

For the attention of : Helen Skinner

Charlton Together – Rule 6 Party – Statement to PINS

Case / Number : VIP Trading Estate / 3233585 (“Rockwell”)

Submission of the Statement from Charlton Together in respect of the above case.

Charlton Together is a collective of residents, amenity and community groups in Charlton SE7. It has been meeting for almost two years (since November 2017), this collective is made up of - Charlton Central Residents' Association (CCRA), Derrick & Atlas Residents' Association (DAGRA), SE7 Action Group, The Charlton Society, Valley Hill Hub, the Charlton Parkside Community Hub and St Luke's & St Thomas' Benefice.

In July of 2018 – the groups involved in Charlton Together opposed the (VIP Trading Estate) planning application heard in a public meeting at Woolwich Town Hall, before Greenwich Planning Board. On the night of the meeting, since many of the objections overlapped amongst the groups, we were given 20 minutes to co-ordinate our responses and present to the Planning Board.

In January of 2019 – similarly the local groups and Charlton Together made co-ordinated representations at City Hall (after The Mayor of London's "call-in"), again opposing the application.

Charlton Together also oppose this appeal.

Contained in this document

- List of Arguments
- Charlton Together Statements
- Documents to refer to

Please find below the list of arguments (objections), and statements by the groups and representatives within Charlton Together.

List of Arguments (to be put forward at the Inquiry)

1. Scale of deviation from the Charlton Riverside Masterplan SPD
2. Height, Density and Precedent
3. Sustainability, residential amenity, environment and air quality
4. Infrastructure
5. Sense of Place and Social Impact
6. Consultation Process – plus instruction to Rockwell by the Mayor of London

Statements

1. Scale of deviation from the Charlton Riverside Masterplan – SPD (David Gayther - Charlton Together)

The Charlton Riverside Masterplan – SPD was widely consulted on at a huge cost to the taxpayer approx. £854,000, and prepared by AECOM.

Many individuals and local groups were closely involved in the development of the Riverside masterplan, working with our local Councillors, and achieved quite a good compromise – one that met the competing demands of developers, local people, and employers. We reached a reasonable vision of a mixed use, medium rise, new Riverside community. The SPD actually allowed quite high densities in places.

It was a compromise, and the expectation was that it would be honoured – quite easily – by developers.

Sadly Rockwell has gone a long way in order to *bend the rules* of what was permissible. The proposals are wholly unreasonable, and out of scale in terms of density and height with every published vision there is for the area.

If allowed, this development will effectively nullify the local SPD which was agreed only recently in 2017 after five years of local consultation and major investment. As already argued, Rockwell's proposal goes far beyond the limits of what could reasonably be allowed against this SPD. But it is also worth noting a precedent has already been set.

Valley House, at 445 Woolwich Road, closer to Charlton Station than Rockwell – was approved in 2015. It is a 7 storey block with 74 dwellings. The developer originally asked for around 100 homes. But it was rejected by the Council. The developer appealed to the planning inspectorate where the Council's decision was upheld. We therefore consider a strong precedent – supported by the Government - has already been set, and which should rule out the heights and densities proposed by Rockwell.

Local groups were confounded when Greenwich Council officers wrote a report to its own planning committee recommending approval 'on balance' to 'kick start development'. Ignoring the huge variation in height and density against its own, recently approved SPD. It appeared they hadn't read their own SPD.

The proposal represented a deviation by a factor of almost double in density and height – yet the officers' report strained to make the '*on balance*' case in favour of the developer, despite all the evidence.

Whilst the developer made revisions to their application with some further improvements in places, they do not address our main concerns. Our main concern is centred around the sheer scale of deviation still proposed, against recently agreed local, and London planning targets. That concern has not been addressed, in our opinion, to any meaningful degree.

Over-development/non-compliance with Charlton Riverside SPD. This was the key reason Greenwich Council gave in rejecting the original proposal, and this remains our view. There has been no reduction in the number of homes proposed for the site (771 homes). In our opinion, the scale of deviation from density parameters set locally remains wholly unreasonable. We accept the need for flexibility regarding local interpretation of density limits. But here the deviation in density here is, by our calculation, well over twice these limits. This indicates that, at the Rockwell level of density, the site would take over 19,000 homes, rather than the 8,000 maximum proposed in the current London Plan, and 5,000 in the local SPD.

Charlton Together shared calculations with GLA planning officers, that show the SPD land usage with a conservative assumption that around 45% of the whole SPD site (around 56 Hectares) would be built on.

Rockwell's own analysis of density indicates 306 homes per Hectare. However this is based on a site area of 2.5 Hectares that includes 0.4 Hectares that could never be built on, mostly a narrow strip of land leading to the river, wide enough only for a road. It also includes rights of way, and land between Atlas and Derrick Gardens. The land for the whole of the two square plots of A and B is actually about 2.1 Hectares, which gives a density of about 367 homes per Hectare.

Either way, these densities are far higher than the Riverside SPD. The SPD guidance for Block A is 201-250 homes per hectare. The guidance for the land at Block B is 251-300 homes per Hectare. This all points to significant over-development – even taking Rockwell's figures at face value – which is well beyond any reasonable bounds of the SPD. Despite the movement in heights, Block A in particular remains significantly over-developed.

Conservation area - Derrick and Atlas Gardens, together with nearby land towards and along the river, were declared a conservation area in March 2018. This recognises not only the residential homes, but the riverside, and Anchor and Hope pub. It implies strongly that a far more sympathetic development is needed, more in line with existing designs and densities. Indeed this is precisely why we need the right precedent to be set at this site, given that it covers such important heritage assets.

In support of these concerns we quote the following - NPPF, London Plan (2010) Policies: 3.5, 7.1, 7.4, 7.5, 7.6, 7.7; Draft London Plan policies: D1, D4, D6, D7; RBG Core Strategy: H5, DH1, DH2 and the Charlton Riverside masterplan SPD – 2017.

2. Heights and Density, Precedent (Roden Richardson – The Charlton Society)

Almost all the buildings on both Plots A and B are 9-10 storeys high. The Masterplan calls for 3-6 storeys across Charlton Riverside; up to 10 storeys is deemed acceptable along the river's edge (and two developers are now working on proposals that take that approach). The Masterplan also suggests up to 10 storeys might also be acceptable in certain carefully selected locations as long as they do not compromise the "low- to mid-rise" aims for Riverside as a whole. One of these exceptions, it states, might suit the planned Neighbourhood Centre, the southern section of Anchor and Hope closest to Charlton Station. Rockwell takes advantage of this Masterplan suggestion to justify its proposal to spread 9-10 stories blocks across most of Plots A and B.

The excessive heights are one reason why public space between buildings will be canyon-like.

Rockwell's opportunism is setting a bad precedent. The acceptance by both Greenwich's and the GLA's planning officers of the Rockwell proposals seems to already have had the effect on plans being circulated by other developers now taking an interest in Charlton Riverside: they repeat the Rockwell approach and in one case even call for buildings higher than 10 storeys.

The Masterplan approach to height and massing is intended to respect local character as far as possible in the interests of making sure that Charlton Riverside and Hillside are seen to be and to work as a single place with its own character: Charlton. It is an approach that implicitly rejects the exploitative approach to building heights on the Greenwich Peninsula and in Woolwich Arsenal.

The densities proposed by Rockwell not only exceed by an unacceptable margin those set out in the Masterplan but, if allowed across the whole of Charlton Riverside, would result in doubling the approved number of homes in that area, i.e. up to 16000 rather than 8000 (the latter a figure that started life as 3500-5000, and then rose to 7500). 8000 homes is a number already putting pressure on infrastructure requirements (for which Greenwich Council, we have been told, has so far not developed any plans). In other words, developers coming to Charlton Riverside further over the coming months and years would have to accept far lower density figures if the 8000 limit is to be maintained, imposing a constraint that might deter them from investing, potentially leaving Riverside isolated and underdeveloped.

3. Environment, Sustainability, Air Quality, Amenity (Philip Connolly – Derrick and Atlas Gardens Residents Association)

It is worth noting that many of the environmental studies appear to still date from 2015 so for example the air pollution is divided by 975 and not the currently sought 775 dwellings. It is also important to illustrate that there have been occasions when the developers have listened to local concerns and that this gives us reason to believe that such major and pioneering development in an opportunity area could and should offer best practice in sustainable development. Instead there is at present no new offer of good practice in terms of environmental impact nor even better practice than that seen in the developments of a decade or more ago.

Over the last three years those who have heard our arguments have tended to agree with us. The developers have on three occasions upped the proportion of affordable social housing in the scheme and dropped plans for the 28-storey tower block. In March 2018 our neighbourhood became a conservation area. On July 9th, 2018 the planning board of Greenwich Council rejected the application unanimously. On the 29th of January 2019 the Mayor Sadiq Khan did likewise. Our residents' association have become a model of sensible moderation in planning; not against more housing but in favour of housing that respects our local distinctiveness as council planning policies require. We are not against a new neighbourhood of around 3000 new residents but want an integrated community for all. Not streets in the sky with more gyms and coffee shops but dwellings that relate to the public space and workshops where more people may gain training or a job. As Sadiq Khan himself told us after he had listened to us: "You are not nimbys."

At the public inquiry we wish to challenge the outdated thinking of the applicant with the modern vision of our residents.

Nowhere is the scheme more outdated in its thinking than in issues of sustainable development and that of air quality in particular. The environmental impact assessment falls into the trap of thinking that monitoring air quality constitutes action. It confuses mitigation measures with remediation whereas mitigation is almost always about reducing the impact of adding to the toxic load when on health grounds the existing pollution levels already need reducing. We will present evidence on the health impact of current pollution levels. It further over-simplifies the issue of significance.

There are pollutants that are

genotoxic and for which there is no safe level so consequently it is their presence or introduction that is significant and not their level. We will provide evidence on the consequences for our health and mortality of what is being proposed.

Finally, the assessments conducted in support of the scheme overlook pollutants such as PM2.5s for which the Mayor has set targets for reducing. We will provide evidence that the applicant has disregarded basic safeguards on our health.

With respect to sustainable development the scheme fails to offer innovation or even modern practice in response to issues of embedded energy, traffic generation or Carbon Dioxide emissions. When the millennium village or eco-village was built on the adjoining Greenwich peninsula the architect Ralph Erskine himself addressed public consultations to assure us that the development would be the best in energy efficiency. grey water recycling, soil decontamination, carbon footprint etc but we have not seen or heard any such virtues in the Rockwell scheme. It is small wonder that the Mayor

rejected their application partly on the grounds that it *was not sustainable development*.

There is an assumption that simply building on the site is an environmental improvement whereas the Rockwell scheme ought to drive up expectations and practice for the whole site of what constitutes environmental quality. We intend to present evidence on what is good practice and what is missing from the Rockwell scheme in terms of sustainability.

Finally, there is the issue of local amenity. The applicant has passed judgement on local amenity based on what they think is acceptable to us and not on what we think is acceptable. Consequently, they have deemed our loss of light *insignificant*, our exposure to noise *insignificant*, our loss of sunlit garden time insignificant and so on. Rockwell have admitted the effects but then written of the consequences. No where do they explain their test of *significance*. We will present evidence on the test of significance and demonstrate our resident's point of view on the significance of these factors to them. In summary we wish to help the planning inspector understand the full significance of their own decision.

4. Infrastructure **(Yann Le Clerq – Charlton Together)**

Road access

The 2017 Charlton Riverside SPD identifies network of roads to cross the site, to ensure permeability and access across the area. One of these roads runs parallel to the River Thames, providing an alternative to the primary east-west route, which the proposed scheme does incorporate. The applicant has failed to include the northern-most road within the proposals, or to provide an alternative means to access the site. This severely limits the permeability across the site and therefore limits the further development opportunities for neighbouring sites.

Open space provision

The 2017 Charlton Riverside SPD identifies an interconnected network of public open space running east-west across the masterplan area. The development proposal does not consider this strategic link, only referencing the north-south links to the River Thames. The failure to adequately provide open space provision negatively impacts the wider needs of the masterplan area.

Schools provision

The 2017 SPD identifies the need for three new schools across the Charlton Riverside masterplan area. An increase in population within the scheme will require additional spaces, although with the majority of homes being 1 or 2 bed, it is unlikely there will be large numbers of children. Despite this, the proportion of homes within the site largely exceed the demands across the site, and a much greater contribution is therefore required to develop schools from the scheme as it sets a density precedent for all other future schemes in the Charlton Riverside area.

Transport provision

The proposed development refers to access to Charlton Station as the primary transportation hub. While the transport assessment identifies that Charlton Station has adequate capacity to accommodate increased numbers from the

development, this is not put into the context of the higher than recommended density that the scheme proposes.

When taken against the overall capacity of the whole of the Charlton Riverside masterplan area, should every scheme be developed at this density range, a much greater provision of transport infrastructure will be required. In light of the precedent set by the scheme, it is therefore inadequate to rely on the existing transport provision without providing genuine solutions or funding for increased capacity that reflects that higher density than is currently recommended in the masterplan.

(Please see **Appendix A** – Charlton Together's own drawing based on a workshop discussion covering Infrastructure)

5. Sense of Place & Social Impact **(Rick Newman – St Luke's & St Thomas' Benefice)**

This developer appears to have a total disregard for the decisions of RBG and the Mayor in rejecting the original application, which paid no regard for present or future communities on Charlton Riverside. The application appears to have been an opportunist punt in the belief that Greenwich Planning Board was supine.

Rockwell's arrogance in failing to realise that RBG planners and the planning board are now reasserting the Masterplan, something that subsequent proposals from other developers at least have the grace to acknowledge. One of the grounds on which The Mayor rejected the Rockwell application was on the failures in consultation, a message Rockwell have evidently chosen to ignore in what feels like an act of planners petulance.

The benefice continues to press the need for *community development*, something that was rather overlooked in the Masterplan but which has been ignored by subsequent developers, who appear to be taking their cue from Rockwell. Charlton Riverside as a whole, requires a sense of place where consideration is given to the *day to day experience of people* who live there rather than simply sleep there.

6. Consultation Process – plus instruction to Rockwell by the Mayor of London **(Jodie Coughlan – Charlton Central Residents' Association)**

Since CCRA was founded in 2007, the association has been working hard across its own Planning Action Group with residents, Council and developers for open and honest, resident-to-developer engagement, and to ensure that planning application consultation exercises go thoroughly and wide enough to have *real value* to the evolving community, with a view to influencing good practice.

After Rockwell's first revised application was submitted in January of 2018, CCRA with other local groups, fought hard for a second public exhibition so that our community could have the chance to actually see what was then being proposed, we hoped to see a 3D model, to help us better understand the scheme, but there was no model at even that late stage.

On the 12th and 13th January 2019 after the Mayor's call-in, it was only then, the weekend before the day of the deadline (the 14th) that community actually got to see for the very first time - a 3D model of the further revised scheme. We find it shocking that in this day and age, models of the proposals were not produced at a much earlier stage.

The duration of this public exhibition, amounted to an unreasonable 4 hours, on a major development that will affect the Charlton community for considerable time to come, residents had many questions, but these were largely unanswered by those delivering the exhibition.

Despite the first community engagements in September of 2016, the developer has paid lip service to statutory requirements, giving local communities the impression that the consultation process is something that you "get round" rather than work through with local residents, taking this viewpoint you might say consultations are rendered meaningless.

Were it not for the efforts of groups within Charlton Together, residents would have the impression that all these things amount to a tick-box exercise, done deal. Some residents still do have this impression, voicing their concerns to me as a community representative - when going about their daily business, they stop to chat in the street, and they actually come and speak to me about their concerns, I would be happy to provide evidence of residents concerns (as expressed to me) for this inquiry.

The applicant has attempted to demonstrate on paper that they have consulted - with resident letters/leaflets, press and statutory notices, and held public exhibitions and in the end produced a model.

(the latter 2 things which we know there is no legal obligation to do), 2 things though, that the local communities really need to be able to understand and sadly had to really fight to get.

For something of this scale, a sensitive and intelligent approach should have been taken from the very beginning, rather than the absolute minimum. Residents are left feeling unsatisfied and asking the question of "why bother", this is something that will over time if left unchecked, will lead to an erosion of local democracy.

Finally, to add, the Mayor of London in his response letter dated 4 February 2019 (detailed in the list of documents herein) urges the developer to partner with the community, (whilst we understand the developer has the right to appeal) we expected that they would take this advice a high authority such as the Mayor.

Required - Listing of Documents to refer to

Letters / leaflets from Rockwell

Charlton Riverside SPD

London Plan

RBG Core Strategy

NPPF

Town & Country Planning Act (1990)

Letters of objection (groups within Charlton Together)

RBG Planning Officers Report

GLA Planning Officers Report

Valley House, Woolwich Road (planning application and appeal documents)

Charlton Together's own drawing (Appendix A)

Letter to local groups from the Mayor of London - Sadiq Khan (Feb 2019)

Prepared by J Coughlan for and on behalf of Charlton Together (19/09/2019)