



An **APLEONA** company

Report

65 Gresham Street
London
EC2V 7NQ

T: +44 (0)20 7911 2468
F: +44 (0)20 7911 2560

Planning Statement Addendum

Charlton Riverside

December 2017

Contents

1.	Introduction.....	3
2.	The Amended Proposals	4
3.	Planning Policy Framework	9
4.	Design	12
5.	Transport and Accessibility.....	22
6.	Environmental Considerations	25
7.	Transport, Social and Community Infrastructure	29
8.	Conclusion	31

1. Introduction

- 1.1 This Planning Statement Addendum is submitted in support of changes to Planning Application Reference 16/4008/F submitted December 2016, for the mixed use residential led redevelopment of VIP Industrial Estate and the VIP Trading Estate (the 'Application Site') in the Royal Borough of Greenwich ('RBG') (also known as 'Charlton Riverside'). This Statement should be read in conjunction with the Planning Statement that was submitted as part of the original application Reference 16/4008/F.
- 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 revised scheme will deliver a high-quality mixed use development including 771 new homes across a mixture of tenures (including on-site affordable), high quality public open spaces, residential gardens, and supporting commercial and community facilities, referred to in this Statement as the 'Proposed Development'.
- 1.3 The application is the culmination of extensive consultation undertaken with the Greater London Authority (GLA), RBG, other statutory stakeholders and local residents and businesses, the details of which are set out within the Statement of Community Involvement submitted as part of the original scheme. Since the original submission there has been a great deal of additional consultation feedback which has helped to shape the Proposed Development, this is discussed in section 2.
- 1.4 This statement sets out the planning case in support of the revised proposals in the context of relevant national, regional and local planning policy and guidance.

2. The Amended Proposals

2.1 The development proposals will deliver a sustainable residential-led development supported by complementary uses. It will provide high quality public realm and open space, significantly enhance permeability and connectivity, and will act as a benchmark and catalyst for future development within the wider Charlton Riverside area. The proposals include:

- 771 residential units provided within 11 buildings ranging in height from 2 to 10 storeys, with access to private gardens and roof terraces;
- 3,236 sqm (GIA) of flexible office, retail, community and leisure space in Plot B;
- 833 sqm (GIA) of flexible community, leisure uses and ancillary residential facilities in Plot A;
- Extensive external public realm improvements and landscaping; and
- Associated car parking, cycle parking, plant and refuse areas.

2.2 The Proposed Development is a revision of the submitted scheme which seeks to respond in a positive manner to the Charlton Riverside SPD (2017), which was adopted following the original submission in December 2016. The Proposed Development retains the key design principles of the original scheme. The revisions are focused around lowering building heights and reducing density across the scheme following feedback from RBG officers and other key stakeholders.

2.3 The proposed Description of Development as follows:

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

2.4 A key of the proposed buildings is shown in Figure 1 below.

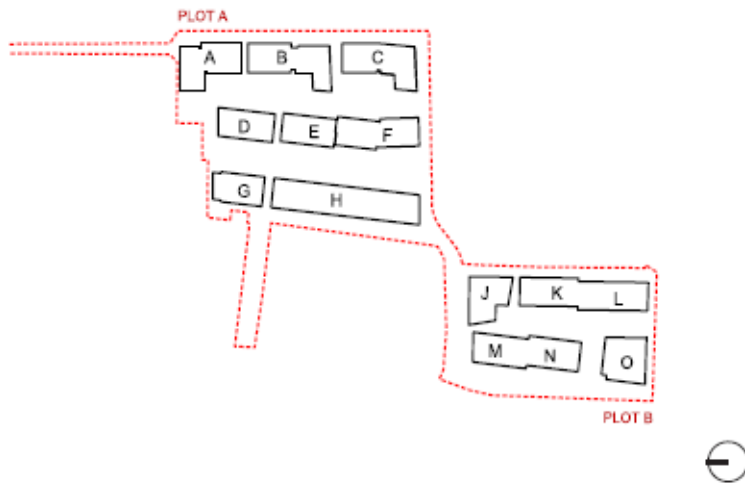


Figure 1 Proposed Building Key

Land Use

- 2.5 The proposed land uses have not changed since the original submission and remains a residential-led scheme with supporting employment, retail, community and leisure facilities. The quantum of non-residential floorspace has been increased from 3,521 sqm to 4,119 sqm GIA.
- 2.6 In order to maximise flexibility in the take-up of non-residential floorspace, a flexible use class has been applied to the in both Plot A and Plot B. The applicant expects that the majority of the floorspace will be occupied as B1 workspace and would be agreeable to a condition which required a commitment to a minimum amount.

Residential Accommodation

- 2.7 The proposal will deliver 771 new, high quality homes across a range and mix of unit types and sizes. This equates to a reduction of 204 homes from the originally submitted scheme. The revised housing mix is set out in Table 2.

Unit Type	Total Units	Total Hab rooms
1 bed 1 person	147 (19.1%)	294 (14.0%)
1 bed 2 person	193 (25.0%)	386 (18.3%)
2 bed	305 (39.6%)	915 (43.5%)
3 bed	121 (15.7%)	484 (23.0%)
4 bed	5 (0.6%)	25 (1.2%)
Total	771	2104

Table 2 Revised Housing Mix

- 2.8 The amended proposals have been designed to accommodate 166 affordable homes (equating to 21.5% based on units and 25.3% based on habitable rooms) for the purposes of assessing this revised scheme. This represents an increase of 23 affordable homes from the originally submitted scheme.
- 2.9 It is noted that this is a higher quantum of affordable housing than the viable amount identified by the accompanying Viability Assessment Addendum. This described quantum and mix of units is therefore indicative and could change subject to further discussions with RBG and the GLA. Affordable units will be located in both Plot A (in Buildings B and C) and Plot B (Building L) to support the creation of a genuinely mixed community.
- 2.10 The indicative tenure mix is set out in Table 3 below:

Tenure	Units	Affordable Split
Intermediate	64	30%
Affordable Rent	102	70%

Table 3 Indicative Tenure Mix

- 2.11 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

- 2.12 The landscape proposals have been revised from the originally submitted application in response to consultation feedback and the revised layout, form and scale of buildings. Exterior Architecture are the new landscape architects that have been appointed to re-design the landscape and open space proposals.
- 2.13 The key landscape principles of the originally submitted scheme have been retained with new routes created to allow both north-south and east-west pedestrian connections through the site and opportunities for future permeability to other areas of the masterplan. The scheme has retained the principle of creating generous areas of public realm and communal roof gardens for the residents to enjoy and children to play within both Plot A and Plot B. The buildings continue to be orientated on a north-south axis to maximise the amount of sunlight received by the public realm and green spaces.
- 2.14 The most significant change in the proposals is the removal of the single large area of open space in Plot A and the creation of smaller, more intimate spaces with distinctive characters and functions to better serve future occupiers needs. This is a direct response to the

comments made by the CABE Design Review Panel about the how the public realm could be improved to serve the future residents of the development.

- 2.15 The revised landscape proposals are explained in detail within Chapter 10 of the accompanying revised Design and Access Statement.

Access and Servicing

- 2.16 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.
- 2.17 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.
- 2.18 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.
- 2.19 The Proposed Development will include a minimum of 1,203 long stay residential spaces, 47 non-residential long stay spaces and a minimum of 73 short stay spaces for all site users
- 2.20 The proposed development will provide a total of 210 car spaces. This includes a total of 51 accessible bays and equates to 24% of the overall parking provision.

Consultation

- 2.21 Since the submission of the original planning application ref. 16/4008/F in December 2016, the applicant has undergone various stages of consultation with the Council, the GLA and other key stakeholders. The adoption of the Charlton Riverside SPD (2017) and its implications on the acceptability of the proposals has been a key to this consultation. Following a meeting held on 9th March 2017, the Council provided a written response to the original submission on 10th

May 2017. The response provided a planning policy assessment of the current planning application and the draft revisions dated 3rd March 2017.

- 2.22 The letter concluded that the proposals are not considered to be acceptable in respect of *'the key aspects of affordable housing, employment, heights, density and conflict with SIL and the Safeguarded Wharves'*.
- 2.23 Since this time, our client has worked collaboratively with the Council, the GLA and other key stakeholders to produce revised proposals that would seek to address these concerns.

Summary

- 2.24 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 and the Thames Path;
 - Create a range of new open spaces to serve the future residents needs, with areas for play, relaxation, and routes through to the river for use by all;
 - Create new commercial floorspace in Plot B that can both retain existing businesses and attract new businesses that will provide a significant uplift in the number of jobs;
 - Create new community spaces that can 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.

3. Planning Policy Framework

- 3.1 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.
- 3.2 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).
- 3.3 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 supplementary policy documents.
- 3.4 The Development Plan for RBG has not changed since the submission of the original application in December 2016. However, there are a number of other key documents that have been adopted which will form material considerations in the determination of the planning application. Of particular relevance to the Proposed Development is the Charlton Riverside SPD (2017), which is discussed in further detail below. The GLA has also adopted the following planning guidance since the submission of the original application which are of relevance to these proposals:
- Culture and Night-Time Economy SPG (November 2017)
 - Affordable Housing & Viability SPG (August 2017)

Emerging Planning Policy Framework

- 3.5 In February 2016, RBG published the Issues and Options Version of its Site Allocations Development Plan Document (DPD) for consultation. We understand that RGB's Preferred Approach to Sites Version was due to be released for further public comment in Autumn 2016, with submission to the Secretary of State in Spring 2017 and adoption by Winter 2017. However, this programme has been delayed and we understand that the Preferred Approach to Sites Version of this DPD will be released in Spring 2018.

Draft London Plan 2017

- 3.6 The consultation on the new draft London Plan started on 1st December 2017 and runs until March 2018. The new London Plan will cover the period from 2019 to 2041, providing a longer-term view of London's development to inform decision making.

- 3.7 This planning statement does not include any assessment of the revised proposals against the draft London Plan policies as it is anticipated that the Proposed Development will be determined prior to the conclusion of the first round of consultation.

Site Specific Allocations/Designations

- 3.8 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.
- 3.9 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.
- 3.10 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.
- 3.11 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.
- 3.12 The proposals map also identifies the site in an 'Area at Risk from Flooding'.

Charlton Riverside SPD 2017

- 3.13 Since the submission of the original planning application ref 16/4008/F, the Council has adopted the Charlton Riverside SPD (2017). The SPD replaces Charlton Riverside Masterplan (SPD)(2012) and provides updated guidance for the sustainable regeneration and redevelopment of the Charlton Riverside site with a greater level of direction on development than that provided by the 2012 SPD.
- 3.14 The SPD introduces a number of detailed policies and design guidance in relation to the site and includes a Vision for Charlton Riverside:

'Charlton Riverside - a living, working neighbourhood Charlton Riverside is a significant employment site in the Royal Borough of Greenwich. Its rich industrial heritage will shape a series of new neighbourhoods, integrating residential development with modern industrial, office and creative employment opportunities. Incoming residential development will be characterised by medium-rise housing and family homes. A network of streets and open spaces will reflect the historical pattern of paths and boundaries, creating a healthy environment that encourages walking over using a car, where children can play outside and residents and visitors can enjoy a varied and attractive selection of leisure, recreation and social activities. Development will be supported by new schools and facilities. Improvements to Charlton Station and Woolwich Road will help to integrate new development with the rest of Charlton.'

3.15 The vision is underpinned by the following principles:

- An additional 4,400 jobs (over and above existing employment);
- Integration of employment uses into new development;
- An additional 5,000 - 7,500 homes (based on a more detailed assessment of the site's capacity);
- 50% family housing and 35% affordable housing;
- Low to medium rise development (3-6 storeys);
- Transport networks that reflect historic routes;
- In future years, in the SIL area, subject to appropriate relocation, de-designation and new transport infrastructure being provided, some taller buildings may be permitted to transition into the Millennium Village and Peninsula;
- Respect for heritage assets; and
- Creative design response to the need for flood protection.

3.16 A full assessment of adopted development plan policies, national planning guidance and other material considerations is set out in the following sections.

4. Design

- 4.1 The relevant local, regional and national planning policies are set out within the original Planning Statement dated December 2016, submitted as part of the original application. Since this time, the Council has adopted the Charlton Riverside SPD (2017).
- 4.2 Section 9 of the Charlton Riverside SPD (2017) sets out the Council's vision for a well-designed Charlton Riverside. The section introduces a number of design principles, including the location of centres and hubs and the introduction of residential perimeter blocks with buildings aligned parallel to the street, resulting in a high degree of continuity of frontage and enclosure of the street.
- 4.3 The revised scheme has been carefully designed to respond consultation responses from RBG and the GLA, and to respond to the design principles in the Charlton Riverside SPD.

Layout

- 4.4 The general layout of the originally submitted scheme was broadly supported by the GLA and CABE, subject to addressing a number of detailed points. However, the comments provided by RBG following the adoption of the revised SPD suggested that the layout and typologies of some of the buildings in Plot A did not align with the aspirations of newly defined 'Charlton Garden City' character area. RBG stated that the urban form should be organised in terraced apartments or perimeter blocks with direct access to streets and 'back-to-back' gardens and continuous building line defining public realm, as intended by the SPD document.
- 4.5 A key alteration to the original scheme in response to consultation feedback is the removal of the taller podium buildings within the centre of Plot A and reconfiguring the blocks on the eastern boundary of the site to adopt a more traditional layout of linear buildings fronting streets and spaces with each façade treated as a primary elevation ensuring it has an outward looking face that makes a contribution to the street scene. A courtyard perimeter block approach was discounted on Plot A as it was considered that this would result in poorer quality green spaces that would have restricted levels of sunlight and would lead to the creation of north-facing single aspect units.
- 4.6 In Plot B, the proposed layout is similar to the originally submitted scheme, retaining the courtyard perimeter block approach supported by the SPD and the creation of a more distinctive gateway building at the south-western corner of the site. A new area of public realm is proposed that will form a plaza to serve the new commercial hub in response the masterplan aspirations to create a new Neighbourhood Centre in this location. The layout of the buildings has been improved, to ensure that the northern aspects of the buildings are

afforded sufficient outlook and daylight. Furthermore, the buildings have been re-sited away from the site boundary lines to create comfortable separation distances between the proposed buildings and the neighbouring sites.

- 4.7 As part of the design process involved with the revised layout, any issues regarding privacy that may have occurred due to block separation have been mitigated through the revision of internal layouts. This has ensured that there are no overlooking issues and that a sense of privacy is maintained.
- 4.8 In summary, it is considered that the layout of scheme has been revised to align more closely with design aspirations of the adopted Charlton Riverside SPD, as well as responding in a positive manner to the various forms of feedback which has been received since the planning application was originally submitted.

Height

- 4.9 Reducing the overall height of the development has been a major driver in considering the proposed amendments to the application. This is to ensure that the proposals respond more appropriately to the guidance Charlton Riverside SPD (2017).
- 4.10 The SPD states that typically, building heights will vary between 3 and 6 storeys (although there is scope of buildings up to 10 storeys in certain locations), with the detailed consideration at design proposal and planning stages to ascertain what is appropriate for a specific location. The SPD includes a diagram at Figure 6.2 which provides guidance on 'typical maximum heights', to inform design thinking, which is included below in figure 2.

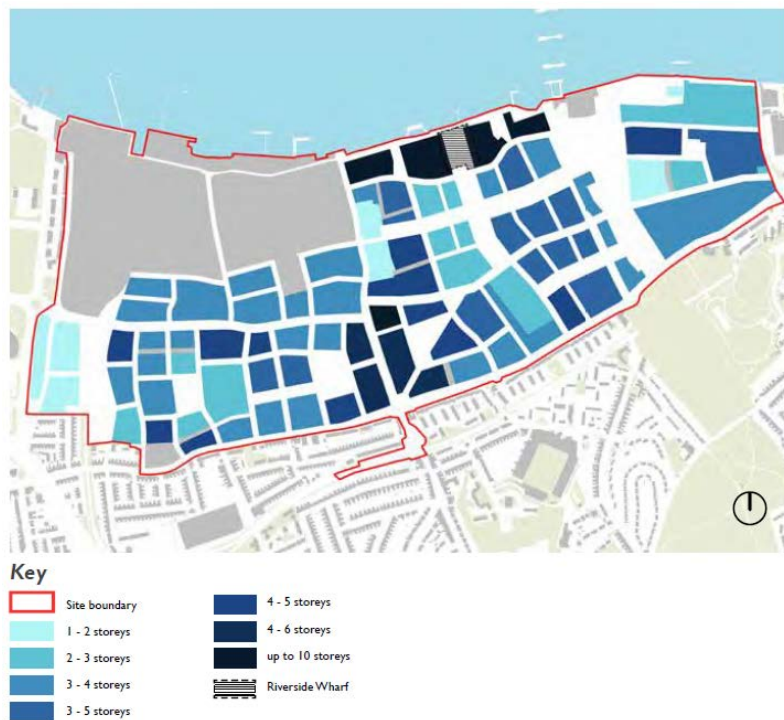


Figure 2 Typical Maximum Building Heights

4.11 The SPD has been a key consideration in the design of the revised scheme. The original submission included proposed building heights ranging between 2 - 28 storeys. This has been significantly altered to bring the revised proposals to be more in line with the SPD, with the revised proposals seeking approval for buildings ranging between 2 - 10 storeys.

4.12 The building heights within Plot A have been reduced with a particular focus on increasing privacy and reducing overlooking on the residents of Atlas and Derrick Gardens. It is acknowledged that there are buildings in Plot A which exceed the typical maximum of 4 – 6 storeys, however, the guidance states that:

There will be locations where some taller buildings might be considered appropriate, such as the neighbourhood core focused on the lower section of Anchor and Hope Lane, between the junctions with Bugsby's Way in the north and Woolwich Road in the south. Proximity to the station, with a higher PTAL and the opportunity to mix commercial, leisure and other non-residential uses with housing means that relatively tall buildings could be considered in this location, but always in the context of a prevailing model of development that is low-to-medium rise, high density.

4.13 In this case, the site is located in a well connected area of the masterplan in close proximity to the Charlton Railway Station and therefore achieves a good public transport accessibility rating of 4. This suggests that there is an opportunity to optimise density provided that it responds to its surrounding context and the greater scale of development does not cause any

adverse townscape or amenity impacts. Being one of the first developments in the masterplan area to come forward for residential development, there is both an existing and future context to consider in setting an appropriate scale of the development.

- 4.14 The proposed buildings on Plot A predominantly step up in height from the western boundary towards the eastern perimeter. The buildings are articulated and vary in scale along their north - south axis from 4 to 10 storeys. The tallest buildings are sited away from the existing residential properties to ensure that they would not be visible from their rear gardens.
- 4.15 The linear terraced block sited along the western boundary (Blocks G – H) varies in scale from 2 – 5 storeys with a recessed sixth storey. This stepping of the form and the minimum distance of 20 metres is considered to create an acceptable physical relationship with the existing 2 storey residential properties at Derrick and Atlas Gardens. The stepped form of the buildings will maximise daylight and sunlight to the rear gardens and elevations of these properties. The outlook from the rear of these properties will also be significantly improved in comparison to the existing view which is dominated by large vehicles and industrial sheds that occupy the site.
- 4.16 This block has been sensitively designed in response to the existing context and has not altered from the original submission. The formal comments received from RBG suggest that these blocks are considered to adhere to the expected design and massing for the 'Charlton Garden City' character area. The GLA also supported the design approach of this block and stated that:
- 'With regards to the proposed height and massing, the stepping down of the building heights towards Atlas & Derrick Gardens is supported and in particular the proposed townhouse block creates a sympathetic relationship that helps to mediate between the existing, traditional low-rise residential buildings and the proposed larger scale modern development towards on Plot A'.*
- 4.17 These design principles have resulted in a revised scheme that integrates well with the existing residential uses and does not adversely impact upon neighbouring amenity. It is considered that the approach of optimising the scale of the buildings in Plot A to a height that exceeds the general guidance in the SPD is justified and also helps deliver a higher density of development that is envisaged by the SPD for this particular area of the masterplan.
- 4.18 The scale of the buildings within Plot B have been significantly altered since the original submission, with the notable omission of the 28 storey tower. In place of the tower, a free standing 10 storey 'gateway' building has been introduced towards the south eastern corner of the site, which will continue to act as an entrance to the site and responds to its location at the heart of the designated Neighbourhood Centre and the proximity of the train station.

- 4.19 The buildings towards the north eastern boundary have been designed to step down in height towards the existing residential properties, which forms a seamless transition between plot A and B, helping to link the plots together and create one cohesive development.
- 4.20 As such, it is considered that the revised significantly proposals improve upon the original submission and have the potential to act as a tool to unlock future development within the surrounding sites and across the wider masterplan area.

Residential Standards

Dwelling Mix

- 4.21 The Charlton Riverside SPD (2017) states that RBG is committed to a minimum of 50% of units built being provided for family housing in the masterplan area which is evidenced by Policy H2 of the Core Strategy.
- 4.22 The SPD anticipates development to provide a range of housing types and tenures, including a significant proportion of family housing, to ensure that local residents have the opportunity to be part of the new development.
- 4.23 The SPD states that family dwellings might be individual houses (typically town houses over three floors), maisonettes or duplexes and larger apartments and that these might be delivered in combination, with groupings of town houses or maisonettes with apartments above.
- 4.24 The proposed development will deliver 771 units, across a mix of studio, one, two, three and four bedroom units in a variety of typologies that reflect the aspirations of the SPD, including townhouses and duplexes that ground the development in a traditional way. The proposed housing mix is as follows:
- 1 bed 1 person: 138 units
 - 1 bed 2 person: 201 units
 - 2 bed: 302
 - 3 bed: 126
 - 4 bed: 3
- 4.25 The proposed mix equates to 24.65% provision of family housing when calculated on the basis of habitable rooms. Charlton Riverside SPD (2017) seeks to achieve 50% family housing; however, it is noted this is not a requirement under Core Strategy policy H2. This proposed mix has been developed with reference to the adopted policy targets, local demand and viability.

- 4.26 The applicant has worked hard to maximise the quantum of family sized units and the final mix should be considered in respect of scheme viability and the ability to maximise the quantum of affordable housing. The delivery of a higher number of smaller units which can still serve the needs of families will also be more affordable to local people when considering current and projected sales values and rents. We understand that the new target is masterplan wide, rather than this being treated as a fixed minimum which would be applied on a site by site basis.
- 4.27 As such, the proposal is considered to be in accordance with planning policy, including Policy 3.8 of the London Plan and Core Strategy Policy H2.

Tenure

- 4.28 The Charlton Riverside SPD (2017) echoes the Core Strategy in terms of the affordable housing requirement. The SPD states that RBG requires 35% affordable housing, with the actual quantum, type and mix to be addressed on a phase-by-phase or parcel-by-parcel basis, as appropriate, and subject to the test of viability (the Royal Borough sets out its requirements in terms of viability assessments in its Planning Obligations SPD, 2016 and the Local Information Requirement List for Planning Applications, 2016). The SPD goes on to state that affordable housing should be split as follows: 70% affordable rent and 30% intermediate tenure.
- 4.29 The revised proposals have been designed to accommodate 166 affordable dwellings representing 25.3% provision on the basis of habitable rooms. The approach to calculating affordable housing on a habitable room basis is informed by the Affordable Housing and Viability SPG (August 2017).
- 4.30 This total would represent an increase of 23 affordable homes from the originally submitted scheme in response to previous consultation feedback. The proposed tenure split will be 70% social rented and 30% intermediate, in compliance with the Council's housing objectives.
- 4.31 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.
- 4.32 This is a significantly higher quantum of affordable housing than the 8% by unit which has been tested as being the maximum viable amount, as demonstrated by the accompanying viability assessment addendum. This described quantum and mix of units is indicative and could change subject to further discussions with RBG and the GLA.

Density

- 4.33 As set out within the Planning Statement dated December 2016 submitted as part of the original application, density ranges for new residential developments are set out in the London Plan and relate to the accessibility of sites (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.
- 4.34 The Charlton Riverside SPD (2017) aims to achieve high density development at a human scale, creating a strong sense of place. The SPD provides indicative expected density figures for the masterplan area on Figure 6.4 (Development Densities). This is included below in Figure 3.

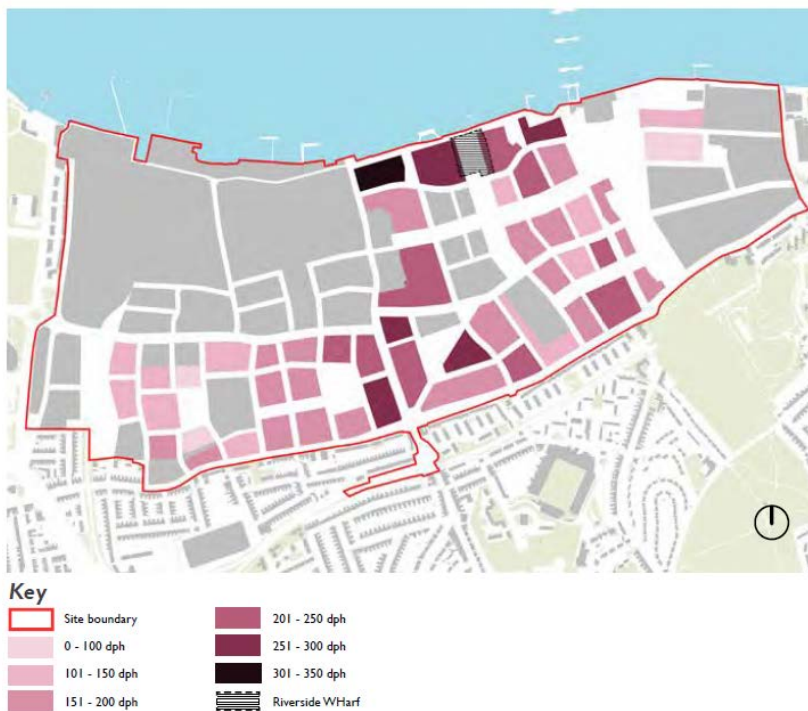


Figure 3 Development Densities

- 4.35 The density of the original submission was highlighted by RBG officers as a concern although this concern was not shared by the GLA who stated that the principle of high density development was supported in this location given the site's location within the Opportunity Area.
- 4.36 The Proposed Development comprises 306 dwellings per ha and 835.94 habitable rooms per ha. In Plot A, the density equates to 255 dwellings per hectare which is generally in accordance with the SPD for this area of the masterplan. There is a higher density of development on Plot B at 407 dwellings per hectare, however, this is the area of the masterplan where larger scale buildings up to 10 storeys are generally considered to be

acceptable and is located within the designed Neighbourhood Centre where higher densities are supported.

- 4.37 It is considered that the density of the Proposed Development is acceptable as it represents an opportunity to deliver high density development as envisaged by the site's Opportunity Area status and as is set out within paragraph 1.3.50 of the Housing SPG. This was explored in great detail within the original submission, and it is still considered that the site meets all of the criteria within the Housing SPG required to justify exceeding the standards set out within the London Plan (Table 3.2). It is also noted that the new Draft London Plan proposes to remove the density matrix and instead rely on design quality indicators to make a judgement on density.
- 4.38 In any event, the density of the Proposed Development has been significantly reduced since the original planning submission from 1,121 hr/ha to 835 hr/ha. As such, it is considered that the proposed development is in accordance with local, regional and national planning policy.

Amenity Space and Open Space

- 4.39 The SPD explains that Charlton Riverside has limited open space with the main component comprising the sequence of spaces linking Woolwich Road to the Thames Barrier, on the eastern edge of the study area.
- 4.40 The SPD explores reasons for this lack of provision, suggesting that the fine grain of land ownership across the site has the potential to make delivery of site-wide open space more challenging and will require co-ordination among land owners and with Royal Greenwich, so ensure delivery of open space that provides for the day-to-day needs of residents and contributes to the character and sense of place at Charlton Riverside.
- 4.41 In terms of expectations of future development, the SPD suggests that there will be an emphasis on accessible, multifunctional open space provided in close proximity to residential development, such that no home will be more than 5 minutes' walk from a substantial open space (i.e., greater than 1 hectare and equivalent to a local park). In addition, the SPD expects that there will be a finer grain of smaller spaces – pocket parks, rain gardens, local play areas and civic spaces within development parcels, providing very immediate and instantly accessible open space adjacent to residential development.

- 4.42 The Council anticipate that private open space will be provided as part of residential development and that roof terraces and gardens should be considered to maximise access to usable open space and minimise impermeable surfaces. The SPD includes an indicative private and semi-private open space diagram at Figure 8.5 which is included below in figure 4.

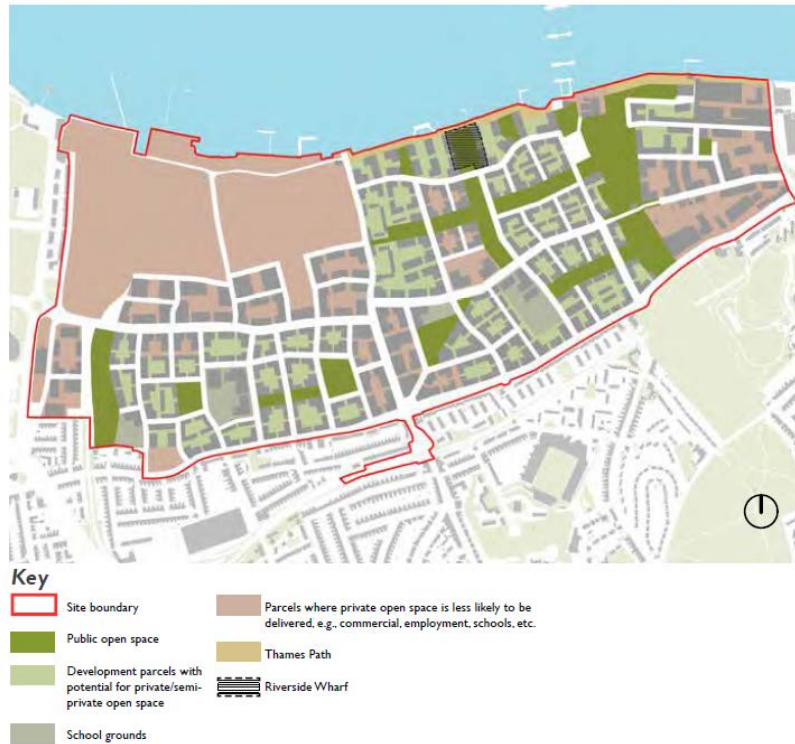


Figure 4 Private and semi-private open space

- 4.43 The revised proposals have seen the provision of open space altered to address the comments of officers following the submission in December 2016. Rather than providing one, large transient open space, the revised proposals include a range of smaller, sheltered residential gardens each with different functions.
- 4.44 The revised proposals have been designed to improve upon the original submission including the introduction of residential and family gardens in Plot A, which can be utilised both by residents and visitors passing through towards the river.
- 4.45 A semi private area of public realm has been introduced into Plot B which seeks to respond to the sites location adjacent to the busy Bugsby's and Anchor Way and help to knit the buildings together with future, neighbouring developments.
- 4.46 In order to fully utilise the site, further shared amenity spaces and private roof terraces are proposed on the roofs of buildings A, B, C, G, H, K and L and are designed for residents.

4.47 The Proposed Development provides an excellent opportunity to vastly improve the provision of open space within the Charlton Riverside area and the revised scheme seeks to fully utilise the site by creating a range of spaces suitable for all users of the mixed use development.

Children's Play Space

4.48 The Charlton Riverside SPD (2017) expects new development to create a healthy environment that encourages walking over using a car, where children can play outside and residents and visitors can enjoy a varied and attractive selection of leisure, recreation and social activities.

4.49 Throughout the SPD the Council note that development is expected to provide safe places for children to play. The revised proposals include a number of areas dedicated to play. A series of key character areas make up the landscape concept which each contribute to a unique sense of identity and help establish a new sense of place.

4.50 This includes a dedicated play street located in Plot A, which provides green space for the residents and play space for the children. Furthermore, there is children's play equipment included throughout the open spaces within plot A, providing a varied selection of spaces for families to use. The quantum of playspace exceeds the GLA requirements and is therefore in accordance with planning policy. Further details of the proposed children's playspace is included within the landscape section of the DAS.

5. Transport and Accessibility

Access/ Highways/ Servicing

- 5.1 The Charlton Riverside SPD (2017) introduces a proposed movement strategy for Charlton Riverside which is based upon the historic network of paths and boundaries. Section 7, of the SPD, sets out discusses this in detail and includes the Council's expectations in terms of street hierarchy, public transport and the introduction of an east west route. The SPD includes a proposed network of streets in Figure 7.1 which is included below in figure 5.



Figure 5 Proposed network of streets

- 5.2 Objective 3 of the SPD is in relation to a connected and accessible Charlton Riverside. This involves creating new, public-transport accessible routes and walkable neighbourhoods throughout the development area, increasing accessibility to the Thames Path, re-designing Woolwich Road to prioritise public transport, pedestrians and cyclists, and creating a green bridge or green link connecting Charlton Riverside with areas south of the Woolwich Road. In addition, the SPD aims to allow for the future provision of a Waterfront Rapid Transit route connecting Thamesmead to the Peninsula via Charlton Riverside.
- 5.3 The SPD clearly demonstrates that a core requirement of the Development Concept is the delivery of a new east-west route extending from the junction of Bugsby's Way and Anchor and Hope Lane to the junction of Warspite Road and Woolwich Road. The SPD states that the route will provide a primary movement corridor along which public transport might run, activating potential development parcels to either side.

- 5.4 In terms of the revised proposals, much of the access, highways and servicing arrangements remain consistent with the original submission. Both plots are accessed from Anchor and Hope Lane via an existing road which will form part of the east - west link proposed by the Council in the SPD.
- 5.5 All of the servicing and waste collection activities will take place within the site, away from the public highway. Service access for buildings D/EF/G and H and access to Imex House is provided via a restricted access controlled road. Restricted service access on plot B is routed along the eastern and southern boundary.
- 5.6 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. Further details of servicing and waste collection, including servicing routes and zones, are set out in the Transport Assessment prepared by TPP.
- 5.7 Following comments from RBG officers, the building lines have been pulled back from the site boundaries to allow for sufficient distance between the site and neighbouring plots and to allow for new routes within the site boundaries. This includes new access routes along the southern and eastern boundaries of both plots. These alterations have been made to ensure that the Proposed Development is compliant with the Charlton Riverside SPD (2017) and will not prejudice further, neighbouring development sites from coming forward.

Car Parking

- 5.8 The Charlton Riverside SPD (2017) states that parking provision will have reference to the relevant Royal Borough of Greenwich and London Plan standards (Parking Standards: Minor Alterations to the London Plan, 2016, GLA). Furthermore, the SPD states that all development proposals should deliver the minimum required in terms of vehicular parking.
- 5.9 The provision of car parking for the development comprises 210 car spaces for 771 residential apartments. This is a ratio of some 0.27 car spaces per dwelling. This is a marginal increase in the quantum of parking from the original submission which is in response to local residents concerns.
- 5.10 A total of 51 accessible bays are provided for the development. This equates to 24% of the overall parking provision and therefore is a higher provision on a pro-rata basis to the proportion of wheelchair adaptable apartments.
- 5.11 It is proposed that the use of all parking bays by residents will be managed and operated through a car park management plan.

- 5.12 The provision of parking and accessible parking bays provided within the scheme have been assessed against the London Plan, The Mayor's Accessible London SPG and the Mayor's Housing SPG and are regarded to be compliant.

Cycle Parking

- 5.13 The Charlton Riverside SPD (2017) states that developments will be expected to provide high quality parking facilities for all cycle users will provide fit-for-purpose, secure, well-located cycle parking, which is essential for supporting the development of cycling as a practical transport choice. Design of cycle parking will have reference to the provisions set out in the London Cycle Design Network Guidance.

Use	Long Stay	Short Stay
Residential	1,203	21
C3 Ancillary		5
D1 Crèche	9	1
Flexible Workspace	38	46
Total Residential	1203	21
Total Commercial	47	52

- 5.14 The security of the cycle stores in both Plots A and B has been considered by dividing the bike areas with caged enclosures to provide better visibility.
- 5.15 The Proposed Development will include a minimum of 1,203 long stay residential spaces, 47 non-residential long stay spaces and a minimum of 73 short stay spaces for all site users in line with London Plan Policy.

Travel Plan

- 5.16 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.

6. Environmental Considerations

6.1 The planning application is accompanied by a revised Environmental Statement (ES) that presents the findings of the assessments that were undertaken as part of the Environmental Impact Assessment (EIA) for the revised submission. 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.

6.2 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.

6.3 The ES also includes a Non-Technical Summary which provides a brief summary of each of the technical assessments that have been undertaken.

6.4 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.

6.5 Whilst the ES should be referred to for a full description of the revised submission'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

- 6.6 The relevant policy in terms of impact on neighbouring amenity has not changed since the submission of the original application in December 2016. The policy position was set out in detail within the original Planning Statement dated December 2016 and has been summarised below.
- 6.7 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.
- 6.8 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.
- 6.9 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

- 6.10 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.
- 6.11 The revised proposals have been designed to minimise impact on the existing residents of the properties on Derek and Atlas Gardens.
- 6.12 Construction of the proposed development would have a gradually increasing effect on the levels of daylight, sunlight, overshadowing and solar glare to residential properties and amenity spaces surrounding the application site as the construction progresses. The effects that are perceptible as the superstructure progresses would be similar, albeit lesser, to those of the completed proposed development.
- 6.13 In terms of the completed development, the revised submission the Proposed Development has been designed to step back to respect these properties such that the impacts to the majority of the residential receptors would be negligible to Minor Adverse, which is considered common within urban environments.

- 6.14 The assessment of solar glare has shown that there would be solar reflections from the top floors of the west façade of Block B-West which could create minor - moderate adverse solar glare effects. Through mitigation these effects have been reduced to minor adverse, which is not considered significant.
- 6.15 In conclusion, the impact of the development in terms of daylight, sunlight, overshadowing, light pollution and solar glare is acceptable.

Noise and Disturbance

- 6.16 The Environmental Statement for the revised submission has demonstrated that the proposed development will have similar, minimal impact in terms of noise and disturbance.
- 6.17 In short, 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.
- 6.18 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. The Environmental Statement concludes that it would be possible to meet the noise emissions limits by provision of standard noise control measures and that the noise effect of fixed plant installations is predicted to be negligible, which is not considered significant.

Energy and sustainability

- 6.19 The relevant policy in terms of impact on Energy and Sustainability has not changed since the submission of the original application in December 2016. The policy position was set out in detail within the original Planning Statement dated December 2016 and has been summarised below.
- 6.20 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.
- 6.21 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.

- 6.22 In terms of energy, the Environmental Statement has identified a risk of overheating within both residential and non-residential parts of the Proposed Development. The report concludes that the cause of this is the large amount of proposed glazing. As such, a number of mitigation measures, including internal and external shading and mechanical ventilation, are proposed to be introduced as part of the revised scheme, which will mitigate the risk of overheating throughout the proposed development.
- 6.23 The Sustainability Assessment included within the Environmental Statement demonstrates that the proposed development would meet a number of key policy objectives, and considers a broad range of sustainability aspects relating to: energy, transport, materials, sustainable waste management water resources, biodiversity, pollution, climate change adaptation, land use and socio economics.
- 6.24 The assessment concludes that sustainability has informed the design process by identifying opportunities and constraints for sustainable development, and the proposed development is therefore considered to respond to both local and regional planning policy requirements.

7. Transport, Social and Community Infrastructure

- 7.1 The Proposed Development seeks to provide a substantial number of new homes which is likely to be first phase of a new residential quarter in the heart of the Charlton Riverside masterplan area,
- 7.2 A key responsibility upon both the Developer and the Royal Borough of Greenwich is to ensure that adequate transport, social and community infrastructure to serve the new residential population is available on first occupation.
- 7.3 The strategy of the SPD is to pool the financial resources realised by the various developments coming forward to deliver significant pieces of local infrastructure within the masterplan area. This includes the delivery of new highway routes and pedestrian connections, new cycle routes and pedestrian crossings, new primary and secondary schools, new healthcare facilities and other local amenities that are necessary for communities to thrive. These financial contributions will enable the Council, working alongside the Developers, TfL and Network Rail and various other public bodies to realise the long term objectives of the masterplan.
- 7.4 Set out below is a summary of how the Proposed Development is seeking to deliver this infrastructure directly in a physical sense or indirectly through financial contributions. It is estimated that there will be a 4 year period of construction which will allow time for various forms of infrastructure to come forward.
- 7.5 The proposed development is liable to pay a Community Infrastructure Levy under both a GLA tariff and RBG tariff. Mayoral CIL and RBG CIL have been calculated to be £1,872,395 and £3,569,028 respectively based on the most up-to-date figures. It is also anticipated that significant financial contributions will be required through the S.106 Agreement which has not yet been finalised.
- 7.6 The development will deliver the following infrastructure directly:
- *The first section of the new east-west route road link through the masterplan area;*
 - *New pedestrian and cycle connections from Anchor and Hope Lane and to the riverside connecting to the Thames Path;*
 - *A new Toucan Crossing is proposed on Anchor and Hope Lane to the south of the Bugsby's Way roundabout to improve pedestrian and cycle connectivity for the area.*
 - *A Zebra Crossing will also be provided at the northern end of Plot B. This facility will assist pedestrian movement across the east-west highway route.*

- *Extensive areas of new public open space and playspace with sustainable urban drainage connections;*
- *Provision of a new crèche to provide child care facilities to serve young families within the development and locally.*
- *Provision of space to accommodate a new healthcare facility, community centre or other forms of D1 community use.*
- *Provision of space to provide local convenience shopping, café/restaurant and leisure uses which will serve both new and existing residents.*
- *Provision of new workspace that will have the capacity to accommodate a range of start-up local businesses creating employment for local people.*

7.7 The development will deliver the following infrastructure indirectly through S.106 Obligations and the Mayoral and Borough CIL:

- *Whilst the Transport Assessment has demonstrated that the demand for additional bus trips generated by the development can be accommodated within the existing network capacity, a financial contribution towards improving bus services / frequencies will be provided to TfL. This will also benefit the wider public within the area and consequently increase the public transport accessibility of the site.*
- *Whilst the Transport Assessment has been demonstrated that the demand for additional rail journeys can be accommodated within the existing network, financial contributions can be used to improve railway station capacity and facilities.*
- *Any highway or public realm improvements deemed necessary by the Council within the vicinity of the site.*
- *Whilst it has been demonstrated that the demand for both primary and secondary school places can be accommodated within the existing schools, the growth projections for the borough suggest that further school places will required by the time the development is completed and therefore CIL contributions can be used by the Council to provide any necessary facilities for the masterplan area.*
- *Depending on the take-up of the D1 space in the development for a new healthcare facility, CIL contributions can be used by the Council to provide new facilities to serve the masterplan area.*

8. Conclusion and Scheme Benefits

8.1 As demonstrated by this Statement, the development proposals have been revised to respond positively to the consultation feedback that has been received during the course of the determination period for the current application (Ref: 16/4008/F). The development proposals have fully taken into account all relevant Development Plan Policies and other material considerations, including the adopted Charlton Riverside SPD (2017).

8.2 The Proposed Development, if consented, will deliver a wide range of planning and regeneration benefits, as summarised below:

- 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 and materials that responds its surrounding existing and future 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 and the Thames Path;
- Future proofs the routes and connections with later phases of the masterplan and is designed to avoid prejudicing the development of adjacent sites;
- Create a range of new open spaces and areas of public realm to serve the future residents needs, with areas for play and relaxation;
- Create new commercial floorspace in Plot B that can both retain existing businesses and attract new types of businesses to the area that will provide a significant uplift in the number and variety of jobs;
- Create new retail, community and leisure spaces that will provide local facilities for existing and proposed residents;
- Deliver new jobs during the construction stage and within the completed development;

- Contribute towards infrastructure requirements in the Borough both directly and indirectly, including the provision of education, health, open space, and transport improvements; and
- 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.

8.3 The scheme has benefited from a thorough consultation process and we believe is now in a form that can be fully supported by all interested stakeholders so that the transformation of this area envisaged by planning policy can begin.