



CHARLTON RIVERSIDE

PHASE 1

PLANNING STATEMENT



Report

Bilfinger GVA
65 Gresham Street
London
EC2V 7NQ

Planning Statement

Charlton Riverside

Leopard Guernsey Anchor Propco Ltd

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1. Introduction

- 1.1 This Planning Statement has been prepared in support of a full planning application made for residential-led mixed use redevelopment of the VIP Industrial Estate and the VIP Trading Estate (the 'Application Site') in the Royal Borough of Greenwich ('RBG'). The Application is submitted on behalf of Leopard Guernsey Anchor Propco Ltd ('the Applicant').
- 1.2 The application site is located within the Charlton Riverside Opportunity Area, which is identified for significant residential growth by the London Plan and allocated as a Strategic Development Location by the Royal Borough of Greenwich (RBG) Core Strategy. The proposed development will deliver a high-quality mixed use development including 975 new homes across a mixture of tenures (including on-site affordable), a new 1 ha public neighbourhood park, residential gardens, and supporting commercial and community facilities. The application is the culmination of extensive pre-application consultation undertaken with the Greater London Authority (GLA), RBG, other statutory stakeholders and local residents and businesses, the details of which are set out in the submitted Statement of Community Involvement.
- 1.3 This Planning Statement has been prepared by Bilfinger GVA on behalf of the Applicant. Its purpose is to set out the planning rationale that underpins the proposed development and to demonstrate its acceptability in planning terms. The Statement is structured as follows:
- **Section 2** describes the Site and its surrounds;
 - **Section 3** describes the proposed development and the application specification;
 - **Section 4** sets out the national, regional and local planning policy framework against which the application will be considered;
 - **Sections 5-9** evaluate the proposal in the context of relevant planning considerations;
 - **Section 10** sets out the draft heads of terms; and
 - **Section 11** summarises our conclusions in support of the application.

2. Site and Context

Site and Surrounds

- 2.1 The site is located within the wider Charlton Riverside, a predominantly industrial area stretching between Woolwich to the east and Greenwich Peninsula to the west which is designated by the London Plan for significant residential growth and regeneration.
- 2.2 The Site comprises two parcels of land referred to as 'Plot A' and 'Plot B', together extending to a total area of 2.53 hectares (ha).
- 2.3 Plot A is the northern-most plot. It is bound by commercial/industrial units to the north, east and south and residential properties at Atlas Gardens and Derrick Gardens and Anchor and Hope Lane to the west. Plot A currently comprises three large buildings of approximately three storeys in height with surrounding hard standing. A number of businesses occupy the site and operate across a variety of use classes (B2, B8 and Sui Generis).
- 2.4 Plot B is bound by Atlas Gardens to the north; commercial/industrial units to the south and east; and Anchor and Hope Lane to the west. Plot B comprises a single building circa two storeys in height with surrounding hard standing that is currently occupied by a van hire company (Sui Generis).
- 2.5 There is limited vegetation on site, indicative of its industrial use. There are 16 mature London Plane trees within the western boundary of the site which are subject to Tree Protection Orders (ref. TPO253). A small number of semi-mature and mature London Plane trees are also present at the site's south eastern boundary.
- 2.6 Currently, the only access to the site is via a single lane private road off Anchor and Hope Lane, which also serves adjacent industrial businesses to the east.
- 2.7 The site is approximately 350m from Charlton Station, with frequent services to Central London, including Cannon Street (24 minutes), Charing Cross (30-34 minutes) and London Bridge (17-20 minutes). Bus services run along Anchor and Hope Lane and provide regular access to North Greenwich, Woolwich and beyond. Crossrail is due to open in 2018, with 12 trains per hour from Woolwich. There is also an aspiration to provide a new River Bus pier at the Charlton Riverside. The site has a PTAL rating of 4 and there is an expectation that this will be increased in future as the wider area is redeveloped.
- 2.8 The site is not located within a conservation area and does not contain any listed buildings or structures, or any nationally designated heritage assets.

Planning History

2.9 A planning history search for the site has revealed no applications of relevance.

3. Proposed Development

3.1 The development proposals will deliver a sustainable residential-led development supported by complementary uses that together will optimise the development potential of the site and help meet increasing demand for housing within RBG and London. It will provide high quality public realm and open space, significantly enhance connectivity, and will act as a benchmark and catalyst for future development within the wider area. The proposals include:

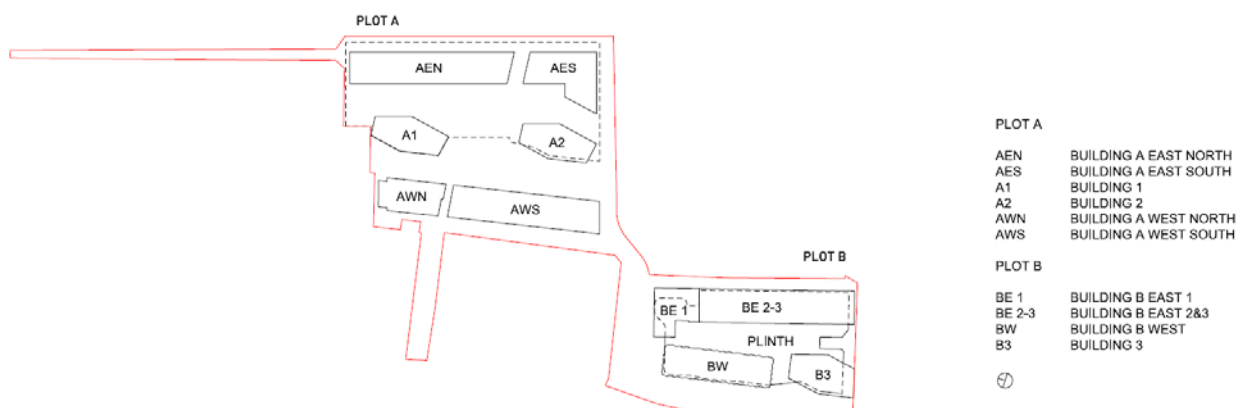
- 975 residential units provided within 9 buildings ranging in height from 2 to 28 storeys, including extensive private gardens and roof terraces.
- 1,560 sqm (GIA) of office space
- Ancillary residential facilities including gym, swimming pool, changing rooms totalling 864 sqm (GIA);
- 690 sqm (GIA) of flexible retail/restaurant/café/leisure use;
- 407 sqm (GIA) of community uses;
- Extensive external public realm improvements and landscaping; and
- Parking, services, plant and circulation.

3.2 The proposed Description of Development as follows:

'Demolition of existing buildings and erection of nine buildings ranging from 2 to 28 storeys in height for Class C3 (Residential Use), with Class B1 (Employment Floorspace) and flexible uses comprising A1 (Retail), Class A3 (Café/ Restaurant), Class D1 (Community Use) and Class D2 (Leisure) at ground floor and first floor level, alterations to existing vehicular access and creation of new pedestrian access from Hope and Anchor Lane and the riverside, creation of new areas of open space and landscaping together with the provision of associated car parking, cycle space, refuse and recycling storage, plant and all other associated works'

3.3 A key of the proposed buildings is shown in Figure 3.1 below.

Figure 3.1 Proposed Building Key



Land Use and Amount

- 3.4 The proposed land uses are Use Class C3 (residential) with supporting Class B1 employment space and flexible uses comprising Class A1 (retail), Class A3 (Café/ Restaurant), Class D1 (Community Use) and Class D2 (Leisure) at ground floor and first floor level to activate the public realm and support job creation. The proposal includes ancillary leisure facilities for the use of residents, including a gym, swimming pool and associated changing rooms.
- 3.5 Table 3.1 below summarises the quantum of floorspace proposed in each land use in each building and across the site as a whole.

Table 3.1 Proposed Land Uses and Floorspace (sqm GIA)

Building Ref.	Residential* (Class C3)	Office (B1)	Flexible (A1/A3)	Community (D1/D2)	Ancillary Service/ Parking/Plant
A1	5,895	-	-	407	9,174
A2	5,152	-	-	-	
AEN	9,913	519	-	-	
AES	7,161	922	-	-	
AWN	1,923	-	-	-	
AWS	4,502	-	-	-	
B3	10,571	119	78	-	
BE1	1,716	-	295	-	
BE2&3	10,501	-	-	-	
BW	5,220	-	317	-	
Total	62,553	1,560	690	407	

*Includes residential facilities.

Residential Accommodation

- 3.6 The proposal will deliver 975 new, high quality homes across a range and mix of unit types and sizes. The proposed housing mix is set out in Table 3.2 below and has been developed with reference to adopted planning policy targets and local demand.

Table 3.2 Proposed Housing Mix

Unit Type	Total
1 bed 1 person	168 (17.2%)
1 bed 2 person	227 (23.3%)
2 bed	306 (31.4%)
3 bed	253 (25.9%)
4 bed	21 (2.2%)
Total	975

- 3.7 The proposals include a high proportion of larger sized units which have been designed specifically for families in mind. Family sized units are provided with generous private outdoor space, and are located within easy access of communal amenity space.
- 3.8 The proposal includes 143 affordable homes (equating to 15% of total provision), which the Viability Assessment submitted in support of the application confirms is the maximum viable quantum of affordable housing which can be provided. Affordable units will be located in both Plot A (in Building AEN) and Plot B (Building BE1/2/3), to support the creation of a genuine mixed community.
- 3.9 The proposed tenure mix is set out in Table 3.3 below.

Table 3.3 Proposed Tenure Mix

Tenure Type	Unit (no.)	Unit (%)	Affordable Split
Private	832	85.3%	-
Intermediate	40	4.1%	28%
Affordable rent	103	10.6%	72%
Total	975	100%	-

- 3.10 The proposed development has been designed to comply with London Housing Design standards and policy requirements for inclusive design. All buildings have been designed tenure blind.

Layout, Open Space and Public Realm

- 3.11 The proposal has been designed to maximise connectivity and publically accessible open space across the site. A new 1ha public neighbourhood park is proposed in Plot A, which will incorporate a series of key character areas which will each contribute to a unique sense of identity for the development and serve as a key public asset for existing and proposed residents. The landscape scheme will guide pedestrians through the development across a series of public, communal and semi-private areas which will deliver attractive routes through the site, connecting to the Thames River Walk.
- 3.12 The proposed development will also deliver significant new areas of public realm in Plot B, including a 3,620sqm landscaped area around the perimeter of the site, as well as a 1,444sqm podium garden for use by the public.

Access and Servicing

- 3.13 The development has been designed to be highly permeable in terms of access for pedestrians and cyclists. Routes are provided across the site, as well as two new pedestrian/cycle connections to Anchor and Hope Lane (in between Atlas and Derrick Gardens) and to the north connecting to the Thames Path.
- 3.14 The main vehicular entrance to the site will be from Anchor and Hope Lane. A raised table is proposed and a Zebra Crossing will also be provided at the northern end of Plot B. To improve pedestrian facilities, a Toucan crossing is proposed on Anchor and Hope Lane to the south of the Bugsby's Way roundabout.
- 3.15 All of the servicing and waste collection activities will take place within the site, away from the public highway. All servicing vehicles will access the site using the private access road off Anchor and Hope Lane and turning areas are provided within the development so that vehicles can enter and exit the public highway in forward gear. Shared surface design principles have been applied on the site where servicing routes are shared with pedestrian/cycle routes. Dedicated refuse storages will be provided within each plot and concierge services will be provided to manage deliveries for residents and to manage waste collections as necessary.
- 3.16 A total of 1,652 bicycle parking spaces are provided on site, exceeding London Plan standards. Residential cycle parking spaces will be provided at ground (below podium, Plot B) and basement (Plot A) levels in secure storage areas. Separate cycle parking will be provided within the overall storage areas for the use of staff of the commercial space. This will be located within the demise of each of these uses. Visitor cycle parking will be provided in the form of Sheffield stands at ground level in the public realm and will be able to provide for both commercial and residential visitors.

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- 3.17 The proposed development will provide a total of 198 car parking spaces. Car parking will be provided at basement level in Plot A accessed by a ramp at a gradient of 1:10; and at below podium level in Plot B. Blue Badge bays account for 59 of total spaces (30%), significantly exceeding the 10% minimum required by planning policy. As a minimum, 20% of all spaces will have electric vehicle charging points and a further 20% will have a passive provision as required by RBG and GLA.

Consultation

- 3.18 The Proposed Development has been subject to extensive and sustained pre-application consultation which has directly influenced the evolution of the proposal and the way it responds to its surrounds. The Applicant has sought feedback from Royal Borough of Green, CABE Design Council and the Greater London Authority. Public exhibitions for both local residents and members of the business community were held across several days in September and November 2016.
- 3.19 Full details of how the Applicant has engaged with the local community and comments that have helped shape the Proposed Development are set out in the submitted Statement of Community Involvement (SCI). The SCI demonstrates the wide reaching and comprehensive approach that the Applicant has taken to stakeholder consultation, which fully accords with and exceeds the requirements of the NPPF and the Council's Statement of Community Involvement.

Summary

- 3.20 As will be demonstrated by this Statement, the proposal is for a sustainable development that will provide a wide range of planning and regeneration benefits for the site and its surrounding area in accordance with national, regional and local planning policy. It will:
- Deliver sustainable development that contributes to the regeneration and economic, social and environmental well-being of the Charlton Riverside area;
 - Provide a development of high quality design that responds to the constraints of the site and its surrounding context;
 - Contribute to national, regional and local housing targets through the provision of a range of high quality homes, offering homes of different sizes and tenures, including affordable homes;
 - Provide new homes of an exemplary standard which comply with the Mayor's residential unit size standards and high quality amenity space and child play space;
 - Enhance connectivity through and across the site, providing new connections through to the river;

- Create a new 1ha neighbourhood park with areas for play, relaxation, and routes through to the river for use by all;
- Create new commercial floorspace that will activate key frontages and provide local facilities for existing and proposed residents;
- Deliver new jobs during the construction stage and within the completed development;
- Act as a catalyst for the redevelopment of the wider Charlton Riverside opportunity area, making a key contribution to the on-going improvement and regeneration of the area;
- Increase spending capacity through the introduction of new residents thereby contributing towards the economic well-being and vitality of nearby centres; and
- Contribute towards infrastructure requirements in the Borough, including the provision of education, health, open space, and transport improvements.

4. Planning Policy Framework

Adopted Planning Policy Framework

- 4.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 4.2 The adopted Development Plan for the application site comprises the London Plan (2016) and Royal Borough of Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
- 4.3 The proposal has also been considered with regard to other key documents, which will form material considerations in the determination of the planning application. These include the Government's National Planning Policy Framework (NPPF) (March 2012), the National Planning Practice Guidance website and various supporting policy documents, including but not limited to:
- GLA Housing Supplementary Planning Guidance (SPG) (2016);
 - GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012);
 - RBG Charlton Riverside Masterplan Supplementary Planning Document (SPD) (2012); and
 - RBG Planning Obligation SPD (2015).

National Planning Policy

- 4.4 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as 'a golden thread running through both plan-making and decision-taking' (para 14).
- 4.5 In assessing and determining development proposals, the NPPF states that local planning authorities should apply the presumption in favour of sustainable development (para 14). For decision-making this means approving development proposals that accord with the development plan without delay, or (where the development plan is absent, silent or out-of-date) granting permission unless:
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies (relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a

National Park; designated heritage assets; and locations at risk of flooding or coastal erosion indicate) indicate development should be restricted.

4.6 In accordance with the NPPF, local authorities are instructed to:

- boost significantly the supply of housing, and determine applications for housing in the context of the presumption in favour of sustainable development (para 47);
- promote a mix of uses in larger scale residential developments in order to provide opportunities to undertake day-to-day activities including work on site (para 38);
- encourage a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other services (para 37);
- encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value (para 17);
- place significant weight on the need to support economic growth through the planning system (para 19);
- seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area (para 187);

Emerging Planning Policy Framework

4.7 RBG is preparing a Site Allocations Local Plan document which will provide land use designations and specific policies for allocated sites in the Borough. The first round of consultation on the Issues and Options draft of the document ended in March 2016.

Site Specific Allocations/Designations

4.8 The application site is identified within the Charlton Riverside Opportunity Area by the London Plan. Opportunity Areas are designated by the London Plan as areas capable of accommodating substantial new jobs or homes. These areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density. Development potential in these areas should be maximised.

4.9 The Charlton Riverside Opportunity Area is identified in the London Plan for the provision of a minimum of 1,000 new jobs and 3,500 new homes between 2012 and 2027. Development here should be integrated with the wider development of the south bank of the Thames to complement similar opportunities at Deptford/ Greenwich, Greenwich Peninsula and Woolwich.

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- 4.10 Policy EA2 of the RBG Core Strategy allocates the Charlton Riverside (including the application site) as a Strategic Development Location. The policy sets out the vision for Charlton Riverside which includes:
- A new mixed-use urban quarter;
 - Consolidation of employment to maximise the use of land whilst maintain employment levels;
 - Reduction in the amount of out of town centre retail; and
 - Increases in both the quantity and quality of open space.
- 4.11 Supporting text states that the area will be transformed into an attractive and vibrant mixed use area including around 3,500 – 5,000 new homes.
- 4.12 The Charlton Riverside Masterplan (SPD)(2012) was prepared by Allies and Morrison to help guide development in the Charlton Riverside Opportunity Area. The SPD seeks to unlock Charlton’s development potential to help support the regeneration of the surrounding areas by offering new homes, including affordable housing, new /enhanced transport links and high quality open spaces. The SPDs key strategic objectives include (but are not limited to):
- Integrating Charlton Riverside with the existing Charlton community;
 - Transforming the image of Charlton and introducing a sustainable mix of uses in a high quality environment focussed around an enhanced and expanded Barrier Park;
 - Connecting into the transport network;
 - Creating a thriving new neighbourhood set within its landscape; and
 - Stitching together the retail and residential neighbourhoods within Charlton Riverside
- 4.13 The SPD envisages that the eastern portion of the masterplan area (including the application site) will become a mixed use quarter, with a mix of creative and cultural industries and introducing new residential uses.
- 4.14 The Council is currently in the process of preparing a new masterplan which will eventually replace the Charlton Riverside SPD. The revised masterplan has not yet been published for consultation. It is therefore at a very early stage of its development and should therefore be attributed little weight in the decision-making process. Notwithstanding, the applicant has sought to proactively engage with the Council to ensure that the proposed development is aligned with the wider objectives of the future masterplan. Further details on how the proposals are aligned within the masterplan vision are contained within the Design and Access Statement.
- 4.15 The proposals map also identifies the site in an ‘Area at Risk from Flooding’.
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4.16 A full assessment of adopted development plan policies, national planning guidance and other material considerations is set out in the following sections.

5. Site Suitability and Use

- 5.1 This section assesses the principle of redevelopment and suitability of the proposed commercial and residential use.

Demolition

- 5.2 The Application seeks comprehensive redevelopment of the Site, including the demolition of existing buildings and removal of hardstanding and associated infrastructure. None of the buildings are protected. There are no statutory or locally listed heritage features on Site. There are no national or local policies which restrict demolition in this instance. The Site is not in a Conservation Area. Demolition is therefore acceptable.

Loss of Existing Use

- 5.3 The existing buildings on site are currently in industrial use (Classes B2, B8, Sui Generis). The Core Strategy recognises that Charlton Riverside redevelopment of Charlton Riverside will see a reduction in employment land and changing employment use. Core Strategy Policy EA2 states that employment across the masterplan area will be consolidated to maximise the use of land whilst maintaining employment levels.
- 5.4 The application seeks consent for comprehensive redevelopment of the Site for alternative use, which will result in a net loss of employment floorspace on the application site. An Employment Study is submitted to support the application which justifies the loss of current employment space on the site and identifies both relocation space and new floorspace which is suitable for the type and nature of businesses that are seeking to locate (or are already locating) within the Charlton Riverside area.

Principle of Redevelopment

- 5.5 The NPPF includes a requirement to proactively drive and support sustainable economic development to deliver the homes, businesses and infrastructure and thriving places that the country needs; encourage the effective use of land by reusing land that has been previously developed (brownfield land); promote mixed use developments and encourage multiple benefits from the use of land in urban areas; and focus significant development in locations which are or can be made sustainable (Para. 17). The London Plan and RBG Core Strategy both identify Charlton Riverside for significant growth through large scale redevelopment and significant increases in homes.
- 5.6 The site is a brownfield site which has been identified for redevelopment at regional and local policy levels. The applicant is seeking to optimise the development potential of the

site in accordance with the objectives of the NPPF, the London Plan and local policy. The principle of redevelopment is therefore supported at all policy levels.

Proposed Land Uses

Residential

- 5.7 The Core Strategy recognises the need to optimise the use of land to deliver the national growth agenda and London Plan housing requirements. It also confirms that Charlton Riverside is one of the locations that will be the focus for new housing in the Borough (Policy H1). The Core Strategy identifies Charlton Riverside as a Strategic Development Location which has a Borough target for the provision of more than 3,500 net additional homes.
- 5.8 The London Plan states that Boroughs should seek to achieve and exceed the minimum annual average housing targets, augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply. Opportunity areas (such as Charlton Riverside) are expected to provide a significant increment to housing supply. The fact that the 'concept plan' included within the Charlton Masterplan SPD identifies the majority of the application site for residential use is significant.
- 5.9 The proposed development provides 975 residential units, supported by extensive public open space, ancillary leisure facilities for use by residents, including a gym, swimming pool and changing rooms. The delivery of new homes at the application site will make an important contribution towards helping the Borough achieve required housing targets, including on-site affordable housing.
- 5.10 The proposed development would provide a substantial contribution towards achieving both the Mayor of London and the Council's targets for the provision of new homes in the borough. As detailed further below in relation to the assessment of the proposed residential density, the development is considered appropriate and would serve to optimise the use of the site.
- 5.11 Accordingly, the provision of new homes as part of the proposed development of the site is considered to be in compliance and consistent with the relevant development plan policies at both the regional and local level, whilst helping to meet the Government's overarching aim of achieving sustainable development by providing new homes in appropriate locations. The principle of residential use is in accordance with the objectives of regional and local planning policy.
- 5.12 Matters in relation to the quality of residential accommodation and the provision of affordable housing provision are discussed further in this Statement below.

Office

- 5.13 The NPPF encourages a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other services (para 37).
- 5.14 The proposals include four office units totalling 1,560 sqm (GIA) of office (Class B1a) space to sustain employment generating uses on the site and help encourage active uses across the proposed development. The Employment Study submitted in support of the application confirms that the development proposals provide an opportunity for the borough to provide space to help meet new types of employment growth and property demands - in particular smaller office and other supporting uses. Discussions have also taken place with the Ethical Property Company, who has expressed an interest in working closely with the Applicant to ensure proposed space is occupied.

Flexible Retail/Café

- 5.15 Four individual flexible retail/restaurant units totalling 760 sqm (GIA) are proposed within the development in locations across the site to activate key frontages within the scheme and maximise their commercial potential. Two levels of accommodation will be provided within each, to allow for storage, back office functions or additional sales.
- 5.16 It is intended that this space will serve the needs of future occupiers of the proposed development and also meet the needs of those who live and work in close proximity to the site. Due to the relatively small scale of the proposed commercial units, the introduction of commercial floorspace is not expected to unacceptably impact on residential amenity, the environment, traffic patterns or road congestion. Flexible consent is sought for retail/restaurant/café use, a requirement to ensure that the units can respond to future demand.

Community Facilities

- 5.17 The proposals include two ground floor units proposed for community facilities. The intention is that these will accommodate a crèche and a healthcare facility respectively. The proposals will help serve the immediate local population, activate the public realm, and ensure a mix of uses is proposed on site to support the creation of a sustainable community.

6. Design

Layout

- 6.1 The NPPF outlines a number of core planning principles which includes the requirement to always seek to secure a high quality design and a good standard of amenity for all existing and future occupants of land and buildings (Para 17). Good design is identified as a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people (Para 56).
- 6.2 Policy 7.1 of the London Plan states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. Policy 7.2 further states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. The principles of inclusive design which seek to ensure that developments comply with London Plan Policy 7.2 have been addressed throughout the evolution of the development proposals for the Site.
- 6.3 Policy 7.4 of the London Plan goes on to state that developments should have regard to the form, function and structure of an area, including the scale, mass and orientation of surrounding buildings. The policy further states that buildings should provide contemporary architectural responses that:
- have regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass;
 - contribute to a positive relationship between the urban structure and local natural landscape features;
 - are human in scale;
 - allow existing buildings and structures that make a positive contribution to the character of a place to influence the existing character of the area; and
 - are informed by the surrounding historic environment.
- 6.4 Policy H5 of the Core Strategy states that new residential developments will be expected to achieve a high quality of housing design and an integrated environment. The Council will take into account the key relationships between the character of the area, site location and housing densities. Policy DH1 requires developments to be of a high quality design and to demonstrate that they positively contribute to the improvement of both the built and natural environments. To achieve a high quality of design, the policy sets out a number of expectations for development including:
- Provide a positive relationship between the proposed and existing urban context;
 - Promote local distinctiveness by providing a site-specific design solution;

- Demonstrate that the development contributes to a safe and secure environment for users and the public;
- Achieve accessible and inclusive environments for all, including disabled people;
- Create attractive, manageable well-functioning spaces within the site;
- Maximise energy conservation, through effective layout, orientation, use of appropriate materials, detailing and landscape design; and
- Enhance biodiversity and incorporate living roofs and/ or walls;

6.5 The Proposed Development has been the product of an extensive analysis of the Site and its surroundings undertaken by the design team to understand fully the context for the Proposed Development. A thorough assessment of the physical constraints and opportunities presented by the Site and its surroundings has been undertaken. Consideration has been given to the spatial framework and key design objectives of the Charlton Riverside Masterplan SPD (2012) and emerging replacement Charlton Riverside SPD.

6.6 The development has been carefully designed to respond to both the existing site context, as well as establish a high benchmark for future redevelopment sites within the masterplan area. The orientation of buildings is designed to create an open, active area for public use which will enhance north-south and east-west connectivity across the site, deliver new key public routes (including a new pedestrian route to the river) and a 1.6ha public plaza for public enjoyment.

6.7 The accompanying DAS demonstrates that the design of the Proposed Development has evolved in response to the site's context and on the basis of a series of underlying principles/objectives. The DAS (alongside the Statement of Community Involvement) also demonstrates how the Proposed Development has evolved through extensive consultation with the determining authorities, stakeholders, and the local community.

6.8 The Proposed Development has sought to make best use of the redevelopment opportunity that exists at this highly accessible, brownfield location. As such, the redevelopment opportunities that it presents have been optimised in accordance with the London Plan. The Proposed Development is the result of an extensive design process and is considered to be in compliance with the design principles set out in national, regional and local policy guidance.

Height

6.9 The NPPF considers that good design, which includes the design of taller buildings, is a key objective of delivering sustainable development. The NPPF also includes a requirement for local planning authorities to ensure that proposals optimise the potential of sites to accommodate development (Para. 58).

- 6.10 The Historic England Advice Note 4: Tall Buildings (2015), which updates previous guidance by English Heritage and CABE, produced in 2007, seeks to guide the design of tall buildings so that they may be delivered in a sustainable and successful way through the development management process. It recognises that in the right place, tall buildings can make a positive contribution to city life and states that all proposals for tall buildings should be accompanied by accurate and realistic representations of the appearance of the building.
- 6.11 London Plan Policy 7.7 acknowledges that Opportunity Areas may be appropriate locations for tall and large buildings. Likewise, Core Strategy Policy DH2 states that tall buildings may be appropriate in Charlton Riverside. Supporting text indicates that tall buildings will be supported in Charlton Riverside as long as the appropriate public transport infrastructure is delivered to support these and sufficient consideration is given to any existing historic assets and distinctive character features.
- 6.12 The proposed building heights have sought to optimise the development potential of the site for housing, whilst still meeting relevant technical design standards and ensuring the proposal does not have any significant negative impacts on adjacent dwellings or the development potential of adjacent masterplan sites.
- 6.13 Buildings are proposed across a range of heights, from 2 storeys to 28 storeys to allow individual buildings to respond to the detailed constraints and opportunities across the site. The Townscape, Visual and Heritage Impact Assessment submitted with the application includes a full assessment of the impact of the development on heritage assets and strategic and local views is provided in the Townscape, Heritage and Visual Impact Assessment. The Environmental Statement demonstrates that the Proposed Development is acceptable in terms of microclimate, water resources and flood risk and aviation.
- 6.14 On the basis of the above, it is considered that the Proposed Development complies with the relevant tall buildings policy tests. By optimising the use of the site to provide a development of this scale, it is possible to provide a number of important benefits. These benefits include the delivery of a significant amount of new housing to meet a pressing need, including a proportion of affordable housing to promote mixed and balanced communities, and provision of an exemplary 1.6ha new public park, new communal facilities (including a crèche and healthcare facility), all of which will be of benefit to the wider community, as well as future residents of the development.

Residential Standards

Dwelling Mix

- 6.15 The NPPF requires local planning authorities to deliver a wide choice of high quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand (Para. 50).
- 6.16 London Plan Policy 3.8 states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New developments are required to offer a range of housing choices in terms of the mix of housing sizes and types. The London Mayor's Housing SPG acknowledges that it is inappropriate to crudely apply 'housing mix requirements especially in relation to market housing, where unlike for social housing or intermediate provision, access to housing in terms of size of accommodation is in relation to ability to pay, rather than housing requirements'.
- 6.17 RBG Core Strategy Policy H2 reflects national and regional policy by requiring a mix of housing sizes on all sites providing new housing. RBG Core Strategy Policy H2 states that a mix of housing types and sizes will be expected in all developments and that the mix on each site will vary according to the location of the development and the character of the surrounding area. It adds that a proportion of the units should be 3, 4 and 4+ bedroom dwellings.
- 6.18 The proposed development will deliver 975 units, across a mix of studio, one, two, three and four bedroom units. The proposed housing mix is as follows:
- 1 bed 1 person: 168 units (17.2%)
 - 1 bed 2 person: 227 units (23.3%)
 - 2 bed: 306 units (31.4%)
 - 3 bed: 253 (25.9%)
 - 4 bed: 21 (2.2%)
- 6.19 The proposed mix has been developed with reference to the adopted policy targets, local demand and affordability. The proposals include a range of unit types and sizes that responds to the local circumstances and housing demand. By providing a high proportion of family sized accommodation, the proposed development will contribute significantly towards meeting strategic priorities to deliver new homes for families. The proposal is considered to be in accordance with planning policy, including Policy 3.8 of the London Plan and Core Strategy Policy H5.

Residential Quality

- 6.20 Planning policy at all levels places great importance on the need for new homes that are of high quality design, and highlights the role that this can play in creating successful communities. The London Plan is clear that the policy support for increasing housing supply should be delivered in tandem with quality.
- 6.21 London Plan Policy 3.5 states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The policy further states that Local Development Frameworks should incorporate minimum space standards that conform to those set out in the London Plan and the Housing SPG.
- 6.22 The London Plan and RBG Core Strategy include various development management policies relating to housing specification, including those relating to minimum floorspace standards, Wheelchair Units, and private amenity space. The Mayor's Housing SPG provides additional guidance.
- 6.23 The Proposed Development will create a high quality environment for future residents of the Site both within their homes as well as externally in the streets and landscaping. As explained in the DAS, there are a number of key attributes of the Proposed Development that help to achieve this:
- A network of public streets and spaces that are active and overlooked, giving rise to places that are safe to live in;
 - A well-balanced mixture of homes across the Site, including a high proportion of family homes;
 - A large proportion of houses and duplex apartments at ground floor and other units that provide front doors directly on to the streets and spaces;
 - No single aspect north facing homes;
 - Maximum active ground floor frontages;
 - Supporting facilities including community facilities, residential leisure facilities, retail/restaurant/café and workspace;
 - Private residential amenity space for each dwelling, including spacious gardens for family sized units;
 - A new 1ha neighbourhood park within Plot A, including a highly quality well-considered landscape plan which provides a variety of areas for public enjoyment, including child play space, gardens, water features and seating areas; and
 - Additional communal amenity space, including roof terraces.
- 6.24 The Proposed Development provides the highest residential quality by meeting policy requirements and in many cases meeting or exceeding the baseline and good practice
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standards within the London Plan Housing Design SPG. All units will exceed the minimum space standards in the Housing SPG and 10% will be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users (London Plan Policy 3.8, Core Strategy Policy H5). Table 6.2 summarises the residential quality considerations. A table detailing compliance with relevant London Plan Housing SPG is included within the DAS.

Table 6.2 Summary of Residential Quality Considerations

Criteria	Proposal/Commitment
London Housing SPG	<p>A principle adopted for the outline components to meet or exceed the 'Baseline' standards and 'Good Practice' standards.</p> <p>The majority of homes proposed as part of the detailed components meet the baseline and good practice standards, with minor exceptions which are strongly justified (see the DAS).</p> <p><u>All homes</u> in the detailed components meet the Mayor's minimum space standards.</p> <p><u>All units</u> in the detailed components meet the Mayor's minimum private amenity space standards.</p> <p>Refer to the DAS for a full appraisal against the SPG design guidelines.</p>
Wheelchair Units	10% of homes across the Site will be wheelchair accessible or adaptable to wheelchair standards.
Residential Amenity	The Proposed Development is designed to maximise privacy/minimise overlooking and meets acceptable standards in respect to daylight, noise and air quality.

- 6.25 For the reasons set out above the Proposed Development represents the highest residential quality and is in accordance with the policies in the London Plan and Housing SPG and RBG Core Strategy on high quality design.

Tenure

- 6.26 A key principle that has driven the selected housing mix is to provide a mix of housing types, sizes and tenures in order to contribute to the creation of mixed and balanced communities and broaden housing choice. In order to achieve this, the Proposed Development seeks to deliver the broadest possible range of housing types and tenures that assist in meeting the needs of a diverse population, including individuals, families and couples, and a wide range of income brackets.
- 6.27 Policy 3.11 of the London Plan states that affordable housing provision should be maximised subject to viability. It states that affordable housing should be split 60% social/ affordable rent and 40% intermediate rent or sale and that priority should be given to provision of affordable family housing. Policy 3.12 of the London Plan states that the 'maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes'.
- 6.28 At the local level, RBG has an overall strategic target of 35% of new homes to be provided as affordable, with the precise percentage, distribution and type determined by the

circumstances and character of the Site and development, including financial viability. Supporting text states that the preferred affordable housing mix is 70% affordable rented and 30% intermediate housing.

- 6.29 The proposals include 143 affordable dwellings, representing 15% of total provision on-site. A Viability Statement has been submitted in support of the application which confirms that this is the maximum viable quantum of affordable housing which can be supported on site. This is a significant material consideration in support of the application. The proposed affordable housing units are proposed in various locations across the application site, including both Plots A and Plot B. The proposed tenure split is 72% social rented and 28% intermediate, in compliance with the Council's housing objectives. A higher proportion of larger family sized units have been proposed in the affordable rent tenure, to reflect local demand.
- 6.30 The proposed tenure split will contribute towards key policy objectives for improving housing choice in London and RBG and will help support the creation of a genuinely mixed and balanced community. For these reasons, the proposed tenure mix is in accordance with national, regional and local planning policies.

Density

- 6.31 In relation to delivering new housing, the NPPF advises that local authorities should set out their own approach to housing density to reflect local circumstances (Para 47). It also outlines that planning policies and decisions should aim to ensure that developments optimise the potential of sites to accommodate development (Para 58).
- 6.32 Density ranges for new residential developments are set out in the London Plan and relate to the accessibility of sites (Table 3.2). Policy 3.4 of the London Plan states that development should optimise housing output for different locations within the relevant density range shown in Table 3.2. Proposals within Opportunity Areas should optimise residential output and densities and thus contribute towards meeting and where appropriate, exceeding the minimum guidelines for new housing (Policy 2.13). Core Strategy Policy H5 states that housing density levels should accord with the London Plan.
- 6.33 The Mayor of London's Housing SPG (2016) identifies that there is scope for higher density development beyond the matrix set out in the London Plan in particular circumstances. The SPG states 'it is essential when coming to a view on the appropriate density for a development, that proper weight is given to the range of relevant qualitative concerns' (Para. 1.3.9) and that 'conversely, greater weight should not be given to local context over location or public transport accessibility unless this can be clearly and robustly justified. It usually results in densities which do not reflect scope for more sustainable forms of development which take best advantage of good public transport accessibility in a particular location' (Para 1.3.10).

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- 6.34 Paragraph 1.3.50 of the Housing SPG acknowledges that 'meeting London's housing requirements will necessitate residential densities to be optimised in appropriate locations with good public transport access. The housing SPG specifically states that 'densities in opportunity areas and on other large sites may exceed the relevant density ranges in Table 3.2 of the London Plan'.
- 6.35 The Housing SPG states that schemes exceeding the density matrix should be of a high design quality and should be tested against a number of considerations, including:
- Local context and character, public transport capacity and the design principles set out in Chapter 7 of the London Plan;
 - The location of a site in relation to its existing and planned public transport connectivity (PTAL), social infrastructure provision and other local amenities and services;
 - The need for development to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and, in particular, accord with the housing quality standards set out in the SPG;
 - Overall contribution to local 'place making', including where appropriate the need for 'place shielding';
 - Depending on their particular characteristics, the potential for large sites to define their own setting and accommodate higher densities;
 - The residential mix and dwelling types proposed in a scheme, taking into account factors such as children's play space provision, school capacity and location;
 - The need for the appropriate management and design of refuse/ food waste/ recycling and cycle parking facilities; and
 - Whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (e.g. town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites).
- 6.36 Generally, development should maximise housing output while avoiding any of the adverse symptoms of overdevelopment, including:
- Inadequate access to sunlight and daylight for proposed or neighbouring homes;
 - Sub-standard dwellings (size and layouts);
 - Insufficient open space (private, communal and/ or publicly accessible);
 - Unacceptable housing mix;
 - Unacceptable sense of enclosure or loss of outlook for neighbouring occupiers;
 - Unacceptable increase in traffic generation;
 - Detrimental impacts on local social and physical infrastructure; and
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- Detrimental impacts on visual amenity, views or character of surrounding area.
- 6.37 The density of the proposed development will be 386 dwellings per hectare (1,121 habitable rooms per hectare). This is above the London Plan density guidance of between 45-260 units per hectare (200-700 hrh) for an Urban setting with PTAL Level of 4. Whilst this exceeds the London Plan matrix, in accordance with the London Plan London Housing SPG, there are considered to be exceptional circumstances that justify the level of density proposed, including the site's location within an opportunity area.
- 6.38 A design-led approach has been taken to the Site, underpinned by the objective of optimising its housing potential and having regard to the above considerations. The scheme has been rigorously tested to ensure that it does not result in any significantly adverse impacts with regards to townscape, environmental or infrastructural capacities. The results of this testing are set out within the Environmental Statement which accompanies the planning application submission and which is discussed elsewhere in this Statement.
- 6.39 The proposed development will make a significant contribution to local place-shaping as a result of its form, scale and density that enables creation of a significant quantum of new public open space to be provided. The new high quality public realm has been designed to be accessible to all, including the future occupiers and the existing community. The public realm will facilitate pedestrian and cycle connections across the site, including through to the river and unlock development sites to the east. The provision of new community facilities at ground level is also proposed.
- 6.40 In terms of residential design quality, the layout and form of the development means that the proposed dwellings will be of a very high level of amenity. The majority of the residential units within the scheme meet all applicable standards where residents of all tenures will enjoy exceptional design quality and living standards.
- 6.41 In terms of transport accessibility, the site benefits from a good transport accessibility rating of 4. With additional planned investment in local bus services and the potential for a new riverboat connection along the riverside, it is expected that accessibility to public transport will increase as the remainder of the masterplan area is developed.
- 6.42 Relevant design and impact considerations have been satisfactorily addressed by documents submitted in support of this Planning Application and demonstrate that the proposal does not exhibit symptoms of overdevelopment. The proposal is considered to be appropriately optimise the development potential of the site and make a significant contribution towards housing delivery (including on-site affordable) in accordance with the wider aims and objectives of the Charlton Riverside Opportunity Area and other policy requirements.
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Amenity Space and Open Space

- 6.43 The NPPF recognises that access to high quality open spaces can make an important contribution to the health and well-being of communities (Para 73).
- 6.44 London Plan Policy 3.5 seeks to enhance the quality of local places by ensuring that new housing developments take into account the provision of public, communal and open spaces. Policy 3.6 sets strategic guidance stating that the Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery. Policy 7.5 seeks to ensure that London's public spaces are secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces and the development proposals will accord with the objectives of this policy. The policy further states that development should make the public realm comprehensible at a human scale.
- 6.45 The application site is located within a District Park Deficiency Area according to the RBG Core Strategy. Policy OS(c) of the RBG Core Strategy states that the Council will seek to increase the provision of public open space and improve public access in areas of open space deficiency. New residential schemes of over 50 units in deficiency areas will be required to incorporate public open space provision.
- 6.46 The proposed development opens up the currently inaccessible and vacant site to provide a high quality and extensive public realm, with informal and formal play space, and open space. Public open space is provided in the form of a large landscaped public plaza at the centre of Plot A. The public plaza is zoned to appeal to different age groups and to provide a variety of environments including areas which emphasise and complement the building entrances, areas which are open and would allow lawn games, quiet seating areas and areas which provide defensible space to ensure privacy and security. The space will be zoned in terms of the planting used in order to break the area down into a range of smaller and visually distinctive spaces. The entirety of the ground floor will be accessible to the public, and incorporate areas of green open space, water features, seating, child play space and planting. The area will be activated by commercial and communal uses at the ground floor.
- 6.47 Plot B is supported by a 3,260sqm landscaped public space at ground level. This is in addition to a large 1,444 sqm landscaped garden at podium level will be provided for use by residents as well as the general public. Additional private and communal amenity space will be provided at terrace and roof level.

Child Play

- 6.48 Policy 3.6 of the London Plan requires development proposals that include housing to make provision for play and informal recreation based on the expected child population generated by the scheme and an assessment of future needs. It refers to the London Plan Play and Informal Recreation SPG for further guidance, which states that children's play space should be provided in new developments with a standard target of 10sq.m per child. The SPG further recommends the following accessibility requirements for children's play space:
- 400m walking distance from a residential unit for 5-11 year olds; and
 - 800m walking distance from a residential unit for 12+ year olds.
- 6.49 Policy H(e) of the Core Strategy states that the Borough where residential developments include over 50 units of family housing, suitably equipped and well-designed children's play areas are required for different age groups.
- 6.50 According to the GLA's child yield methodology there would be 110 children under five years living in the proposed development. Therefore the proposed development would create a demand for 1,100 sqm of under five years playspace based on the GLA's playspace requirement of 10sqm per child. In addition, the proposed development would generate 86 children aged 5-11 years old and 54 children aged 12-18 years old creating a demand for 860 sqm and 540 sqm of associated playspace respectively.
- 6.51 The application site will bring forward the following areas of playspace per age group:
- Under five year olds: 1,675 sqm;
 - 5-11 year olds: 1,314 sqm; and
 - Over 12 year olds: 877 sqm.
- 6.52 In total, the proposed development will deliver 3,866sqm of child play space, exceeding policy requirements for playspace by 1,366 sqm overall. Play space is provided across the scheme, within close proximity to building cores, away from vehicular routes and in sheltered areas of the scheme. The setting of proposed play space is located in areas that are appropriately overlooked so that it is safe and will be well used.

7. Transport and Accessibility

- 7.1 The application is submitted with a Transport Assessment (in accordance with the NPPF paragraph 32). It demonstrates that the Proposed Development will not result in any material impact on existing traffic flows to the site and sets out measures to improve access to the site by sustainable modes of transport.

Access

- 7.2 Vehicular access to the Site will take place from Anchor and Hope Lane using the existing access route to the site. This route will be upgraded to accommodate the proposed development, whilst also maintaining existing vehicular access points for adjacent industrial units. Pedestrian access will also be provided via this route, although it is also proposed to reinstate pedestrian access to the site from Anchor and Hope Lane between Derek and Atlas Gardens, in addition to providing access to the Thames Path from the northeast corner of the site.

Highways Capacity

- 7.3 The network has been assessed and the results of the local junction analysis have identified that the proposed development would not significantly impact the overall operation of the junctions assessed and the highway network will continue to operate within capacity.

Servicing

- 7.4 All servicing vehicles will access the site using the private access road off Anchor and Hope Lane. All of the servicing and waste collection activities will take place within the site, away from the public highway. Turning areas are provided within Plots A and B so that vehicles can enter and exit the public highway in forward gear. Refuse collection will take place in the basement of Plot A and at the southern end of Plot B. Concierge services will be provided to manage deliveries for residents. Details on the servicing and waste collection, including servicing routes and zones are set out in the Transport Assessment.
- 7.5 All servicing will be managed through a Servicing Management Plan (SMP) which will be secured by an appropriately worded condition for agreement with RBG prior to occupation.

Access by Non-Car modes

- 7.6 As explained in the TA, the Proposed Development will provide a new network of pedestrian/cycle routes that open up the site and provide a new connection to the Thames Path. New connections across the Site will enhance accessibility between local residential areas, and improve links to public transport services.

Car Parking

- 7.7 Policy 6.13 of the London Plan states the objective for promoting new development while preventing excessive car parking provision, and states that new development should accord with the London Plan car and cycle parking standards. Maximum car parking standards are set out in Table 6.2 of the Parking Addendum to the London Plan and are as follows:
- 1 – 2 beds: Less than 1 space per unit
 - 3 beds: 1.5 – 1 space per unit
 - 4 beds: 2 – 1.5 spaces per unit
- 7.8 The policy also outlines that developments must: ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles; parking for disabled people; meet the minimum cycle parking standards; and provide for the needs of businesses for delivery and servicing. It is also noted that in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people).
- 7.9 Provision for Blue Badge parking for disabled users at the outset (for workplaces) is set at one space for each employee who is a disabled motorist plus 5% of the total parking capacity for visitors. Blue Badge parking bays are required to be 2.4 metres wide by 4.8 metres long with a zone 1.2 metres wide provided between designated spaces and at the rear outside the traffic zone.
- 7.10 In total, 198 car parking spaces are proposed within the development. This equates to a provision of 0.20 spaces per unit. Provision at this level is below the maximum parking standards for residential use set out in regional and local policy. The proposed provision is considered to be suitable for the development, given the site's accessible location and the fact that the mix of homes proposed is such that a high proportion of these will be occupied by smaller households who are likely to be less reliant on private vehicles and who are more likely to be attracted to living at the site due to its close proximity and easy accessibility to a range of public transport alternatives. Of the 198 car parking spaces proposed, 59 (30%) will be sized for wheelchair users, above the level of provision required by planning policy.

7.11 In overall terms, the proposed residential parking provision is considered to be acceptable and accords with the adopted standards as set out at both regional and local level. The Transport Assessment provides further details of the proposed parking provision for the development.

Cycle Parking

7.12 Policy 6.9 seeks to facilitate an increase in cycling in London and requires that new development provides for the needs of cyclists. Provision should be made on the basis of 1 space per 1 or 2 bed and 2 spaces per 3 or more beds. Policy IM(c) of the RBG Core Strategy states that development must meet the London Plan standards for cycle parking at a minimum.

Land Use	Long-Stay		Short-Stay	
	London Plan	Proposal	London Plan	Proposal
Residential (Class C3)	1 space per studio and 1 bedroom unit 2 spaces per all other Dwellings	1556	1 space per 40 units	24
Retail (Class A1 non-food))	from a threshold of 100 sqm: first 1000 sqm: 1 space per 250 sqm thereafter: 1 space per 1000 sqm	2	from a threshold of 100 sqm: first 1000 sqm: 1 space per 125 sqm thereafter: 1 space per 1000 sqm	4
Retail (Class A3)	from a threshold of 100 sqm: 1 space per 175 sqm	2	from a threshold of 100 sqm: 1 space per 40 sqm	3
Community (Class D1-Health Care)	1 space per 5 staff	2	1 space per 3 staff	3
Community (Class D1-Creche)	1 space per 8 staff + 1 space per 8 students	12	1 space per 100 students	1
Community (Class D2 - Health Club)	1 space per 8 staff	2	1 space per 100 sqm	7
Office (Class B1a)	inner/ central London: 1 space per 90 sqm	22	first 5,000 sqm: 1 space per 500 sqm	4

7.13 The proposed development will include a minimum of 1,556 long stay residential spaces in the basement level, 42 long stay non-residential spaces within each unit and a minimum of 54 short stay spaces for all site users in line with London Plan Policy.

Travel Plan

- 7.14 The application is accompanied by a Draft Travel Plan Framework which sets out a number of suggested targets and measures to ensure that occupiers of the site are encouraged to use a range of sustainable forms of transport to travel to and from the site. Implementation of a Travel Plan will be secured by an appropriately worded condition for agreement with RBG before the development is occupied.

8. Environmental Considerations

- 8.1 The planning application is accompanied by an Environmental Statement (ES) that presents the findings of the assessments that were undertaken as part of the Environmental Impact Assessment (EIA). The ES includes a detailed assessment of the following matters:
- Cumulative Impact Assessment;
 - Site Preparation, Demolition and Construction;
 - Townscape and Landscape, Built Heritage and Visual Amenity
 - Socio-Economics;
 - Daylight, Sunlight, Overshadowing and Solar Glare;
 - Traffic and Transportation;
 - Air Quality;
 - Noise and Vibration;
 - Water resources;
 - Wind Microclimate; and
 - Waste.
- 8.2 The assessment of each topic is reported in the ES as a 'technical chapter'. Each technical chapter describes how the assessment in relation to that topic was undertaken, the current conditions on and adjacent to the Site and the potential effects of the development. Each technical chapter also describes a range of measures that would be incorporated to avoid, reduce, or offset any identified adverse effects, and/or enhance potential beneficial effects. Such measures are referred to as 'mitigation measures'. The resulting effects (known as 'residual effects'), following the implementation of the mitigation measures, are also described.
- 8.3 The ES also includes a Non-Technical Summary which provides a brief summary of each of the technical assessments that have been undertaken.
- 8.4 In overall terms, the ES concludes that the proposed development is appropriate in terms of local, regional and national policy and is considered to be of a design that addresses and responds to environmental considerations. The ES identifies that the proposed development will result in some short term adverse impacts during the construction phase, however, the benefits of redeveloping the site are considered to outweigh these.
- 8.5 Whilst the ES should be referred to for a full description of the proposed development's appropriateness in terms of the environmental impacts that might arise, we set out below further details of the potential impact of the proposed development on neighbouring residential amenity. Matters in relation to the living conditions of residents within the proposed development have already been discussed above.

Impact on Neighbouring Amenity

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- 8.6 London Plan Policy 7.6 requires that new development does not cause unacceptable harm to the amenity of surrounding land and buildings, in relation to privacy, overshadowing, wind and microclimate.
- 8.7 Policy DH(b) of the RBG core Strategy states that where determining applications for new development, the Council will only permit applications 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.
- 8.8 Core Strategy Policy E(a) states planning permission will be resisted where a proposed development would have a significant adverse effect on the amenities of adjacent occupiers or uses due to unacceptable emissions of noise.

Daylight/ Sunlight, Overshadowing and Glare

- 8.9 Daylight, sunlight and overshadowing assessments of the Development have been carried out in accordance with BRE Guidelines and the findings set out within the accompanying Daylight and Sunlight Report.
- 8.10 The development site currently comprises a number of warehouse and industrial units circa two to three storeys in height largely set away from the boundary with the residential properties on Derek and Atlas Gardens. Given the existing site conditions, any increase in massing and height across the site will therefore lead to a reduction in daylight and sunlight for existing residential development. An element of change will be experienced by residents directly adjacent to the site however this would be expected with any reasonable development scheme on site. Overall the impacts of the proposal on adjacent daylight/sunlight are not considered to be significant.
- 8.11 Construction of the development will have a gradually increasing effect on the levels of daylight, sunlight, overshadowing, and solar glare to the residential properties and amenity spaces on Derek and Atlas Gardens. Light pollution is likely to be negligible during site preparation and construction.
- 8.12 Along the western boundary of Plot A, the proposed building has been suitably set back in consideration of the existing residential properties on Derek and Atlas Gardens. This alignment minimises any loss of residential amenity as a result of loss of privacy and inadequate daylight/ sunlight.
- 8.13 The daylight and sunlight within the development has been maximised through the design process. Overall, the levels of daylight and sunlight within the rooms of the Development are acceptable for accommodation within an urban environment.

- 8.14 With regard to overshadowing, all existing amenity areas surrounding and within the development will retain direct sunlight for two hours or more, in excess of 50% of their areas. The impact of the development in this regard is therefore negligible.
- 8.15 The assessment of reflected solar glare has shown that there would be no instances of glare that would be significant.
- 8.16 In conclusion, the impact of the development in terms of daylight, sunlight, overshadowing, light pollution and solar glare is acceptable.

Noise and Disturbance

- 8.17 The Environmental Statement demonstrates that the proposed development will have a negligible impact on traffic and there will no significant increase in noise from this source. There will also be no significant adverse impact from the building services and plant following detailed design of these elements. The most adverse noise impact is likely to occur during the initial phase of construction. Careful selection of the methods and programming, acoustic screening and careful routing will be implemented to ensure minimal disruption.
- 8.18 An assessment of the noise and vibration effects of the proposed development is provided within the Environmental Statement. It is based on a number of site noise and vibration surveys, including for the residential uses. All fixed plant installations will be fitted with standard attenuation and acoustic screening, as required to meet the noise emissions limits. The Environmental Statement concludes that no additional mitigation is required beyond this and the site is suitable for its proposed use and complies with the relevant planning policy.

Energy and Sustainability

- 8.19 Paragraphs 93 to 97 of the NPPF underpin the Government's priority in delivering sustainable development. In line with the NPPF, development proposals are expected to comply with local requirements and should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and to increase the use and supply of renewable and low carbon energy.
- 8.20 London Plan Policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide (CO₂) emissions in accordance with the following energy hierarchy:
- Be Lean: use less energy;
 - Be Clean: supply energy efficiency; and
 - Be Green: use renewable energy.
- 8.21 Residential developments should target zero carbon from 2016 onwards. The priority is for reduction targets to be met on-site, however, where it can be demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a payment in lieu contribution.
- 8.22 The proposed development's energy strategy has been developed in accordance with the London Plan's Energy Hierarchy and demonstrates very high carbon performance. An Energy Strategy has been prepared and submitted in support of this planning application, demonstrating how the development complies with the specific requirements of the adopted development plan and therefore national and regional planning policy.
- 8.23 The potential for CO₂ emissions savings achievable by the proposed development have been maximised via incorporation of passive design and energy efficiency measures. 'Lean' measures incorporated within the detailed design include improved fabric efficiency including communal gas boilers. A natural gas CHP is also proposed, which would satisfy Part L and London Plan targets.
- 8.24 An analysis of the feasibility of on-site renewable energy technologies has also been undertaken. It concluded that although incorporating renewables would further reduce CO₂ emissions and reduce the electricity demand from the National Grid, they cannot be included due to design restrictions. An off-setting payment of approximately £23,400 per annum will be made to achieve zero carbon requirements.
- 8.25 It has been demonstrated that the site seeks to make the fullest contribution to minimising carbon dioxide emissions and incorporating sustainability measures and therefore accords with planning policy.

9. Relationship with Surrounding Masterplan

- 9.1 The NPPF is clear that while decision takers may give weight to emerging planning policies (such as the forthcoming revised Charlton Riverside Masterplan SPD), the amount of such weight will depend upon the stage of preparation of the emerging plan. The more advanced the preparation, the greater the weight that may be given. Importantly, that weight is tempered by any unresolved objections to relevant policies and the degree of consistency of the relevant policies in the plan to NPPF policies.
- 9.2 Whilst the NPPF is devoid of any further specific detail on the emerging policy issue, paragraph 14 of the PPG, states arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account (Reference ID: 21b-014-20140306). Such circumstances are likely to be limited to situations where both:
- The development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan; and
 - The emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
- 9.3 Having regard to the above, the Charlton Riverside Opportunity has been identified for significant housing growth by the London Plan since 2011, including a minimum of 3,500 homes. The RBG Core Strategy likewise designates the area as a Strategic Development Location for significant housing growth. Despite this supportive planning framework, no residential development has taken place. Within this context, the size of the proposed development is not so substantial, nor would its effects be so significant, that granting planning permission would have significant repercussions on the plan-led delivery of housing across the remainder of the Opportunity Area.
- 9.4 Notwithstanding the above, the architects have undertaken considerable work to re-interpret the key design principles of the Charlton Riverside Masterplan SPD (2012) to ensure that the proposed development aligns with key design principles and makes effective use of land. Full details of how the proposed development has been designed to establish a suitable street pattern and deliver the key design principles of the masterplan are included in the DAS.

10. Planning Obligations

CIL

- 10.1 The proposed development is liable to Mayoral CIL and RBG CIL. Mayoral CIL and RBG CIL have been calculated to be c. £2.4m and £4.4m respectively. The total CIL contributions for the site have been calculated as £6,757,170 (index linked).

Draft S106 Heads of Terms

- 10.2 The following Heads of Terms are expected for the Legal Agreement, however, these will be discussed in more detail and agreed with RBG Officers following submission of the application:
- Quantum and delivery of Affordable Housing on-site;
 - Mechanisms to undertake or fund hard/soft landscaping and highway improvements located on RBG and TfL land within the application boundary;
 - Employment training,
 - Monitoring, review, legal and professional fees.
- 10.3 In accordance with the guidance outlined in the Planning Obligations SPD (2015), it is anticipated that an appropriate package of Section 106 contributions, which will be subject to viability, will be discussed with officers following submission of the planning application. From 6 April 2015 the Community Infrastructure Levy Regulations prevents the use of obligations to 'pool' contributions for more than five developments, and therefore the S106 contributions will be determined on this basis.

11. Conclusions

- 11.1 This Planning Statement has been prepared in support of a full planning application made on behalf of Leopard Guernsey Anchor Propco Ltd, for the redevelopment of the site at Anchor and Hope Lane in the Charlton Riverside Opportunity Area.
- 11.2 This Statement has sought to demonstrate that the proposed development fully complies with the overall objectives of national, regional and local policy guidance, and in so doing, delivers a sustainable development of the site that will contribute significantly to the supply of homes in the Borough and London more generally.
- 11.3 The principle of development at the application site is supported by policy at a national, regional and local level. The development makes the best use of limited land supply and the principle of residential use is appropriate and supported by the sites location within a London Plan Opportunity Area and RBG Strategic Development Location.
- 11.4 The proposed development will deliver a significant number of new homes to meet a pressing need for new housing in a location that is allocated for strategic housing development and identified for very high growth in both regional and local planning policy. The proposed development will deliver a significant number of new dwellings (including affordable and family sized dwellings), to meet the ever increasing demand for new housing in a location that has been identified by the GLA as capable of supporting strategic housing development. The proposed residential unit mix accords with RBG planning policy, proposing a wide range of unit mix, including on-site affordable housing and a high proportion (28%) larger 3 and 4 bed units designed for families.
- 11.5 The proposal will also deliver a suitable scale of supportive uses, including community uses (envisioned for a crèche and healthcare facility), office floorspace, flexible retail/restaurant uses and residential leisure facilities including a gym and swimming pool. These uses have been designed to activate the public realm and help establish the creation of a new residential community.
- 11.6 The exceptional public realm will help foster a sense of placemaking, delivering a new 1ha neighbourhood park with a key series of areas designed for relaxing, playing and exercising. This will be complemented by extensive outdoor communal and private amenity areas for residents, including along podiums, terraces and at roof level.
- 11.7 The proposed development is the first to come forward within the masterplan area, providing an opportunity to optimise the use of this brownfield site to deliver a high quality residential-led mixed use development including significant new areas of exemplary public realm and landscaping scheme in accordance with the aims and objectives of the Charlton Riverside SPD. The development will set a precedent for high quality design whilst also acting as a catalyst for future development.
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- 11.8 The proposed development is considered to be in accordance with the development plan and other planning policy guidance and material considerations. As such, the Royal Borough of Greenwich should apply the presumption in favour of sustainable development and grant planning permission for the application being made.
- 11.9 The proposals will deliver the following key planning and regeneration benefits:
- A new residential led mixed-use development with landmark elements of the highest architectural quality;
 - Delivery of three tall buildings of exceptional design quality that will make an important contribution to and will enhance the overall legibility of the Masterplan area, whilst creating a landmark development to act as a gateway to the wider Charlton Riverside Opportunity Area, acting as a catalyst for future development;
 - The delivery of 975 new homes in a range of tenures, types and sizes to help address the demand for housing in RBG and London as a whole;
 - The provision of 143 affordable homes (15%) on-site to help promote a mixed and balanced community in the local area;
 - The delivery of high quality new homes of an exemplar standard which will exceed the minimum space standards, with no north-facing single aspect apartments; all the units will have access to their own private winter garden, communal amenity space and rooftop or podium level gardens;
 - Delivery of an exceptional new neighbourhood park for use by existing and future residents;
 - Enhanced legibility across the development site including the reinstatement of pedestrian accesses to the Thames Path and Anchor and Hope Lane;
 - New areas of play space, amenity and recreation;
 - Provision of flexible multi-purpose commercial and community units to provide services and facilities for both future residents and the wider local community;
 - The provision of CIL receipts, which will address the impacts that arise directly as a result of the development including for the provision of social, physical or community infrastructure, benefitting the wider area of Charlton and RBG.