction of a curved facade on this building is likely to shift these conditions further along the facade. However, the updated assessment is satisfied that the previous mitigation secured in this location, a 1.5 metre high planter, will remain suitable to mitigate any change in conditions.

255 The updated assessment concludes that the increase in height of one story to Buildings C, D, E and F, and the removal of two stories at Buildings G, H and J is unlikely to cause a change in wind conditions previously modelled given the relatively small alterations to massing, relative to the overall height of the buildings. It is however acknowledged, that at worst, the proposed increases in height, may marginally increase channelling winds between Buildings C, D, E and F. Notwithstanding this, in light of the generally calm wind conditions at ground level, a slight increase in channelling wind speeds would still result in suitable and comfortable wind conditions with the landscaping strategy implemented. The current wind conditions are likely to change during the construction period, however, this will be mitigated through the erection of hoarding around the site which is secured by condition through the construction management plan.

256 Overall, the changes to wind conditions on the site would be suitably mitigated through the implementation of the landscaping strategy, and the development as proposed is not therefore expected to have any significant impact on wind conditions with regards to pedestrian safety and the proposed private and communal amenity spaces will be suitable for their intended uses. The proposals are therefore acceptable with regards to microclimate.

Natural environment

257 London Plan Policy 7.19 and draft London Plan Policy G6 require developments to make a positive contribution to the protection, enhancement and creation of biodiversity. Locally, Greenwich Policy OS4 stating biodiversity enhancements will be encouraged particularly in areas that are currently deficient in accessible wildlife sites. Greenwich policies OS(e) and OS(f)

emphasise the importance of development optimising and supporting wildlife and the benefit to biodiversity. The Local Plan identifies the southern part of the site as being within an area of wildlife deficiency and Policy OS(e) sets out that in or near to such areas, the Royal Borough will seek to secure opportunities for the provision of areas to be managed as wildlife habitat and seek to maximise access to suitable sites where this would not conflict with protecting habitats from disturbance.

258 The potential of the site to support a range of protected species has been assessed under the ecological assessment submitted in support of the application. Overall, it is concluded that there is low potential to support roosting bats in buildings, however, the retained trees may provide some potential for bat roosts, but there is no specific mitigation or licensing required. A precautionary bat survey is however secured by condition. In addition, no habitats to support amphibians or reptiles were identified within or adjacent to the site, and it is considered highly unlikely that the development would result in significant harm to any protected, rare or notable invertebrate populations. Badgers, water voles and otters are also unlikely to be affected, and lack of foraging and few nesting opportunities means that black redstarts are unlikely to be affected. The proposals would however provide new foraging opportunities and safeguarding measures for nesting birds with regards to vegetation clearance will be secured by planning condition, in addition to the details and provision of bat and bird boxes.

259 With the exception of a group of self-seeded sycamore trees at the north reaches of the river access route, all trees either on or adjacent to the site, including 16 mature London Plan trees subject to a Tree Protection Order fronting Anchor and Hope Lane, a Lawson Cypress and Wild Cherry Tree on the western boundary of Plot A, as well as a group of Lawson Cypress trees adjacent to north east of Plot A, will be retained. The proposals include other ecological enhancements to be secured by condition, including the removal of invasive species, new native planting, including plants of known wildlife value and the provision of wild flower grassland within public amenity spaces, such as the 'eco walk' and within the green roofs.

260 On the basis that the above design and mitigation measures would be secured by condition, officers are satisfied that the proposals would avoid harmful impact on wildlife, the ecology and biodiversity, and would provide for the suitable protection, enhancement and accessibility of the natural environment in accordance with strategic and local policy objectives.

Sustainability and climate change

261 London Plan climate change policies, as set out in Chapter Five, collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. London Plan Policy 5.1 (Climate change mitigation) sets out the strategic approach to reducing carbon emissions in London, and Policy 5.2 (Minimising carbon dioxide emissions) sets out an energy hierarchy for assessing applications. Policy 5.2 sets a minimum target for carbon dioxide emissions reduction in new buildings of 35% beyond Part L of the Building Regulations (as amended 2013) for commercial buildings and zero-carbon for residential buildings. London Plan Policy 5.3 (Sustainable design and construction) requires future developments to meet the highest standards of sustainable design and construction, and London Plan Policies 5.9-5.15 promote and support the most effective climate change adaptation measures including passive thermal regulation, urban greening, and water management.

262 Draft London Plan climate change policies are set out in chapter 9 and also collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, minimise carbon dioxide emissions and meet the highest standard of sustainable design. The policies go further than the current London Plan setting more stringent standards regarding air quality, greenhouse gas emissions, energy infrastructure, water infrastructure and

waste and the support for the circular economy. Draft London Plan Policy G5 (Urban Greening) states that all major development proposals should contribute to the greening of London.

263 The Mayor's Sustainable Design & Construction SPG sets out how these policies should be implemented.

264 At a local level, Greenwich Policy DHI requires all developments to meet the highest standard of sustainable design and construction, whilst Policy E1 seeks to minimise CO2 emissions and states that Carbon emissions should be reduced in accordance with the Mayor's energy hierarchy.

Energy

Energy strategy

265 The applicant has submitted a revised energy strategy for the site and is proposing to reduce carbon dioxide emissions by 54% beyond the 2013 Building Regulations for domestic buildings and 22% beyond the 2013 Building Regulations for non-domestic buildings. The applicant complies with the targets with the London Plan and draft London Plan target for the domestic element but falls short of the targets for the non-domestic uses. In reporting the application at Stage 1, it was observed that the scheme followed the London Plan energy hierarchy, with a range of passive design features and demand reduction measures proposed, Combined Heat and Power system (CHP) and renewable energy sources, and that the carbon savings met the London Plan's targets. The applicant has sought to address the concerns raised at Stage 1 and 2 since the Mayor took over the application for his own determination and provided additional information to the GLA. Further information/clarification has been provided across a range of issues including; energy efficiency, district heating and the combined heat and power network have been provided. It is however noted that the performance of the non-domestic element has worsened as a result of the further revisions and it is therefore necessary to secure the submission of a revised energy strategy prior to commencement on site that demonstrates that additional measures aimed at maximising further carbon reductions in line with London Plan and draft London Plan policy targets have been fully explored.

266 Energy efficiency (Be Lean): A range of passive design features, including orientation of dwellings and location of balconies, and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters would be improved beyond the minimum backstop values required by Building Regulations. An overheating analysis has been undertaken that demonstrates compliance under the DSY01 weather file and compliance with the DSY2 and DSY3 weather files could be achieved through the use of internal shading and enhanced mechanical ventilation during periods of prolonged heatwave.

267 District heating (Be Clean): The applicant carried out an investigation into whether there were any existing or proposed district heating networks within the vicinity of the proposed development. It was confirmed that the closest network is located at Greenwich Millennium Village but that the required pipeline (approximately 2 kilometres) is prohibitively expensive. However, the borough's energy masterplan envisages a potential transmission line through the site at some point in the future. The applicant is proposing to install a site heat network connecting all the proposed uses, which will be fed by an on-site CHP engine, and this system would enable future connection to an area wide network should one come forward in the future. In the absence of a specific timeline for the feasibility work for the transmission line, this approach is accepted. The applicant will be required to continue to prioritise connection through a S106 obligation.

268 Renewable technology (Be Green): The applicant has investigated the feasibility of a range of renewable energy technologies and has identified photovoltaics (PV) as the most suitable

renewable technology. A total of 1,377 sq.m. of PV panels is proposed and will be secured by planning condition.

269 Overall savings: With regard to the domestic elements, based on the energy assessment submitted, an on site reduction of 390 tonnes of CO₂ per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 54%. To achieve 'zero carbon' for the residential portion of the scheme, 328 tonnes per annum of regulated CO₂, equivalent to 9,840 tonnes over 30 years, from the new-build domestic portion should be offset offsite. A total of £590,400 will be due in offset payment if further reductions cannot be achieved on site following the submission of the updated energy strategy, as required by planning condition.

270 The non-domestic elements will achieve a reduction of 19 tonnes per annum, which is equivalent to 22%. To achieve 35% carbon reduction for the non-domestic portion of the scheme, 12 tonnes per annum of regulated CO₂, equivalent to 360 tonnes over 30 years, from the new-build non-domestic portion should be offset offsite. A total of £21,600 will be due in offset payment if further reductions cannot be achieved on site following the submission of the updated energy strategy, as required by planning condition.

271 Suitable planning conditions securing further carbon reductions, energy performance, BREEAM ratings, heating, cooling and power networks, future connection to district heat networks the provision and monitoring of renewable energy technologies and overheating, will be secured and ensure compliance with London Plan and borough policies on energy efficiency and carbon savings.

Flood risk and drainage

272 London Plan Policy 5.12 (Flood risk) and draft London Plan Policy SI12 seeks to ensure that developments address flood risk and incorporate flood resilient design. Policy 5.13 (Sustainable drainage) and draft London Plan Policy SI13 states that developments should use sustainable urban drainage systems (SUDS) and should ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy. London Plan Policy 5.13 and draft London Plan Policy SI13 seek to ensure new developments proposals achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy. Due to the sites location in Flood Zone 3 the NPPF requires that a sequential test is carried out.

273 Greenwich Policy E2 states that development should ensure that the consequences and probability of flooding will be reduced, where possible, and that there will be no increased risk of flooding elsewhere. The policy seeks that development will be safe through the layout, form and floor levels of the development and mitigation measures. Greenwich Policy E3 requires, because of the site's location within an area protected by flood defences but with a high residual risk classification should implement risk reduction measures with the primary aim of reducing risk to life.

274 The application is supported by a Flood Risk Assessment (FRA) which confirms the site is located within Flood Zone 3a in an area benefitting from River Thames tidal defences. Furthermore, it is acknowledged that these defences are expected to be maintained to provide a high level of flood protection for the foreseeable future via the Thames Estuary 2100 project. As set out in the Council's planning board report, the site and the wider Charlton Riverside Opportunity Area is identified for substantial growth through the redevelopment of brownfield land as part of a comprehensive regeneration strategy to deliver a new mixed-use urban neighbourhood that would meet local and strategic housing and employment needs. These benefits in addition to the safety measures and mitigation set out below and to be secured by planning condition are considered to adequately satisfy the requirements of the NPPF in relation to the sequential and exceptions test.

275 The supporting flood risk assessment (FRA) has analysed the risk of a breach in the tidal defences and this indicates that the site would be affected by a breach with potential flooding of up to 2.42 metres depth on site. For this reason, the Charlton Riverside SPD (2017) recommends that no habitable rooms should be provided at ground floor level, that slab levels should be raised to provide ground floors with an element of free board relative to flood levels; accommodation within basements or semi-basements should be avoided and refuge spaces and safe means of escape from dwellings in a flood event should be provided. As described elsewhere within this report, the proposed development provides duplex units with habitable accommodation on the ground floor within Plot A, however, these will be restricted to living, dining and kitchen areas, with all bedrooms at first floor, above modelled flood levels. This restriction is secured by planning condition, and the overall approach, coupled with the high degree of flood defence provided to the site, and subject to the flood warning and evacuation strategies also secured by condition, is considered acceptable. The site also has some areas of surface water flood risk. The above measures to mitigate a breach in tidal flood defences will reduce the risk from a surface water event.

276 During the statutory consultation process, prior to the Mayor's decision to take over the case for his own determination, the Environment Agency (EA) raised concerns with regards to the flood risk of the basement car park on Plot A and the associated evacuation strategy in a flooding scenario. Following the submission of further information demonstrating that users of the car park would have access to safe areas above the breach level, the EA confirmed that it was content for the development to go ahead in principle, subject to the submission of satisfactory information demonstrating the users of the car park would have sufficient time to evacuate the car park should it be flooded, to demonstrate it would not pose an unacceptable flood risk. This information will be secured by a pre-commencement condition.

277 In addition to the above basement evacuation information, a flood evacuation plan, the incorporation of flood resilient materials and design within the buildings to limit the damage, and/or enable a quick recovery in the unlikely event of a flood, finished floor levels, and the requirement for residents to register with the EA's flood warning service will be secured by condition and in accordance with the recommendations of the submitted Flood Risk Assessment. Separate evacuation plans for the creche in the event of a flood will also be secured by condition. Overall, the proposals have taken a broadly appropriate risk based approach to the unlikely event of serious flooding at the site, and the mitigation, further information and strategies referred to above and to be secured by condition would ensure the proposals are acceptable in terms of London Plan Policy 5.12.

278 Parts of the site are shown to be at risk of surface water flooding and some parts of the local vicinity are shown to be at extensive risk. The FRA states that the proposals will achieve a reduction of at least 86% in surface water discharge. This will be achieved by using green roofs on all buildings, swales, attenuation ponds and underground attenuation tank. The submission and approval of a drainage strategy in consultation with Thames Water will be secured by planning condition to ensure the drainage system and attenuation tanks can accommodate a wide range of storms, and to provide clarification of proposed connection points to the public sewer and the anticipated flow into the connection point. A water supply impact study will also be secured to ensure water supply infrastructure has suitable capacity to cope with additional demand.

279 The general aims of the drainage strategy respond well to the requirements of London Plan drainage hierarchy and the further information and requirements to be secured by planning condition referred to above will ensure the scheme fully complies with London Plan Policy 5.13 and Policy SI.13 of the draft London Plan, can be made safe and that it will not result in increased flood risk elsewhere.

Sustainability strategy

280 The applicant has submitted a Sustainability Statement for the site, which sets out many climate change adaptation measures proposed in the design and construction process. The statement advises that the key sustainability objectives for the development revolve around energy, transport, water resources, materials and supply chain, waste, biodiversity, pollution, climate change adaptation, and promoting the economic and social wellbeing of communities. These objectives will underpin the detailed design, construction and operational stages of the development. In terms of water consumption, the development is anticipated to achieve a water consumption target of 105 litres per person per day or less for all domestic properties and this is secured by planning condition. The target design consumption will be achieved through the use of water efficient fittings. In addition, a planning condition securing the non-residential component to a design that will achieve Building Research Establishment Environmental Assessment Method (BREEAM) 'Excellent' rating.

Trees and urban greening

281 London Plan Policies 5.10 and 7.21 seek to retain existing trees of value, or mitigate their loss, and require developments to incorporate urban greening measures. Draft London Plan policies G5 and G7 go beyond the London Plan policies by embedding urban greening measures and retention of existing trees of quality into the planning process. As set out in draft London plan Policy G5 the Mayor has developed a generic Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities. The factors outlined in Table 8.2 of the policy 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.

282 As referred to in paragraph 259 above, with the exception of a group of self-seeded sycamore trees at the north reaches of the river access route, all trees either on or adjacent to the site, including 16 mature London Plan trees subject to a Tree Protection Order on the western boundary of Plot B fronting Anchor and Hope Lane, a Lawson Cypress and Wild Cherry Tree on the western boundary of Plot A, as well as a group of Lawson Cypress trees adjacent to north east of Plot A, will be retained. This was reviewed by the Council's Tree Officer who raised no objection subject to conditions securing the implementation of tree protection measures. This has been secured. The wider soft landscaping proposals includes the planting of 167 new trees throughout the development comprising mostly native species within some exotic species. Given the currently low ecological value of the site, the proposals represent a significant habitat improvement including the planting of native trees, shrubs and wildflower grasslands, in addition to green roofs. as part of the wider soft landscaping proposals for the site as well as green roofs. The ecology on site will therefore be significantly improved via the proposed introduction of landscaped areas within the proposed amenity spaces, private gardens and site boundary areas. The detailed landscaping strategy and an associated ecological management plan will be secured by condition to ensure that the proposals meet London Plan Policy 5.10, Policy 7.21 and draft London Plan Policy G5 and G7.

283 The Urban Greening Factor has been calculated as 0.33. As such, it is considered that the proposals achieve an appropriate balance between the targets within Policy G5 of the draft London Plan which recommends a target of 0.4 for predominantly residential developments and 0.3 for predominantly commercial. In recognition of the significant improvements proposed over the existing situation this will ensure that the proposals provide for sufficient urban greening.

Conclusion on climate change and sustainability

284 The proposed development would minimise carbon dioxide emissions to meet London Plan and draft London Plan targets and local policy regarding climate change. The development would not increase flood risk and would deliver sustainable urban drainage benefits over the existing

situation at the site. The development has committed to achieve high standards in sustainable design and construction and will deliver significant ecological improvements through increased planting on site. In these respects, the development is in compliance with relevant planning policies regarding sustainability and adapting to climate change.

Other environmental issues

Air quality

285 London Plan Policy 7.14 (Improving air quality) seeks to ensure that new development minimises increased exposure to existing poor air quality and makes provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs)) and be at least “air quality neutral”. Draft London Plan Policy SI1 goes further to state that development within Opportunity Areas should propose methods of achieving an ‘air quality positive’ approach. Greenwich Local Plan Policies E(a), E(b) and E(c) all seek to minimise pollution by ensuring all new development does not result in unacceptable emissions of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit. The local plan establishes 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.

286 Greenwich has designated the entire borough an Air Quality Management Area (AQMA) due to exceedances of NO₂ (nitrogen dioxide) and PM₁₀ (a particulate matter which is 10 micrometres or less in diameter). The application site currently subject to poor air quality from existing road traffic and industrial uses.

287 The proposed impact on air quality during the demolition, construction and operational phases of development have been assessed in detail in the 2017 Environmental Statement and updated in the Environmental Statement Addendum 2018 to reflect the revisions. It is noted that the Council independently reviewed the environmental statement and was advised that the approach to air quality was acceptable and concluded that whilst dust mitigation would be required at the construction stage, no mitigation would be required in respect of the operational impacts of the development. The dust mitigation will be secured under the conditions relating to construction management and will be mitigated through standard control measures including appropriate site management, dust and emissions monitoring and dust suppression systems. The Environmental Statement Addendum 2018 has updated the air quality modelling in relation to massing, CHP boiler and car park extract locations, boiler plant changes, land use floor areas, energy demand and additional cumulative development traffic. The conclusions set out in the 2017 Environmental Statement remain valid for the amended scheme; in that the proposals will be air quality neutral and that the modelled NO₂ and PM₁₀ pollutant concentrations are not predicted to exceed any of the annual, daily or hourly objectives.

288 Further air quality assessment with regards to boiler emissions and additional monitoring for a period of 6 months prior to establish that the site is suitable for the creche use given the increased sensitivity of the use, are also secured by condition.

289 Objections were received which made reference to increases in pollution from increased car usage. The results of air quality assessment found that the revised proposals would be air quality neutral with regards to trip generation and building emissions and that the completed development would not have a significant effect on air quality. The proposed conditions are therefore considered appropriate to protect air quality for existing and future residents.

Waste

290 London Plan Policy 5.17 requires adequate provision for waste and recycling storage and collection and Policy 5.18 requires applicants to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials. Draft London Plan Policy S17 seeks to reduce waste and increase material reuse and recycling and promotes a circular economy. The policy also sets several waste targets including a strategic target of zero biodegradable waste or recyclable waste to landfill by 2026.

291 The submission of a Site Waste Management Plan will be required by a condition will ensure adequate waste management facilities are provided and will seek to encourage resource efficiency and material management during construction, directing construction waste away from landfill. With regards to operational waste, appropriately sized bin stores will be provided in the basements of Buildings A, B, C, D and F on Plot A and in the basement which serves all buildings on Plot B. The bin stores will be located close to the building cores for ease of access. Buildings G and H on Plot A will have a refuse store on ground floor which can be accessed directly from the servicing route on the Play street for the weekly collections. The building design has also considered the incorporation of storage space for residential recyclable waste, as per the commitment in the sustainability statement. The Council's Waste Services Team were consulted on the proposals prior to their consideration by its Planning Board and confirmed it was satisfied with the proposals subject to the above-mentioned condition. GLA officers note that these arrangements have not materially changed under the latest amendments.

Contaminated land

292 London Plan Policy 5.21 (Contaminated land) supports the remediation of contaminated sites and bringing contaminated land back in to beneficial use. Greenwich Policy E(e) states that A preliminary site investigation, prior to the determination of a planning application, will normally be required if a site is known to be, or is likely to have been, in contaminative uses. Where contamination is found, the Royal Borough will need to be assured that the development can be built and occupied safely without any adverse environment or health impacts, otherwise conditions requiring full remedial action will be imposed.

293 In light of the long standing industrial use of the site, it is likely to be subject to some degree of contamination. Notwithstanding this, the preliminary risk assessment undertaken and included in the 2017 ES identified limited contamination across the site, with the exception of a local pocket of hydrocarbon impacted perched groundwater in the northern extents of the application site.

294 Given that the proposed uses would be particularly vulnerable to the presence of contamination, conditions to ensure a thorough investigation of the ground conditions and likely sources of contamination, appropriate remediation if necessary, and a validation report if necessary to confirm that all potential contamination has been removed from the site prior to its first use would be secured. The Environment Agency has identified that the proposal may have an impact upon groundwater within underlying secondary aquifers. A condition is recommended in relation to piling to ensure that there is no unacceptable risk to groundwater.

295 Neither the Council, nor the Environment Agency raised objections to the application subject to the above conditions, which are necessary to ensure the new development poses no health risk to construction workers, future occupiers or controlled waters.

Aviation safety

296 Greenwich Policy Core Strategy Policy IM(d) states all applications to develop sites within the outer safeguarding boundary for London City Airport will be determined having regard to the advice received from the Civil Aviation Authority.

297 The relevant safeguarding consultee (London City Airport) has been consulted and has raised no objection subject to a condition requiring details to be submitted in relation to cranes. Appropriate conditions are included in the recommendation.

Conclusion on other environmental issues

298 The proposed development has committed to achieve high standards in air quality and dust management during construction and operation. Conditions will ensure a best practice approach to construction waste management and remediation conditions and secure that any contamination, expected or unexpected, is appropriately mitigated against. In these respects, the development is in compliance with relevant planning policies regarding air quality, waste and contaminated land.

Transport

299 At paragraph 102, the NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- potential impacts of development or on transport networks can be addressed;
- opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- opportunities to promote walking, cycling and public transport use are identified and pursued;
- the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- patterns of movements, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

300 London Plan Policy 6.1 applies these principles within the strategic approach for transport in London. Other relevant strategic transport policies in this case include: Providing public transport capacity and safeguarding land for transport (Policy 6.2); Assessing effects of development on transport capacity (Policy 6.3); Enhancing London's transport connectivity (Policy 6.4); Funding Crossrail and other strategically important transport infrastructure (Policy 6.5); Better streets and surface transport (Policy 6.7); Cycling (Policy 6.9); Walking (Policy 6.10); Smoothing traffic flow and tackling congestion (Policy 6.11); Road network capacity (Policy 6.12); Parking (Policy 6.13); The Mayor's priorities for planning obligations (Policy 8.2); and, Mayoral Community Infrastructure Levy (Policy 8.3).

301 The Mayor's Transport Strategy (2018) (MTS) looks to put people's health and quality of life at the very heart of planning the city's transport with an aim that by 2041, 80% of all Londoners' trips will be made on foot, by cycle or by public transport. The MTS seeks to impose high expectations on developers to deliver transport solutions that will promote sustainable mode shift, reduce road congestion, improve air quality and assist in the development of attractive, healthy and active places. It will also seek to restrict car parking provision within new developments, with those locations more accessible to public transport expected to be car free or car-lite. Provision for car parking should be minimised and designed for alternative uses in the future as car dependency decreases.

302 The aspirations of the Mayor's Transport Strategy are embedded in the policies of the draft London Plan particularly the policy approaches such as 'Healthy Streets', 'Good Growth' and the

Mayoral mode share targets. Draft London Plan Policy T1 sets the Mayor's strategic target of 80 per cent of all trips to be made by foot, cycle or public transport by 2041. Draft London Plan Policy T2 seeks to ensure that development proposals deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Draft London Plan Policies T3-T6 seek to enable the achievement of the Mayor's strategic target.

303 Greenwich Local Plan Policy CM4 states that all development in Royal Greenwich should contribute to improved accessibility and safety and reduce the use of the private car and the need to travel. Development should be designed for the needs of pedestrians, cyclists and public transport users first and intense uses should be close to public transport, cycling and pedestrian nodes and interchanges to enhance connectivity. Local Plan Policy IM5 seeks to minimise the impact of the movement of goods and materials on the road network by encouraging sustainable freight practices. The Policy states that London Plan standards should be applied to new parking proposed in the borough.

304 Issues with respect to transport were considered by the Council as having been satisfactorily addressed, subject to agreement of appropriate planning conditions and section 106 obligations to secure necessary mitigation measures. Transport does not feature in the Council's proposed reasons for refusal. The Mayor's initial representations to the Council when it was the determining authority concluded that some further work was required on demonstrating how the proposals fit with the wider SPD transport objectives, local bus network enhancements, car parking, cycle parking, for access and travel, delivery and servicing, and construction logistics planning. The applicant has engaged with GLA and Transport for London (TfL) on these matters following the Mayor's decision to take over the application for his own determination and these matters have been satisfactorily resolved subject to planning conditions and section 106 obligations.

Public transport accessibility

305 It is noted that the site falls within the Charlton Riverside Opportunity Area and that Opportunity Areas are expected to contribute to delivering the Mayor's mode share targets of 80% of all trips in London to be made by walking, cycling or public transport by 2041. The site is primarily served by buses with Charlton National Rail station situated approximately 350 metres to the south of the site, providing access to National Rail services to London Bridge, Cannon Street and Dartford. Bus routes 472 and 486 serve bus stops within 300 metres of the site, providing direct links to Greenwich Peninsula, Plumstead, Thamesmead and Bexleyheath. Access to London Underground or Docklands Light Railway (DLR) services are some considerable distance away and as such the Charlton Riverside Opportunity Area currently records a low Public Transport Accessibility Level (PTAL) score in many areas. It is however recognised that the application site benefits from a more accessible location when compared to other emerging development sites in Charlton Riverside SPD area, with readily available access to public transport services via convenient walking/cycling routes that are not reliant on the wider, significant transport interventions outlined in the SPD to justify high density mixed-use residential development.

306 PTAL is measured on a scale of 0 to 6b where 6b is the most accessible and using TfL's WebCAT tool, it can be seen that the site records a range of PTALs from 4 in the southern end to 2 at the northern end. The applicant has produced a bespoke PTAL assessment report as part of the application, which provides justification for the site having an average PTAL. Seven points around the boundary of the site have been identified and the PTAL calculated for each, with the average score of each point being taken to calculate the PTAL of the site. Having reviewed this assessment, TfL is satisfied with the analysis undertaken and agrees with the average PTAL score of 4.

Site access

307 The overall access arrangements to the proposed development remain as per the 2017 submission. However, the December 2018 revision, relocates the entrance to the basement car park for Plot A from underneath Block F to underneath Block A. This alteration is wholly within the site roads within the site boundary and therefore does not impact on the surrounding network. As per the previous arrangement, the car park will be accessed by a two-way vehicle ramp with a gradient of 1:10. The applicant has provided tracking plans and swept path analysis to the car park and servicing area of the site and the visibility and clearance is satisfactory.

308 Representations have been received raising objections to the proposals on the grounds that it fails to provide safe and convenient access to Imex House, and it is noted that this is cited as a reason for refusal by the Council. The proposed design maintains access to the premises via the proposed 'play street' between Building G and H, and D and EF and swept path analysis has been provided demonstrating that is sufficient space for a 13.1 metre long Van Hool TX25 tour bus to enter and leave the site safely within the proposed access arrangements, which adequately addresses the concerns raised. Details of vehicular access and management within the site will be secured by condition.

Trip generation

309 The trip generation methodology used for assessing the site was discussed in detail at the pre-application stage, during the previous consultation prior to the Mayor's decision to takeover the application for his own determination and agreed. The transport assessment provides a comparative assessment between the independently undertaken surveys selected for the assessment of this site, available TRICS surveys and other recently consented developments in the local area (Greenwich Peninsula and Greenwich Millennium Village). From a detailed review of this comparative assessment and the characteristics of the independent surveys, TfL can confirm that the methodology proposed to assess the trip generation for the residential element of this particular site is appropriate and acceptable.

310 The approach to the assessment of the non-residential trip generation is also accepted taking to account the more defined uses and using the highest likely trip generating land use (B1). In summary, the original trip generation assessment continues to be valid for the amended scheme and aims to minimise vehicle trips to and from the site in line with current London Plan policy 6.11 and Policy T2 of the draft London Plan.

Charlton Riverside East-West connection/transit route

311 TfL with support from RB Greenwich is actively developing proposals for a bus transit scheme in the borough, with a longer term vision to provide a transit connection between Woolwich and North Greenwich via Charlton Riverside. To facilitate this, the Charlton Riverside Masterplan SPD indicates that a new east-west highway connection will be provided through the Charlton Riverside area, which could form part of a future bus transit route. This would maximise public transport accessibility across the site and has the potential to provide high levels of public transport capacity and service reliability through a combination of high quality bus priority and other quality of service elements. The VIP trading Estate site forms the western gateway to this new route, and it therefore is of strategic importance to ensure suitable provisions for a potential bus transit route are in place as part of this development, to ensure that the remainder of Charlton Riverside can be developed in line with the principles of Good Growth.

312 As set out in the SPD this would require a highway based link of 24 -27 metres in width, which is capable of accommodating two lanes of traffic, a bus lane in each direction, cycle lanes,

pavements and landscaping. The applicant has amended the scheme in response (by cutting back the footprint of the buildings on Plot B) in order to allow sufficient width for this new highway based connection to be delivered in future. An indicative layout has also been submitted which shows how this new connection might be delivered. A section 106 clause is recommended in order to safeguard the land required within the application site to construct the access road together with a £2.1m financial contribution towards the routes delivery. It is considered that adequate provision has been made within the scheme to deliver the future roadway and as such this is considered acceptable. Two potential options have been identified that could deliver this route through the site and further discussions will be required between Greenwich Council, the applicant and TfL as this proposal develops.

Bus and train network

313 During pre-application discussions, a bus assessment was requested to determine future service provision in the area. The applicant has undertaken a detailed study of the predicted bus trip distribution as contained within an appendix to the transport assessment. The bus analysis report evaluates the level of bus trips which could be expected to be generated by the proposed development and the distribution of these trips by journey purpose across six relevant time periods.

314 The assessment identifies that the development will generate approximately 253 additional users in the AM peak and 207 in the PM peak. In addition to this there is expected to be significant development across the Charlton Riverside Opportunity Area, so the already congested nature of bus services, especially those accessing Greenwich Peninsula during the peak periods, could experience further crowding. As such and following a detailed review of the trip generation analysis, a contribution of £830,000 to facilitate improvements to the bus network and mitigate the expected increase in demand will be secured in the section 106 agreement.

315 As agreed with TfL, Census mode share data has been used to determine multi-modal trip generation and split. The total number of trips using rail via Charlton station in the AM peak hour is 93 two-way trips (both residential and commercial). With Charlton Station being served by 8 trains per hour in each direction during weekday peak times, the expected impact at the station is expected to be relatively small.

Walking and cycling

316 The transport assessment includes a short assessment on the widths and the quality of the footways surrounding the site and a PERS-type audit of the area has been undertaken, which identifies a limited number of improvement options. There are improvements identified to the local public realm, walking and cycling facilities outside of the site boundary, and these are welcomed as it is apparent there is plenty of scope to improve the area in order to promote pedestrian and cycle movements to and from the site in accordance with the connectivity objectives of the Charlton Riverside SPD.

317 It is recognised that key to the success of sustainable travel by residents of the site will be encouraging cycling through the provision of improved infrastructure in the form of welcoming, safe, signed, and direct routes for cyclists to move through the area south to Charlton and north towards Greenwich Peninsula.

318 Whilst there is a lack of detailed analysis of local cycling conditions, the applicant has identified potential opportunities to contribute positively to the local pedestrian/cycle network, as set out Highway Works drawing (30821/AC/216 rev C). This plan details the introduction of a new staggered Toucan crossing on Bugsby's Way and the introduction of shared walking and cycleways adjacent to the site access. A contribution of £150,000 will be secured through the section 106 to

allow the local highway authority to implement these works. TfL should be consulted on any changes to the approved drawing to ensure they fit in with the overall movement strategy for the masterplan area. It may be that the nature, layout and form of Bugsby's Way will be changing as a result of the Woolwich Road Improvements undertaken by the Council and the proposals will need to be complementary to this.

Cycle parking

319 The December 2018 revisions amended the cycle parking provision to 1,400 spaces to comply with Policy T5 of the draft London Plan and is supported. The detailed design of the cycle parking should be as such to make it as easy, safe and convenient as it possibly can be to use a bicycle to get around the area.

320 The location and type of spaces for residents, employees and visitors will need to be carefully considered, including parking attributed to each block and the external access to them. Cycle parking areas should be able to be accessed without dismounting. The proposed provision will be met by a combination of double-stacker systems and a proportion of Sheffield Stands in order to cater for larger models of cycle which is welcomed. The exact split will be secured by condition. The London Cycling Design Standards recommend that at least 5 per cent of all spaces should be capable of accommodating a larger cycle (through Sheffield stands or similar). It is noted that shower and storage facilities will be provided for the proposed workspace.

Car parking

321 The development proposes to provide 208 car parking spaces, of which 56 will be provided as Blue Badge parking spaces (see inclusive design section for assessment of disabled parking provision). In addition, a further 14 existing spaces located at ground level on the eastern side of Plot B will continue to be used. This provides a total of 222 spaces at a ratio of 0.29 spaces per residential dwelling. The draft London Plan states that any development within Inner London Opportunity Areas should be car-free. However, the proposals have been in development for a significant period of time and the application was submitted prior to the publication of the draft Plan. Furthermore, it is also noted that although there are planned public transport infrastructure improvements, these will not be delivered before this application is determined and therefore some car parking provision is not unreasonable, subject to the monitoring and review of space usage with a view to reduce the total car parking allocation over time. This will be secured within the section 106 agreement.

322 The provision of at least 20% of all spaces with active provision of electrical vehicle charging points in line with London Plan Policy 6.13, with the remainder to have passive provision in line with Policy T6 of the draft London Plan, will be secured by condition.

323 The site currently lies outside the Charlton Controlled Parking Zone (CPZ). In order to control the demand for on-street parking it will be necessary to extend the CPZ (at the developer's expense) and also to restrict access to parking permits by future occupants of the development. Funding to review and extend these controls as necessary will be secured as part of the section 106 agreement.

Delivery, servicing, construction logistics and travel planning

324 A detailed and acceptable delivery and servicing plan has been produced for the development and will be secured by condition. The final plan should demonstrate the expected number and time of delivery and servicing trip to all parts of the site, with the aim of reducing the impact of servicing activity.

325 A limited amount of detail regarding construction arrangements for the site has been provided including an estimated construction vehicle trip generation. However, in accordance with London Plan policies, a Construction Logistics Plan identifying efficient and sustainable measures including trip consolidation; secure, off-street loading and drop-off facilities; and using operators committed to best practice (members of TfL's Freight Operator Recognition Scheme or similar) will be secured by condition. No development shall commence until this has been approved in consultation with TfL, in order to safeguard residential amenity and pedestrian and traffic safety.

326 The submission of the residential and workplace travel plan are welcomed and aim to promote sustainable travel to and from the site. Mode shift targets are to be set once baseline surveys are undertaken which is acceptable. The travel plan and all agreed measures therein are to be secured, enforced, monitored and reviewed as part of the section 106 agreement and supports London Plan Policy 6.11 and Policy T4 of the draft London Plan.

327 Should the Mayor determine to grant permission for the application, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

Conclusion on transport

328 The proposals for a high density, residential-led mixed-use scheme in this currently accessible site within the Charlton Riverside SPD area, that will deliver the gateway for a new key east-west transit route that is considered fundamental to unlocking the wider development potential of the Opportunity Area and delivering significant public realm improvements and north-south, east-west pedestrian connectivity, accords with the London Plan, draft London Plan and the wider regeneration objectives of the Charlton Riverside SPD (2017), with particular regard to connectivity.

329 Subject to a suitable framework of controls and mitigation as identified above being secured through the section 106 agreement and use of appropriate planning conditions, the transport impacts of this development are in accordance with strategic and local transport policies in the London Plan, draft London Plan and Greenwich Local Plan.

Mitigating the impact of development through planning obligations

330 At paragraph 54, the revised NPPF states that "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition."

331 At the regional level, London Plan Policy 8.2 sets out the Mayor's priorities for planning obligations, and states "Affordable housing; supporting the funding of Crossrail where this is appropriate (see Policy 6.5); and other public transport improvements should be given the highest importance". Draft London Plan Policy DF1 recognises that the most critical areas for investment, required to achieve the step change in housing delivery that London needs, are increased investment in transport infrastructure and fundamental changes to the housing market.

332 At a local level, Greenwich Council Policy IM1 establishes that the Royal Borough will ensure, through the use of conditions and planning obligations attached to planning permissions,

that all qualifying development provides for the infrastructure, facilities, amenities and other planning benefits that are necessary to support and serve it and to offset any consequential planning loss to the local area in a way that secures the best use of land and a properly planned, well designed, accessible and integrated environment provides guidance on obligations within the Greenwich Planning Obligations Supplementary Planning Document (SPD). The SPD lists the range of planning benefits that will be sought in relation to development proposals via s106 agreements include affordable housing; local employment and training; and non-strategic transport.

333 The Charlton Riverside SPD provides a list of infrastructure projects to support its housing and employment objectives. In addition to the new east-west transit route, infrastructure includes flood alleviation, primary and secondary schools, a major polyclinic located within the Neighbourhood Centre, public open space, potential green link/bridge connecting Eastmoor Street Park to Maryon Park, improvements to the Thames path, new Thames Clipper pier and a potential new civic waste facility. The SPD identifies that such infrastructure may be funded through a combination of CIL, section 106 funding or other government funding sources.

334 Pursuant to the consideration within the previous sections of this report, and in line with the policy context set out above, GLA officers propose to secure a number of planning obligations required to appropriately mitigate the impact of this development. Where appropriate, GLA officers have provided an additional commentary below to support the consideration within this report and to inform the detailed drafting of a section 106 legal agreement.

Affordable housing

335 As discussed in the housing section of this report, 292 affordable units would be secured, comprising 165 London Affordable Rent units and 127 shared ownership units on a grant funded basis, with a fallback position of 35% affordable housing should grant not be forthcoming. Details of affordable housing definitions, fit out, transfer/lease to a Registered Provider, the income thresholds for the intermediate accommodation, rent levels for the affordable rented units and the retention of the affordable units at the proposed rent levels, would be set out in the section 106 agreement. All affordable rent units would be secured at London Affordable Rent (LAR), which is set out in the housing section. With regard to the Intermediate tenure, all of the shared ownership properties would be offered to eligible purchasers on household incomes of less than £90,000 starting at £55,000 for one bed units, £71,000 for two bed units and £85,000 for three bed units. There will also be an agreement protocol for the Council to advertise to individuals living and /or working in the Borough in the first instance; to use reasonable endeavours to keep service charges for affordable tenants to a minimum and the formation and operational requirements of a Management Company.

336 GLA officers propose an early and late stage review mechanism. An early implementation review mechanism, which would be triggered if the development has not been substantially implemented within two years of the date of consent, in line with the Mayor's SPG standard formulae. A late stage review mechanism triggered on disposal of 75% of the residential units in line with the Mayor's SPG standard formulae. Any review must be submitted to the GLA for robust review and verification.

Transport

337 The following transport mitigation and improvement measures would be secured:

- a) Travel Plans and contribution of £1,260 towards monitoring;

- b) East West Access Road contribution of £2,100,000 towards delivery of route and the safeguarding of land within the site for delivery of the route;
- c) Bus service enhancement contribution of £830,000;
- d) Car Club – a commitment to providing car club scheme in the vicinity of the site for a period of 5 years in addition to £3,000 index linked towards Council’s cost of making a traffic order and £500 index linked per car club parking bay road markings, plus a £231,300 payment to provide membership to future occupants for a period of 5 years;
- e) Monetary contribution of £10,000 to facilitate the investigation and implementation of the extension of the CPZ zone to include the surrounding area;
- f) Parking permit exemption for future residents;
- g) Pedestrian and cycle network improvements contribution of £150,000;
- h) Cycle training contribution of £15,420;
- i) A car parking management plan, including monitoring and review of usage with a review to reducing provision.

The above will be secured to in order to ensure that the site functions efficiently, minimises transport impacts on surrounding sites and the road network and promotes sustainable transport principles and travel.

Employment and training

338 The following employment and training measures would be secured:

- a) Commitment and participation towards GLLaB and business support including £40,690 contribution towards commercial employment and training and £771,000 towards residential employment and training;

This will be secured to ensure that the scheme adheres to the requirements of the Council’s Planning Obligations SPD and recognises the importance of employment and training assets for the local community.

Other obligations

339 Other obligations would be secured as follows:

- a) Sound proofing to Imex House;
- b) Stone Foundries noise dampening measures;
- c) Business relocation strategy;
- d) Marketing strategy for non-residential floorspace to include details of how and where the units will be marketed and rental levels to ensure these are being marketed at a reasonable rate;
- e) Local workspace strategy including commitment to long lease with workspace provider, agreed affordable price point for provider and target end users, rent increase pegged to RPI, co-design of space to ensure it meets the requirements of end users and support for fit out costs;
- f) Scheme for establishing links with local education establishments;
- g) Provision of 17 sq.m. floorspace allocated within building on Plot B for use as police facilities;
- h) Agreement to community use of spaces within Plot A;
- i) Carbon offset contribution – to be calculated following the submission of revised energy strategy secured by planning condition;
- j) Entering into Agreement under Section 278 of the Highways Act 1980;

- k) Payment of legal, engineers cost;
- l) Payment of S106 monitoring costs.

These requirements will be secured to appropriately off-set any harm arising from the scheme which has not been appropriately mitigated through planning conditions.

Legal considerations

340 Under the arrangements set out in Article 7 of the Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990 the Mayor is the Local Planning Authority (LPA) for the purposes of determining this planning application (LPA ref: 16/4008/F).

341 Section 35 of the Greater London Authority Act 2007 inserts section 2F into the Town and Country Planning Act 1990 a requirement that for applications the Mayor takes over, the Mayor must give the applicants and the LPA the opportunity to make oral representations at a hearing. He is also required to publish a document setting out:

- who else may make oral representations;
- the procedures to be followed at the hearing; and,
- arrangements for identifying information, which must be agreed by persons making representations.

342 The details of the above are set out in the Mayor's Procedure for Representation Hearings which reflects, as far as is practicable, current best practice for speaking at planning committee amongst borough councils.

343 In carrying out his duties in relation to the determination of this application, the Mayor must have regard to a number of statutory provisions. Listed below are some of the most important provisions for this application.

344 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that in dealing with such an application the authority shall have regard to:

- a) The provisions of the development plan, so far as material to the application;
- b) Any local finance considerations, so far as material to the application; and
- c) Any other material consideration.

345 Section 70(4) defines "local finance consideration" as:

- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
- b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.

346 In this context "grants" might include the Government's "New Homes Bonus" - a grant paid by Central Government to local councils for increasing the number of homes and their use.

347 These issues are material planning considerations when determining planning applications or planning appeals.

348 Furthermore, in determining any planning application and connected application, the Mayor is required by section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the

application in accordance with the Development Plan (i.e. the London Plan and the adopted Local Plan) unless material considerations indicate otherwise.

349 Other guidance, which has been formally adopted by Greenwich Council and the GLA (e.g. Supplementary Planning Documents and Supplementary Planning Guidance), will also be material considerations of some weight (where relevant). Those that are relevant to this application are detailed in this Representation Hearing report.

350 Officers are satisfied that the current report to the Mayor has had regard to the relevant provision of the Development Plan. The proposed section 106 package has been set out and complies with the relevant statutory tests, adequately mitigates the impact of the development and provides necessary infrastructure improvements.

351 As regards Community Infrastructure Levy (CIL) considerations, a Mayoral CIL payment will be required.

352 In accordance with his statutory duty in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor is required to give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by the proposed development.

353 Where the Mayor takes over an application, he becomes responsible for the section 106 legal agreement, although he is required to consult the relevant borough(s). Both the Mayor and the borough are given powers to enforce planning obligations.

354 When determining these planning applications, the Mayor is under a duty to take account of the provisions of the Human Rights Act 1998 as they relate to the development proposal and the conflicting interests of the applicants and any third party affected by, or opposing, the application, in reaching his decision. Planning decisions on the use of land can only be taken in line with the Town and Country Planning Acts and decided in accordance with the development plan unless material considerations indicate otherwise.

355 The key Articles to be aware of include the following:

- (a) Article 6 - Right to a fair trial: In the determination of his civil rights and obligations... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
- (b) Article 8 - Right to respect for private and family life: Everyone has the right to respect for his private and family life, his home and his correspondence.
- (c) Article 1 of the First Protocol - Protection of property: Every person is entitled to the peaceful enjoyment of his possessions.

356 It should be noted, however, that most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted i.e. necessary to do so to give effect to the Town and Country Planning Acts and in the interests of such matters as public safety, national economic well-being and protection of health, amenity of the community etc. In this case this Representation Hearing report sets out how this application accords with the Development Plan.

357 Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are now statutory tests.

358 The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

359 The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.

360 Officers are satisfied that the application material and officers' assessment has taken into account the equality and human rights issues referred to above. Particular matters of consideration have included provision of accessible housing and parking bays, the provision of affordable and family housing and the protection of neighbouring residential amenity.

Conclusion

361 As detailed above Section 38(6) of the Planning and Compensation Act 2004 requires the decision to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

362 When assessing the planning application, the Mayor is required to give full consideration to the provisions of the Development Plan and all other material considerations. He is also required to consider the likely significant environmental effects of the development and be satisfied that the importance of the predicted effects and the scope for reducing them, are perfectly understood.

363 When considering the proposals, GLA officers have given special attention to the desirability of preserving the setting of Charlton Riverside Conservation Area.

364 This report has considered the material planning issues associated with the proposed development in conjunction with all relevant national, regional and local planning policy, and has found that the proposed development is acceptable in terms of land use principles (including industrial land, housing, employment, community and retail uses); housing (including affordable housing, housing tenure, mix, density and housing quality) urban design (including layout, landscaping, height and massing, architectural quality and appearance, heritage, fire safety and designing out crime); inclusive design; neighbouring amenity impacts (including privacy/overlooking; noise/disturbance); natural environment; sustainability (including climate change mitigation and adaptation, including sustainable drainage); other environmental considerations (including air quality, contaminated land and waste management), transport, including the provision of parking, and; mitigating the impact of development through planning obligations and conditions.

365 Taking the development plan as a whole, it is considered that the proposals accord overall with the development plan and it is not considered that there are any material considerations indicating that the proposal should be refused, notwithstanding its overall compliance with the development plan. Accordingly, the recommendations set out at the beginning of this report are proposed.

366 It has been concluded that overall the proposed development accords with the development plan. No conflict with the NPPF has been identified. As a result, applying the NPPF Paragraph 11,

the view is reached that the proposed development represents sustainable development. Applying section 38(6) of the 2004 Act, it is concluded that there are no material considerations which indicate that planning permission should be refused that are of sufficient weight to outweigh the support of the development plan and the NPPF.

367 Accordingly, the recommendations set out at the beginning of this report are proposed.

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