

Planning Board	Agenda Item: 6
9th July 2018	Reference No: 16/4008/F

Applicant: Leopard Guernsey Anchor Propco Ltd

Agent: GVA

Site Address: VIP Trading Estate and The VIP Industrial Estate, Anchor and Hope Lane, Charlton, SE7.	Ward: Woolwich Riverside Application Type: Full Planning Permission
--	--

I. Recommendation

I.1 The Board is requested to grant planning as outlined below:

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

Subject to:

- i) Referral of the application to the Mayor of London as required under the terms of The Town and Country Planning (Mayor of London) Order 2008;
- ii) The satisfactory completion of a Section 106 (S106) Legal Agreement (obligations set out in Section 30); and
- iii) Conditions set out in Appendix 2.
- iv) Members confirming in their decision that account has been taken of environmental information, as required by Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011; and

- v) A statement being placed on the statutory Register confirming the main reasons and consideration of which the Planning Board decision was based were those set out in the report of the Director of Regeneration, Enterprise and Skills as required by Regulations 24 (l) (c.) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.
- vi) Receipt of comments from Scotia Gas Networks Limited (SGN) raising no objection by 30 April with any further conditions or informatives recommended by SGN to be added. Should any objections, be received within this timescale this item is to be returned to the Planning Board.

Background

This application was scheduled to be considered at the Planning Board meeting on 17 April 2018 however it was resolved to defer the application for a Members' site visit.

The Members' site visit took place on 7 June 2018. The report has been updated and Members are requested to consider the content of this report and the recommendation set out below.

2. Executive Summary

- 2.1 Officers have considered the application against the relevant development plan policies in the Royal Greenwich Local Plan: Core Strategy with Detailed Policies 2014 and the London Plan as well as the Charlton Riverside Masterplan SPD, the National Planning Policy Framework and National Planning Practice Guidance and other material considerations and have concluded:
- 2.2 The principle of mixed use development is in accordance with the relevant development plan policies and the vision set out in the Charlton Riverside Masterplan SPD.
- 2.3 The proposed replacement employment space is considered to be of a high quality and has the potential to increase the numbers of jobs on the site compared with the existing industrial uses. Appropriate provision is made through S106 clauses to address the relocation of existing businesses and to ensure that the proposed employment space meets the needs of small and medium sized enterprises and start-ups. Appropriate provision is also made in terms of floorspace for community uses.

- 2.4 The proposal will provide 770 new homes of which 25% would be affordable. The mix of affordable units meets the policy requirement of providing a 70/30 split between social rented and intermediate units. The proposed level of affordable housing has been viability tested and is considered the maximum reasonable amount of affordable housing that can be delivered on the site.
- 2.5 The proportion of family units in the scheme is lower than that envisaged by the Charlton Riverside masterplan SPD as only 17% of units would be of family size. However, this is considered acceptable having regard to the likely impact that an increased level of family housing would have on the overall viability of the scheme.
- 2.6 Some units within the scheme would not achieve the recommended levels for internal daylight and sunlight. However, the provision of amenity space and play facilities exceeds the recommended standards. Overall the standard of amenity for future occupants is considered acceptable.
- 2.7 Parts of the scheme exceed the building heights envisaged by the Charlton Riverside Masterplan SPD however the revised scheme has addressed the relationship between the proposed development and adjacent buildings and it is considered that taller buildings can be supported in the less sensitive parts of the site. The architectural design is of a high quality and the scheme would bring about improvements to the townscape compared with the existing site conditions.
- 2.8 The overall density of the scheme also exceeds the recommended density levels set out in the London Plan and the SPD but is considered acceptable having regard to the site's location within an Opportunity Area and the need to bring forward regeneration.
- 2.9 An assessment of the impact of the scheme upon the significance of heritage assets concludes that any harm to the character and appearance of the recently designated conservation area and its setting and would be less than substantial and that the impacts upon locally listed buildings would not be such as to harm their significance.
- 2.10 Satisfactory standards of residential amenity would be maintained for neighbouring occupiers having regard to the assessment of impacts upon privacy, daylight / sunlight and wind conditions.

- 2.11 Subject to conditions in relation to noise the potential for conflict between the proposed residential use and the nearby safeguarded wharves will be minimised. S106 clauses will be secured to address noise impacts from adjacent commercial uses.
- 2.12 The proposed level of parking is considered appropriate having regard to the current level of public transport accessibility and a range of measures will be secured by condition / S106 to address the transport impacts of the development.
- 2.13 The scheme is liable for both the Mayor's and the borough's Community Infrastructure Levy. A comprehensive package of S106 clauses / contributions will be sought to address the site specific impacts of the scheme. This will include the provision of land / contributions to facilitate the future provision of an east-west access road.
- 2.14 Detailed below is a summary of the application:

The Site -	
Site Area	25,300sqm
Local Plan Allocation	Strategic Development Location Thames Policy Area (part of site)
Heritage Assets	Part of site lies within / adjacent to the Charlton Riverside Conservation Area Adjacent to locally listed buildings: Stone Foundries and Atlas and Derrick Gardens Archaeological Priority Area
Tree Preservation Order	TPO253
Flood Risk Zone	3

Proposed Buildings	
Building height (metres)	Max height 40.05
No. of storeys	2 - 10 Storeys
Floor area (GEA) (m ²)	71,467

Non-Residential Uses		
Existing Uses	Existing use (Classes) / Operator	B2 Business, B8 Storage and Distribution, sui Generis
	m ²	6,431 Breakdown of floorspace within buildings by use not provided
Proposed Uses	Proposed use (Classes) / Operator	Flexible commercial use comprising B1 Business, A1-A3 Shops / Financial and Professional Services/ Restaurants and Cafes, D1 Non-residential Institutions and D2 Assembly and Leisure
	m ²	3,201
	Proposed use (Classes) / Operator	Flexible community use comprising D1 Non-residential Institutions, D2 Assembly and Leisure and C3 ancillary residential facilities
	m ²	909
Employment	Existing number of jobs	90
	Proposed number of jobs	212

Housing		
Density	Units per Hectare (u/ha) and/or Habitable Rooms per Hectare (hr/ha)	305 u/ha 831 hr/ ha

Dwelling Mix	Studio (no. / %)	147 (19.1%)
	1-bed (no. / %)	194 (25.2%)
	2-bed (no. / %)	304 (39.4%)
	3-bed (no. / %)	121 (15.7%)
	4-bed (no. / %)	5 (0.6%)
Affordable Housing	Overall Affordable Housing (no. / %)	193 (25%)
	Private (no. / %)	578 (75%)
	Social Rent (no. / %)	137 (71%)
	Intermediate / Shared Ownership (no. / %)	56(29%)
Housing Standards	Complies with technical housing standards – nationally described space standards and London Plan standards?	See section 11

Transportation		
Car Parking	No. existing car parking spaces	Approximately 139 plus 6 HGV spaces
	No. Proposed Car Parking Spaces	210 (0.27 spaces per unit)
Cycle Parking	No. Proposed Cycle Parking	1,323
	Complies with policy	Yes
Public Transport	PTAL Rating	Average of 4 across site

Sustainability / Energy	
BREEAM Rating	Excellent
Renewable Energy Source (%)	PV panels

Public Consultation	
Number in Support	7
Number of objections	78
Main issues raised	<ul style="list-style-type: none"> • Lack of compliance with the Charlton Riverside Masterplan • Height and massing of buildings • Impact on conservation area • Density • Level of affordable housing • Proportion of family housing • Impacts on local infrastructure • Transport impacts • Impacts on amenity

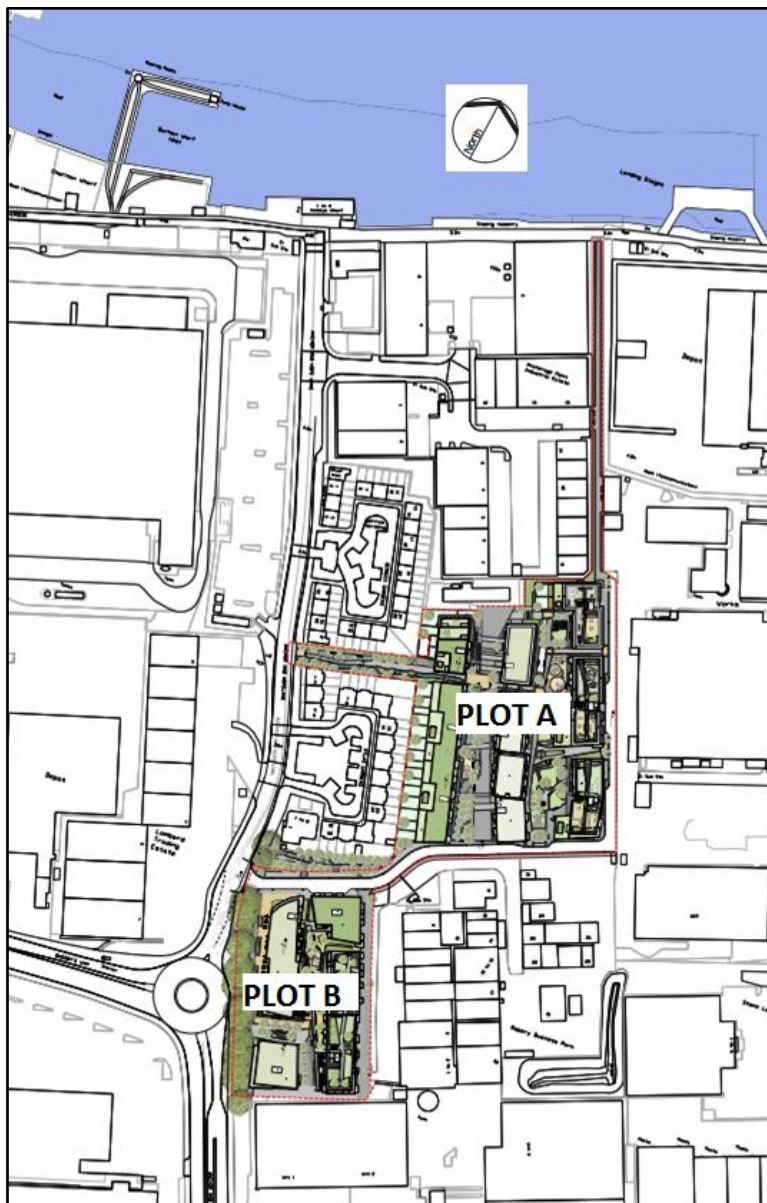
- 2.15 The report details all relevant national, regional and local policy implications of the scheme, including supplementary planning guidance.
- 2.16 The application is considered acceptable and is recommended for approval subject the conditions set out in the report.

Site Plan



3. Site and Surroundings (in detail)

- 3.1 The site is located to the east of Anchor and Hope Lane, close to its junction with Bugsby's Way, within the Charlton Riverside Masterplan area. The site comprises a total of 2.53ha of land and is formed of two plots linked by an access road. Plot A is set back from the road whilst Plot B has a frontage which extends along Anchor and Hope Lane. The application site also includes a narrow strip of land which extends northwards from the north east corner of Plot A to the riverside (where it connects with the Thames Path) and a further strip of land which connects the western edge of Plot A with Anchor and Hope Lane.



- 3.2 Land to the north, east and south of the site is in industrial use. This includes the Anchorage Point industrial estate and Imex House (recording studio) to the north of Plot A, Stone Foundries to the east of Plot A and the Ropery Business Park to the east and south of Plot B. To the west of Plot A and to the north of Plot B are two storey residential properties known as Derrick Gardens and Atlas Gardens. Further to the west, on the opposite side of Anchor and Hope Lane are further industrial units and to the North West, a large supermarket.
- 3.3 The site is currently occupied by a range of industrial buildings which are used for a variety of commercial purposes including a vehicle hire business and car repairs /MOT testing as well as manufacturing, storage and distribution. The strip of land between Derrick and Atlas Gardens is used for the storage of vehicles in connection with a truck repair business.
- 3.4 There is a strip of land located between the existing site access and the residential properties in Atlas Gardens / Anchor and Hope Lane which is currently used for car parking. This strip of land lies outside of the application site boundary. Access to this area is via a gate off the existing access road.
- 3.5 There is a single storey building located adjacent to the site boundary which adjoins the gardens of 27 /28 Derrick Gardens. This is used as an electricity sub-station.
- 3.6 The site is generally flat and is largely hard surfaced. The northern part of the western boundary is enclosed by metal palisade fencing and to the south of the site entrance the boundary treatment comprises a low brick wall with piers with a metal palisade fence behind. There is a row of mature trees situated on the western site boundary adjacent to the wall / fencing. These trees are subject to a Tree Preservation Order.
- 3.7 The site adjoins the Charlton Riverside Conservation Area and part of the site (the area of land between Atlas Gardens and Derrick Gardens falls within the Conservation Area. The residential properties at Atlas Gardens and Derrick Gardens and the industrial premises at Stone Foundries have recently been added to the Council's local list. The proposed development would therefore affect the character and appearance of the conservation area, as well as the setting of the conservation area and locally listed buildings.
- 3.8 There is an existing vehicular entrance into the site off Anchor and Hope Lane which would be retained and modified as part of the proposals. The site has a PTAL which ranges from 3 – 4 with an average of 4 across the site (on a scale where 0 is the worst and 6 is the best).

4. Relevant Planning History

VIP Industrial Estate

- 4.1 On 4 July 2011 planning permission was granted for a single storey industrial building enclosing a commercial spray booth. This was in respect of a revised siting for the building following the grant of the permission below. (Reference: 10/3141/F).
- 4.2 On 30 September 2010 planning permission was granted for a single storey industrial building enclosing a commercial spray booth (Reference: 10/2057/F).
- 4.3 On 25 April 2007 planning permission was granted for a change of use to Sui Generis (vehicle leasing) and erection of a portakabin. (Reference: 07/0541/F).
- 4.4 On 30 October 2003 planning permission was refused for the use of the site for the overnight parking of a maximum of eight lorries and erection of a 2400mm high palisade fence. (Reference: 03/1946/F).
- 4.5 On 25 June 2003 planning permission was granted for the erection of a new 2400mm high palisade fence and two CCTV camera posts (Reference: 03/0306/F).
- 4.6 On 19 December 2001 planning permission was granted for the erection of a three storey office building with parking and landscaping. (Reference: 01/1182/F).
- 4.7 On 1 November 2000 planning permission was granted for the erection of a new single storey building to form offices and site security office with parking and landscaping. (Reference: 00/1987/F).
- 4.8 On 19 January 1993 planning permission was granted for the erection of a first floor extension to existing single storey offices. (Reference: 92/1068/F).

Land between Atlas Gardens and Derrick Gardens

- 4.9 On 17 September 1997 planning permission was granted for the erection of 2 x 2 bed houses at the rear of the site and 2 flats (1 x 2 bed, 1 x 3 bed) fronting Anchor & Hope Lane with parking (97/0539/F).

Imex House

- 4.10 On 3 November 2006 planning permission was granted for the erection of a 4m high vehicle port to south side of site, insertion of new entrance doors with a roller shutter, and erection of 3m high gates and fence with timber screening to south and east of site (Reference: 06/2319/F).

Land adjacent to 29/30 Atlas Gardens

- 4.11 On 7 January 2003 planning permission was granted for the erection of a two-storey block comprising 7 x 1 bed flats and one bedsit for supported housing for young single people (Reference 02/2010/F).

5. Proposals (in detail)

- 5.1 The current application seeks full planning permission for the following:

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

- 5.2 The proposed scheme comprises two plots, Plot A to the north and Plot B to the south. The proposed development within Plot A consists predominantly of residential units with the exception of two areas which are reserved for community / leisure / ancillary residential facilities. The plot is laid out in three rows of buildings which range from two to ten storeys, with the taller blocks sited towards the eastern side of the site. The blocks contain duplex units at ground floor / first floor level with single level flats above.
- 5.3 The proposed development within Plot B comprises flexible commercial space across the whole of the ground floor together with a small area at first floor level. The development is made up of three blocks around the site perimeter, which are connected by a ground level plinth together with garden above, with a stand-alone block at the south west corner of the site. The predominant building height in Plot B is ten storeys, stepping down to a seven storey block fronting the access road.
- 5.4 The existing vehicle access off Anchor and Hope Lane is to be retained and modified to serve the proposed development and to provide a future link as part of the proposed East West route within the Charlton Riverside Masterplan. It is proposed to provide 210 car parking spaces in a basement car park within Plot A. The proposals also include the provision of 1,323 cycle spaces across the two plots.

- 5.5 The scheme includes a pedestrian route through the site which runs east to west from Anchor and Hope Lane between the residential properties at Atlas and Derrick Gardens. This is described as the 'Eco Walk'. A further pedestrian link is planned between the north east corner of the site and the river.
- 5.6 The application was originally submitted in December 2016. Revised proposals were submitted in December 2017 which included a reduction in the number of residential units from 975 to 771. The previously proposed 28 storey tower on Plot B was omitted and a number of other revisions were made to the building heights, massing and layout.
- 5.7 A further set of revised plans and amended documents was submitted in February 2018 which included the following amendments:
- Reduction in height of Building H in Plot A to three storeys with a fourth storey set back
 - Increase in height of Buildings C, E and F by one storey
 - Amendments to window locations to address overlooking between blocks
 - Amendments to balcony locations and provision of privacy screens
 - Amendments to residential mix to provide one less 2 bed unit and one more 1 bed unit
 - Affordable housing increased to 25% by unit
- 5.8 Further changes have since been made to the design of the buildings on Plot B in order to accommodate the future provision of the East West Access Route as envisaged by the Charlton Riverside Masterplan SPD. These changes include:
- The widening of the access road at the entrance to the site
 - Cutting back Building M/N at ground / first floor level and introduction of a curved form to this part of the building
 - Elevation changes to Building M/N
 - Alterations to the layout and mix of units within Plot B

6. Consultation

- 6.1 The application since being submitted in December 2016 has been subject to three rounds of public consultation by the Council, comprising press notices, site notices and 1,001 letters, sent to individual occupiers in the vicinity of the application site. A further consultation with residents in the immediate vicinity

of the site has been carried out with regard to the latest amendments to the scheme. This also included consultation with statutory bodies and local amenity groups. The specific consultation and publicity requirements in relation to an application for planning permission which is accompanied by an Environmental Statement have been met.

6.1.2 Public exhibitions were also held by the applicant on 2nd and 3rd March 2018.

6.2 Statutory Consultees

6.2.1 A summary of the consultation responses received along with the officer comments are set out in table below:

Details of Representation and date received	Summary of Comments	Officers comments
Secretary of State for Communities and Local Government	Acknowledged receipt of Environmental Statement. No further comments to make.	Noted
Greater London Authority	<p><u>Land use</u></p> <p>The proposals will result in the displacement of existing industrial uses. The applicant must provide a suitable relocation strategy to support existing tenants.</p> <p>Revised existing and proposed employment density calculations should be provided.</p> <p>The provision of employment uses on Plot B and the location of community uses on Plot A appropriately reflects the different character areas envisaged by the SPD.</p> <p>The increase in non-residential floorspace is also supported in accordance with the employment aspirations of the SPD and Opportunity Area.</p>	The issues raised are discussed in the relevant sections of the report.

	<p>Further clarity is required on the proposed BI workspace and whether this will be suitable for BIc uses.</p> <p>The applicant's engagement with workspace providers is welcomed. Further information on the proposed commercial strategy for the employment floorspace should be provided.</p> <p><u>Affordable Housing</u> Officers acknowledge the increased affordable housing offer to 25% by habitable room based on a 70:30 affordable rent: intermediate tenure split.</p> <p>The conclusions of the independent viability assessment should be shared in full with GLA officers for review when available. Further information on the affordable rent levels and income thresholds for the intermediate units must be provided.</p> <p>Early and late stage reviews will be required.</p> <p>The applicant will be expected to explore all opportunities to secure grant funding to boost affordable housing supply above the maximum reasonable amount.</p> <p><u>Design</u> Overall, the revised scheme responds more positively to the scale, massing, and</p>	
--	--	--

	<p>architecture/material aspirations of Charlton Riverside Masterplan SPD.</p> <p>The overall reduction in scale, particularly the removal of the 28 storey tower on Plot B and the two tall buildings on Plot A, is supported and achieves a more appropriate response to the masterplan context whilst optimising housing delivery in accordance with Policy H1 of the draft London Plan.</p> <p>The lower scale and more intimate residential character of Plot A, supported by the location of the proposed crèche and community use on this site and integrated play space is supported, and is considered a much more successful design response compared to the previously proposed massing arrangement for this plot.</p> <p>The reduction in scale of the town houses which provide back to back terraces with the existing Derrick and Atlas Gardens properties is also supported and helps knit the development into the existing residential urban grain in this area.</p> <p>The ground floor of Plot B will be well activated by the proposed flexible employment uses on all public facing edges helping resolve those issues raised at the initial consultation stage. The</p>	
--	--	--

	<p>increased public realm offer on Plot B is also supported.</p> <p>The overall site layout maintains the delivery of a section of the primary East-West route which is key to the future connectivity of the wider masterplan area and is supported.</p> <p>This route will act as a future high street and as such, development proposals must contribute to this function through providing well activated/animated frontages onto this route.</p> <p>Officers raise concerns that the building orientation on Plot A has the potential to provide a poor frontage across two thirds of this site, providing blank gable end facades with little engagement with the street and further consideration should be given to how the buildings and public realm proposals in this area can make a positive contribution to this future route. This should also be supported by street-level visuals in this area.</p>	
Environment Agency	<p>Previously objected on grounds of risk to users of the basement car park.</p> <p>Noted that habitable accommodation at ground floor level is proposed. Advised that this may be acceptable subject to the council being satisfied that it is safe from flooding.</p>	<p>Flood risk is assessed in section 24. Relevant conditions are included at Appendix 2</p>

	<p>No objection in relation to revised proposal subject to a condition to secure a scheme to demonstrate that users of the basement car park will have sufficient time to reach safety.</p> <p>Also recommends conditions in relation to ground water protection.</p>	
Historic England (Archaeology)	No objection subject to conditions	Conditions are included in Appendix 2.
Historic England	This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.	This advice is noted.
Network Rail	<p>Raised concerns about ability of local railway stations to cope with increased passenger demand.</p> <p>Any residential development should not prejudice the existing or permitted use and operation of the Aggregates depot.</p>	<p>Impacts upon public transport are assessed in Section 20.</p> <p>The impacts upon the safeguarded wharves are addressed in Section 19.</p>
South Eastern Railways	No response received	
Transport for London	<p>Previously raised concerns regarding the ability to deliver the East –West access route outlined in the Charlton Riverside Masterplan SPD and requested further information in relation to matters including Blue Badge parking and cycling provision.</p> <p>Following the receipt of revised plans and further information the following comments are provided:</p>	<p>Transport matters are assessed in Section 20.</p> <p>The requested conditions are included in Appendix 2.</p> <p>A contribution towards local cycle / pedestrian improvements will be secured by a S106</p>

	<p>Pleased that the required width has been delivered. Further details regarding its design can be delivered at a later date.</p> <p>TfL acknowledges the location of a site, and that the east-west route could not be created from an eastern arm to the Bugsby's Way and Anchor and Hope Lane junction</p> <p>TfL accepts the methodology in relation to the PTAL assessment</p> <p>The further justification in relation to healthy Streets is noted.</p> <p>TfL would welcome further discussions with the applicant and RBG in relation to potential improvements to local cycle / pedestrian networks.</p> <p>Methodology in relation to non-residential trip generation is accepted.</p> <p>Noted that the catchment of the nursery will be from local demand</p> <p>The revised data in relation to passengers accessing Charlton Station is noted.</p> <p>The amount of Blue Badge parking is acceptable, details of their management should be included in the car park management plan.</p> <p>TfL still believe the amount of parking provision is too high given the site's location in an Opportunity Area - The Draft</p>	agreement.
--	---	------------

	<p>New London Plan states that any development within Inner London Opportunity Areas should be car-free. As such TfL will request that car parking is minimised in this location and therefore the car parking proposed for this development is too high and not compliant with the Draft New London Plan.</p> <p>20% of parking spaces should have active charging points with all the remaining spaces provided with passive provision – to be secured by condition</p> <p>The details and amount of cycle parking could be secured by condition plus details of shower and storage facilities</p> <p>A detailed Construction Logistics Plan should be secured by condition</p>	
London City Airport	<p>No objection.</p> <p>Advised that London City Airport should be consulted on the use of cranes on site.</p>	<p>Conditions in relation to the use of cranes are included at Appendix 2.</p>
Port of London Authority	<p>The PLA welcomes the constructive discussions that have taken place between the various parties. This has allowed significant positive progress to be made with application 16/4008/F and the proposed conditions. However, one area remains where it has not yet been possible to reach agreement. This relates to the expected noise levels that</p>	<p>The recommended conditions set out in revised Appendix 2 include provision for the mitigation of noise impacts to balconies.</p>

	<p>would be experienced on the balconies of the residential properties – in particular plots D, F and G.</p> <p>At these plots it has been established that the rating levels are 10 dB or more above the background levels. In planning terms this means that potentially significant adverse impacts would be experienced by users of the balconies.</p> <p>It is essential that adequate noise mitigation is provided to all of the proposed residential properties to ensure that the requirements of planning policy are met and to reduce the potential for noise complaints regarding the safeguarded wharves. Any noise complaint could ultimately impact on the operation of these strategic facilities both in terms of the types of operations that they can undertake and their hours of operation.</p> <p>The PLA would therefore request that either consideration of application I6/4008/F is deferred to allow agreement to be reached on the noise conditions or if Members resolve to approve the application, that the conditions proposed by the Operators are applied in full as they currently stand.</p> <p>Following further correspondence with the applicant it is confirmed</p>	
--	--	--

	that the previously raised concerns in relation to the impact of 24 hour lighting have been addressed.	
Sport England	<p>Confirmed this is a non-statutory consultation as the site does not form part of or comprise a playing field.</p> <p>Encourages the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport.</p> <p>Recommends that the following are included in the proposal:</p> <ul style="list-style-type: none"> • Connected walking and cycling routes; • Appropriate infrastructure e.g. cycle parking • High quality streets and spaces; 	<p>New sports facilities may be delivered through CIL.</p> <p>The proposed facilities within the development are discussed in Section 12.</p>
NHS England	No response received	
NHS Greenwich CCG	<p>Stated that space is needed to meet future growth.</p> <p>Indicated a preference for a single health facility for the masterplan area.</p>	
Natural England	<p>No objection in relation to statutory protected sites.</p> <p>Standing advice should be consulted in relation to protected species.</p>	Conditions are included at Appendix 2.

	Biodiversity and landscape enhancement measures should be secured through the scheme.	
Metropolitan Police	<p>The Designing Out Crime Officer's comments remain unchanged from those made in relation to the previous proposals.</p> <p>Recommends that a condition is imposed requiring the development to meet the Secured by Design standard.</p> <p>A request was made for space within the development to provide operational facilities for the Police.</p>	<p>Security and community safety are assessed in Section 26.</p> <p>Space to provide this facility has been included in Plot B and will be secured by a S106 clause.</p>
London Fire & Emergency Planning Authority	Previous comments confirmed the LFPA was satisfied with the proposals.	
Thames Water	<p>Existing waste water and water supply infrastructure have insufficient capacity to accommodate the needs of the proposal.</p> <p>Recommends conditions requiring the approval of a detailed drainage strategy and a water impact study. Recommended a condition in relation to piling.</p> <p>Pending a decision on the viability for the strategic deep bore soakaway system, notes that underground attenuation is required, however, underground storage should be considered only when source control options have been maximised.</p>	Conditions and informatics are included at Appendix 2.

	<p>Requests evidence of how the surface water drainage strategy for this development follows policy 5.13 of the London Plan.</p> <p>Water: A modelling study should be completed to understand the impact of the new development on the existing water network. This should look at the capacity of the existing water network, the current and future potential demand upon that network, fire flows, a suitable point of connection proposed for the development and if any reinforcements are required to the network.</p> <p>Waste: Thames Water are currently liaising directly with the developer and drainage consultants and have requested the following information:</p> <ul style="list-style-type: none"> - Plot A - Confirmation why the existing connections at Plot A cannot be re-used, confirm where these connect to and confirm the downstream pipe size. The loss of the existing connections from Plot A will result in a net increase in flows into the combined trunk sewer in Anchor and Hope Lane. - Plot B - Within the design there is information missing on the 2 incoming foul sewers to the east of Plot B. Confirmation how these flows will be diverted or accommodated, confirm if these sewers are live and approx. flow rate, pipe size. - Confirmation that surface water 	
--	---	--

	<p>on Plot B connects to the residential housing, pipe size and re-use to be confirmed.</p> <p>Thames Water are working co-operatively with the developer to agree an infrastructure strategy for surface water for this development site, and in the context of future development within the Opportunity Area.</p>	
Scotia Gas Networks	Objects pending detailed assessment.	An update will be provided once further comments have been received from SGN.
EDF	No response received.	
UK Power Networks	Confirmed location of cables. Advised on safe digging practices.	
Zayo Group UK (fibre optic cables)	Confirmed location of apparatus. Advised on need for trial digging and procedure for diversionary works.	

6.3 Council Departments

6.3.1 A summary of the consultation responses received along with the officer comments are set out in table below:

Details of Representation and date received	Summary of Comments	Officers comments
Tree Officer	Requested that trial digging is carried out to confirm the location of roots. Confirmed that this can be secured by a condition.	Conditions in relation to tree protection are included at Appendix 2.
Building Control	No objections	
Transport	No objection subject to	Transport issues are

	conditions	assessed in Section 20.
Sustainability & Renewal	<p>Sustainability are satisfied with the energy efficiency targets that the applicant has proposed but requested that an updated Energy Statement is provided to confirm that each dwelling achieves a minimum 35% CO2 emission reduction and each building achieves a minimum 35% CO2 emission reduction.</p> <p>Sustainability is satisfied that the applicant is targeting a BREEAM “excellent” rating, however it is suggested that further credits are targeted to ensure the final development can secure the minimum 70% score as credits are often lost during the construction phase.</p> <p>Would encourage the applicant to investigate alternative heating solutions to deliver long term carbon reduction benefits and to take a collaborative approach with other developments in the wider area.</p> <p>Satisfied with the ecological improvements proposed.</p>	<p>Sustainability issues are assessed in Section x.</p> <p>Conditions are included at Appendix 2.</p>
Housing Strategy and Partnerships	<p>The tenure split is 71/29% which is satisfactory.</p> <p>40% of units should be family size units – 26 x 3beds; 33 x 2beds and 10 x 1beds.</p> <p>10% wheelchair units are required.</p>	<p>Housing mix is assessed in Section 13 and affordable housing provision is assessed in Section 14.</p>

	<p>Parking spaces are required close to the blocks and on the ground level.</p> <p>All accommodation should be designed in accordance with the HCA's latest Scheme Development Standards and Lifetime Homes Standard by the Joseph Rowntree Trust, Mayor' SPG 2012, Greenwich Wheelchair site brief.</p> <p>A clear commitment to regulated CO2 emissions savings compared to a Part L 2013 of the Building Regulations is required.</p> <p>In addition to providing private amenity space, public amenity of high quality in terms of design and materials should be available and accessible to all tenures in the development particularly in high rise buildings of this type.</p> <p>The rents for three beds and above are required to be Target Rents of 50% and those of one and two beds not to exceed 80% of open market rent inclusive of service charges.</p> <p>Service charges should be kept affordable and should be consulted with RBG.</p> <p>These comments are subject to the outcome of the viability review.</p>	
Waste Services	No objection subject to a condition to secure a detailed	A condition is included at Appendix 2.

	waste management plan	
Pollution	<p>It is known that this area has a significant industrial legacy. Conditions are therefore recommended in relation to contaminated land.</p> <p>Reviewed the conditions proposed by the applicant and wharf operators and advised that the level of noise exposure likely to be experienced by occupants at the affected balconies may result in complaints of noise nuisance unless controlled by condition.</p> <p>Confirmed that the proposed mitigation for noise impacts from Stone Foundries is acceptable.</p> <p>Satisfied with the responses provided by the applicant in relation to air quality – no adverse comments.</p> <p>Also recommended that the condition in relation to the Air Quality Assessment / Air Quality Neutral be removed as the submitted details are sufficient.</p> <p>Confirmed that further monitoring of air quality is still required for the proposed crèche but agreed that a 6 month timescale would be acceptable.</p>	<p>Contaminated land is discussed in Section 25.</p> <p>Noise and air quality are assessed in Section 19.</p>
Community Safety	No response received	
Parks & Open Spaces	No response received	

Occupational Therapists	Requested further information / amendments	Conditions are recommended requiring the submission of detailed drawings showing internal layouts which comply with the required standards.
Education	<p>Identified an increasing demand for school places in the north of the borough, driven by new developments.</p> <p>Noted that options for expanding existing schools are becoming limited, and suitable sites for new schools are hard to find. New schools identified in the Charlton Masterplan and on the Peninsula are unlikely to be available for some years.</p> <p>This development therefore increases the risk of a shortage of school places in the local area in future years.</p>	This will be covered by CIL.
Children's Services	Advised that if this is to be a registered childcare setting the requirements of the Department for Education's 'Statutory framework for the early years foundation stage' will need to be met.	Noted
Adult and Older People Services	No response received	
Public Health	<p>No objection in principle.</p> <p>Advised that a targeted health impact assessment should be carried out to consider the following: affordable housing,</p>	Noted

	affordable workspace and access to local healthy food, community safety. Also advised that the development should demonstrate how the Mayor of London's Healthy Streets principles have been addressed.	
Flood Risk Officer	<p>Satisfied with the proposed drainage strategy.</p> <p>Recommends a condition to secure a SuDS maintenance plan.</p> <p>Recommends that the parts of the development which could flood be constructed using flood resilience techniques, in particular the townhouses and that the townhouses and commercial properties should opt into the flood warning service.</p> <p>No objections to surface water strategy but requested further information.</p> <p>Concerned that habitable rooms at ground floor level may be converted to bedrooms.</p> <p>Agrees with EA concerns about basement car park.</p> <p>Would like to see evacuation plan for the crèche.</p> <p>Emergency warning and evacuation plan should be secured by condition.</p>	Flood risk is assessed in Section 24.
Corporate Property	No response received	

Conservation Officer	<p>Considers that the proposed height, scale and bulk of the development is respectful of the existing townscape and relates to the well with the surrounding buildings. It is considered that whilst there will be a degree of impact to the setting of the Charlton Riverside Conservation Area the proposed development will not cause any significant harm.</p> <p>Recommends that all proposed building materials are conditioned to be approved by the Planning department prior to commencement of works.</p>	
-----------------------------	--	--

6.4 Amenity Groups

6.4.1 A summary of the consultation responses received from Amenity Groups, along with the officer comments, is set out in table below:

Details of Representation and date received	Summary of Comments	Officers comments
Charlton Society	<p>While we welcome the efforts made by Rockwell to amend their original proposals, the new ones unfortunately still remain largely unacceptable.</p> <p>This is almost entirely due to their disregard of the approved Charlton Riverside Masterplan SPD, a disregard that also sets a dangerous precedent for the general development of the Riverside.</p>	These comments are noted and the issues raised are discussed in the relevant sections of the report.

	<p>Particular concerns are raised in relation to:</p> <p>Building heights in excess of the recommended 3-6 storeys</p> <p>Impacts on existing topology and fabric including views of hillside in Charlton and intrusion on the historic landscape</p> <p>Place-making – proposals at odds within the intimacy typical of Charlton’s residential fabric and the antithesis of urban and civic place-making</p> <p>Density – extrapolation of proposed densities for Plots A and B across the Riverside indicates a density at least twice as great as that recommended in the SPD.</p> <p>Other discordant features of the proposals included affordable housing, family homes, green spaces, community facilities, shopping facilities traffic impacts and sustainability.</p> <p>The application suggests that the SPD is unlikely to play the role and have the guiding influence that we were led to believe it would.</p> <p>We are determined that Charlton Riverside does not have to submit to the same fate that eventually befell the Peninsula (parts of the Millennium Village excepted): a betrayal of sustainability, good planning and fine, modern design</p>	
--	--	--

	in the service of people and sympathetic place-making.	
Charlton Central Residents Association	<p>This development will be the first major development along Charlton Riverside, and will set a standard for the whole area for years to come.</p> <p>The recent submission by the developer, disappointingly offers 25% affordable housing, and less than 20% family housing.</p> <p>The current form of the development does not complement existing homes nearby and the opportunity to reflect the maritime heritage of the area has been missed.</p> <p>The design needs to be reviewed to break up the height profile in taller blocks, create more visual interest.</p> <p>The proposal remains too massive. The scale violates the aims of the masterplan.</p> <p>Major elements of infrastructure should be agreed before supporting the application.</p> <p>CCRA is very concerned that the recent proposals will undermine the vision of the Charlton Riverside Masterplan.</p>	These comments are noted and the issues raised are discussed in the relevant sections of the report.
Greenwich Conservation Group	Concern is expressed about the way in which the proposals are presented and about the recent consultative process.	These comments are noted and the issues raised are discussed in the relevant sections

	<p>Whilst a number of the changes which have been made to the earlier proposals are welcome several other important features remain very objectionable. In most cases they are departures from the approved Charlton Riverside Masterplan SPD. The proposed departures from the SPD would set a bad precedent for development elsewhere on Charlton Riverside and in the RBG generally.</p> <p>The SPD recommends that most buildings should be 2-6 storeys and a highly selective approach to buildings taller than this except on the immediate waterfront where 10 storeys are judged acceptable.</p> <p>The resulting number of 10 storey blocks would create a very dense urban form and, in our view, poor living conditions. This will not be significantly alleviated by the spreading of the open space in smaller parcels across the site.</p> <p>The proposed number and siting of 10 storey buildings would have a major impact on views from and towards Charlton Village.</p> <p>The provision of affordable housing units at 21.5% is well below the target of 35% and comes with a caveat about financial viability and the possibility of downward revision at a later stage.</p>	of the report.
--	--	----------------

	<p>The amount of family housing at 24% is also well below the SPD target of 50%. No adequate reasons are given for this and we object to a proposal which so significantly ignores the established need for family housing in Greenwich.</p> <p>The density of proposed residential development is excessive; it exceeds the guidelines in the London Plan, RBG's Core Strategy and the SPD.</p> <p>One consequence of the higher densities is a poor quality built environment for residents of the new buildings: canyon like spaces between buildings, open spaces that are more decorative than useful for play and recreation and an absence of distinctiveness and sense of place</p>	
Derrick and Atlas Gardens Residents Association	<p>The proposal is essentially pretty much unchanged. The developers have not listened and have not taken heed, to a satisfactory degree, of the Charlton Riverside Masterplan, the London Plan, the Royal Greenwich Core Strategy and the National Policy Planning Framework.</p> <p>Specific concerns relate to:</p> <ul style="list-style-type: none"> • Impact upon the conservation area, in particular the applicant's refusal to reduce the height of the building on Anchor and Hope Lane • Loss of sunlight, privacy and amenity – more detailed data is 	<p>These comments are noted and the issues raised are discussed in the relevant sections of the report.</p>

	<p>required with regard to the specific impacts</p> <ul style="list-style-type: none"> • Lack of parking spaces • Lack of family sized units • Impact on school places • Impact on bus services and trains • Traffic generation • Low level of affordable housing • Proposed homes not affordable to local residents • Validity of profit margin used in viability assessment • Provision of only £200,000 for infrastructure • No plans in place to address infrastructure • Air quality assessment based on original rather than revise scheme • Air quality assessment does not include reference to certain pollutants • Four lane east west route would cause a major barrier for residents • Lack of integration of existing and new developments • Impact on community, safety, cohesion and identity arising from high rise development • Density is not justified by reference to transport hub 	
Transport for Charlton	<p>Raised the following concerns in relation to the original proposals:</p> <ul style="list-style-type: none"> • Impact on train and bus services at peak times • Impacts on health services, education provision and local infrastructure 	<p>These comments are noted and the issues raised are discussed in the relevant sections of the report.</p>

	<ul style="list-style-type: none"> • Displacement of businesses and jobs / impact on local economy • Proposals would go against the principles of the Charlton Riverside Masterplan. <p>No further comments were received in response to the more recent proposals.</p>	
--	---	--

6.5 Local Residents and Businesses

6.5.1 87 consultation responses (79 objecting and 7 in support) were received from local residents or businesses. A summary of the comments made in response to each round of consultation is provided below.

Consultation on revised plans submitted April 2018

Summary of Comments	Officers comments
Unacceptable level of affordable housing	These issues have been raised in previous representations and are addressed in the report.
Proposals contrary to the Charlton Riverside Masterplan SPD	
Unacceptable level of family housing	
Building heights excessive	
Excessive density	
Proposal will set a precedent for future development	
Lack of explanation as to how the proposal relates to the aspirations set out in the recent Conservation Area Consultation	
Design of buildings is dull and predictable	
No rationale for pushing the application through prior to publication of the new London Plan	
Lack of detail about how infrastructure will be provided	
Concerns about access to adjacent recording studio	

Unacceptable building heights adjacent to Imex House	
Impact on light levels at Imex House	
Developer should cover cost of soundproofing to adjacent recording studio	
Previous concerns remain about impacts upon the Ropery Business Park	
Proposals will result in congestion and poor air quality	
Too much parking for size of development	
Impact on parking for existing residents	
Impacts on public transport	
Further revisions to the proposals and public consultation are needed	
Impact on daylight to existing properties	
Overlooking of properties in Derrick and Atlas Gardens	
Subsidence / foundation damage / flooding to neighbouring properties	
Increased security risk	
Neighbourhood will be cut off by East – West carriageway	
Developer proposed taller buildings at outset to give the impression of compromise	
Building heights of adjacent properties have been incorrectly stated so they appear larger	The drawings showing the proposed development in relation to adjacent buildings have been checked and are considered to be accurate.

Details of Representation	Summary of Comments	Officers comments
Wharf operators	Confirmed acceptance of the noise conditions as revised.	Please refer to conditions in Revised Appendix 2.

Consultation on revised plans submitted February 2018

Summary of Comments	Officers comments
Recent amendments still do not meet the principles of the Charlton Riverside Masterplan	Compliance with the Charlton Riverside Masterplan SPD is discussed in Sections 9, 16 and 32.
Density does not conform to SPD and would set precedent for the rest of the area	Density is discussed in Section 10.
Design out of character with the area	Design issues are assessed in Section 16.
Local design characteristics not picked up e.g. maritime nature of site	
Massing is too great and needs to be broken up	
Height of buildings is excessive and not in accordance with the Masterplan	
Does not meet low to medium rise / mansion block form set out in SPD	
Buildings directly behind Derrick and Atlas Gardens should be reduced in height and be more gradually stepped	
Tall buildings will discourage social engagement	
Units near to Atlas and Derrick Gardens should be actual town houses rather than duplexes with flats above	
Block behind Derrick Gardens is still too tall	
Proposed flats will disfigure the neighbourhood	
The impact on the proposed conservation area has not been considered	The conservation area has now been designated. An assessment of the impact of the development on the conservation area is provided in Section 16.
Proposals are not in keeping with conservation area	

Loss of light and privacy to Derrick and Atlas Gardens	Impacts upon amenity are assessed at Section 18.
10 storey building would have overbearing impact upon Atlas Gardens / 1-8 Anchor and Hope Lane	
Impact on light and privacy at property in Inverine Road	This property is not within the immediate vicinity of the site and is unlikely to be significantly affected.
Noise nuisance from congestion and overcrowding	Noise is discussed in Section 19.
Concerns about security from green walkway	Security issues are assessed in Section 26.
Lack of clarity about boundaries and pathways between the development and adjacent properties	The site boundaries and access routes through the site are shown on the submitted drawings. Further details of landscaping and boundary treatments will be secured by condition.
A pathway should be provided along the rear boundary of properties in Atlas and Derrick Gardens with access into the site	This comment is noted however such an arrangement does not form part of the proposals being assessed.
Lack of family housing	Housing mix is assessed in Section 13.
Housing mix does not meet the needs of the community	
Lack of age appropriate housing	
Proposed affordable housing is still inadequate	Affordable housing provision is assessed in Section 14.
Rent levels need to be genuinely affordable to borough residents	
Homes for sale will not be affordable by local residents	
Viability report states £200,000 for infrastructure which is	

inadequate	
The high profit margin of 17-18 % against 25% affordable housing cannot be justified	
Developers should be obliged to meet the affordable housing target without regard to arguments of profitability.	Core Strategy policies and the Mayor of London's SPG allow viability to be taken into consideration when assessing affordable housing proposals.
If not viable through private speculative development land should be sold to permit alternative approaches by parties less concerned about profit	
Development will exacerbate existing traffic congestion	Transport issues are assessed in Section 20.
The increase in public transport use in the Transport Statement is understated	
Transport Assessment has not assessed actual rush hour conditions at Charlton Station	
Increased traffic associated with recent retail development needs to be taken into account	
Transport Assessment downplays the increase in traffic on Anchor and Hope Lane	
Neighbourhood will be cut off by the proposed four lane highway	
Impacts on parking for Atlas and Derrick Gardens	
Impacts on overstretched infrastructure not addressed	Infrastructure provision is assessed and details of planning contributions are provided in Section 30.
Additional pressure on school places	
Proposals will result in loss of small businesses	Impacts upon existing businesses are assessed in Section 9.
Further retail provision in the area is not needed	The proposed non-residential uses are assessed in Section 15.
Community spaces should provide for all sections of community not just a gym	

Lack of accessible green space within the development	Public open space provision is assessed in Section 12.
More permanent greenery including larger trees should be provided	Landscaping is assessed in Section 17.
Development is not carbon neutral	Energy and sustainability are assessed at Section 23. A carbon offset payment will be secured by a S106 agreement
Development will add to air pollution	Air pollution is assessed in Section 19.
Existing access rights to the recording studio at Imex House need to be maintained, including access for tour bus.	A plan has been submitted which demonstrates that access can be maintained
Enhanced soundproofing to the adjacent recording studio should be provided at the developer's expense.	This will be secured through a S106 agreement
Loss of light to the adjacent recording studio.	A recording studio is considered to be a less sensitive use in terms of needing access to light. The impact on this property is considered to be acceptable.
Noise, pollution and congestion at the construction stage	Impacts arising at the construction phase are assessed in Section 18.
There should be no interruption to utilities during the construction works.	This does not fall within the scope of the planning process
Construction impacts on foundations of nearby properties	The applicant has agreed to pay for

	surveys of the neighbouring properties and to rectify any problems.
The development will increase the cost of housing in the area	This is not a material planning consideration
Objections from wharf operators in relation to noise may be overcome by conditions however objections remain until conditions are agreed	This issue is discussed in Section 19.
Some reports rely on data from 2016 and are not relevant to the new development configuration	Supplementary reports have been submitted where relevant and this information is considered sufficient to determine the application.
London borough of Newham should be consulted	Officers have reviewed the location of the site relative to the borough boundary and have concluded that such consultation is not necessary in this instance.
Application should be deferred until the new London Plan and conservation area designation have been finalised	<p>The conservation area has now been designated and the impacts of the development on the character and appearance of the conservation area have been assessed.</p> <p>It is not reasonable to delay determination of the application pending the approval of the new London</p>

	Plan.
Comments in support	
Support the need for new housing development	These comments are noted
Supports the masterplan development	
Application will help to improve housing, business development, tourism and enhanced usage of the river front	
Proposal unlocks unused land for the use of different income earners and individuals of diverse backgrounds which enhances the community	
Revised plan has created a respectful and neighbouring height and distance away from long standing residents of Herringham Way and Derrick and Atlas Gardens.	
Pockets of green space and extended east-west route are supported. This will alleviate pressure stress and congestion off the Woolwich Road.	
Proposed scheme will act as catalyst for wider regeneration across the masterplan area	
Development will deliver improved local environment and public realm	

6.5.2 A representation has been received from Matthew Pennycook MP a summary of which is provided below:

Recognises the considerable progress made since the application was submitted in December 2016 however the revised application still falls short of the kind of development needed to ensure the vision for Charlton Riverside is realised. Objects on grounds relating to the following:

- Height and massing
- Design
- Affordable housing
- Housing mix
- Level of parking is too high

Consultation on revised proposal submitted in December 2017

Summary of Comments	Officers comments
Proposals do not comply with the agreed masterplan for the area, including building heights and lack of family housing.	Compliance with the Charlton masterplan is addressed Sections 9, 16 and 32.
Proposal is an ad hoc and disjointed piece of development that continues to fail to meet and undermines the aims and visions of the SPD	
Fails to achieve desired environment for Neighbourhood Centre or Charlton Park.	Community uses are included within the development as well as publicly accessible open space which will help to create a sense of place
Scale of built form fails to create community hub or sense of place	
Development does not address Charlton's industrial past or maritime history	Heritage considerations are addressed in Section 16.
Lack of formal consultation with the community on the revised plans	Additional public consultation events were organised by the applicant and held in early March
Properties at Atlas and Derrick Gardens will be overlooked	Impacts upon privacy are assessed in Section 18.
Revised plans have not reduced height of buildings behind Derrick and Atlas Gardens	The buildings have been reduced in height where they are closest to Derrick and Atlas gardens to improve the relationship with these properties.
Overshadowing of existing houses at Atlas and Derrick Gardens from the south	Impacts upon daylight and sunlight are assessed in Section 18.
Six and ten storey buildings will reduce daylight to	

properties in Atlas and Derrick Gardens	
Proposed tree planting against boundary will reduce light to gardens / properties in Atlas and Derrick Gardens	
Boundaries and public access behind existing properties are not clearly defined raising security concerns	Details of boundary treatments and landscaping to all the publicly accessible areas will be requested by condition.
Impact on rights to light	This is not a planning consideration but is covered by separate legislation
Influx of people will affect public transport, hospital, schools, GP surgeries	Infrastructure is assessed and details of planning contributions are provided in Section 30.
Offer of under £6m is derisory	A full breakdown of S106 contributions is provided in Section 30.
Lack of provision for investment in health, education, public transport	Infrastructure is assessed and details of planning contributions are provided in Section 30.
Proposal does not address shortage of family housing in the borough	The mix of proposed housing is assessed in Section 13.
Existing traffic conditions and pollution levels underestimated by the 2016 Traffic Report carried out by the council	Transport issues are assessed in Section 20.
The number of parking spaces is too high	
No road or public transport investment or mitigation is proposed	

Road congestion will worsen	
Improved transport links are needed - overcrowded buses and congestion are already a problem	
Access road should be wide enough to accommodate two way buses	
Traffic assessment is outdated and unrealistic	
Transport impact assessment does not take account of significant new retail development on Busby's Way	
Proposed access road diverts from the masterplan route and creates an awkward angle for buses to turn into	
Transport impact assessment does not take account of significant new retail development on Busby's Way	
Increased pollution from idling engines as a result of high volumes of vehicles.	Air quality issues are addressed in Section 19.
Cycling and walking need to be made safer / more attractive to address air quality	The developer would contribute, through a s106 agreement to improvements in cycle / pedestrian routes.
Planting should be used to offset the impacts of additional cars on air quality	Mitigation measures identified within the ES will be secured through planning conditions.
Piling may have serious structural impacts upon existing buildings resulting in cracks and subsidence	Impacts arising at the construction phase are assessed in Section 18.
Lack of information about timescales for construction	There is an indicative construction plan within the planning documents, however if granted consent the developer would have three years to implement the permission. A

	construction management plan would be secured by condition.
Construction traffic will result in noise, dust, dirt and congestion and is not adequately addressed	Conditions would be placed on the permission seeking to reduce the impact of construction.
Proposals not in keeping with Edwardian buildings in Atlas and Derrick Gardens	Design matters are assessed in Section 16.
Properties at Atlas and Derrick Gardens will be dwarfed by proposed buildings which are too close and much taller	
Lack of detail as to how the development will fit in with existing buildings	
Proposed buildings should provide a frontage onto the proposed new street in the masterplan or onto the new Neighbourhood Centre.	The development has incorporated active frontages into a number of areas across the site in order to address the public realm.
Other cities have shown that high density can be achieved at low cost while offering a high quality of life for residents	Quality of accommodation is addressed in Section 11.
Inappropriate for a decision to be made on this application until the proposed conservation area has been designated	The impact of the proposal upon the setting of the conservation area is assessed in Section 16.
Loss of buildings of historic significance within the development area and impact on adjacent historic buildings	The impact of the proposals upon the buildings within the conservation area and the locally listed buildings are assessed in Section 16.

If properties advertised overseas they will not be available to local people	This is not a material consideration.
Application has little regard for short and medium term future of existing local businesses	The buildings are designed to be compatible with the surrounding industrial uses and conditions would be secured to ensure this is the case.
Commercial activities will affect residential amenity potentially leading to the loss of businesses and jobs	
Land used for parking within Ropery Business Park is shown on plans as being landscaped but this is outside the applicant's control.	Noted, this has been removed from the plans.
The highways assessment should consider the relationship of the development and adjacent parking area.	Parking / access issues are addressed within Section 20.
Concerns that parking within the Ropery Business Park will be displaced	
Concerns about need to retain access to adjacent recording studio and the need for soundproofing	
Development should be built to Passive House standards	Sustainability issues are assessed in Section 23.
Potential conflict of interest in that Rockwell is advising on the masterplan	The planning department are not aware of this and it has not affected the consideration of the planning application.
Lack of traceability of the development company	This is not a material consideration
Planning policies and constraints for an application should be listed on the council's website.	Planning policies are available on the Council's website.
Lack of play provision for older children e.g. space for wheeled sports	Play provision is assessed in Section 12.
Impact of piling upon adjacent properties	A construction management plan would be requested

	by condition.
New entrance to development would disturb residents and put pressure on this part of Anchor and Hope Lane / the roundabout	Highways issues are addressed in Section 20.
There are only 200 parking spaces for 771 cars	
Not clear whether flats are proposed on land between Atlas and Derrick Gardens	No flats are proposed between Derrick and Atlas Gardens
Small properties will result in a transient community	Issues of housing mix are addressed in Section 13.
Transport assumptions about buses are flawed and impact on bus services is understated	Highways / transport issues are addressed in Section 20.
Impact on train services not addressed	
Impact of new retail park has not been assessed	
The S106 contribution is inadequate to cover the required infrastructure and school places.	Infrastructure is addressed in Section 30.
Affordable housing offer does not meet the council's targets	Affordable housing provision is addressed in Section 14.
Development is not carbon neutral and will result in increased traffic	Sustainability issues are addressed in Section 23.
Proposal does not provide age appropriate housing	The development provides general needs housing, there is no policy requirement to provide other types of housing on this site.
Proposed residential accommodation due to layout and design will be sensitive to noise from activities at safeguarded wharves resulting in potential for complaints	Suitable conditions would be included to ensure the development is built with sufficient noise insulation.

Inaccuracies and discrepancies in the acoustic report mean that a proper assessment cannot be made	Noise issues are addressed in Section 19.
Proposals do not consider how access to the wharves will be maintained during the construction phase	A construction management plan would be requested by condition.
Homes will not be affordable to local people	25% of the homes are designated as affordable housing.
No construction work should be allowed at weekends	A construction management plan would be requested by condition.
Lack of drawings showing development relative to existing buildings	The impact upon neighbouring occupants is addressed in Section 18.
Comments in support	
Much needed redevelopment of the area	These comments are noted.
If development increases the need for enhanced transport links / enlargement of Charlton Station this will be a benefit	

Consultation on original proposal submitted in December 2016

Summary of Comments	Officers comments
Proposal does not comply with the Charlton Riverside Masterplan	Amendments have been made to the scheme which seek to address these issues
Excessive height and density	
Proposal would not meet masterplan objectives of protecting and increasing jobs	
More light industrial spaces is needed to retain the current character of the area and local jobs	
Displacement of businesses and loss of jobs	The impact upon employment is assessed in Section 9.

Not enough Class A3, D1 and D2 facilities proposed	The amount of non-residential floorspace has been amended. Non-residential uses are discussed in Sections 9 and 15.
Overloading of public transport, health services, education and local infrastructure, provision for children	Infrastructure is assessed and details of planning contributions are provided in Section 30.
No new services are being offered e.g. schools, doctors and offices	Offices are included in the proposal and infrastructure such as schools and doctors would be delivered through CIL payments.
Impacts on light and privacy due to 26 storey tower	The 26 storey tower has been removed from the proposals
Application is premature as the masterplan is still in development	The Charlton Riverside Masterplan SPD has since been adopted
There is no justification for the proposed height	The height of buildings across the site has been revised since the original submission
The tower is out of character with the surrounding area and out of scale with surrounding buildings	
Lack of creativity in the design	
Internal amenity areas are ill-conceived with inadequate levels of sunlight	
Height of buildings is out of character with surrounding area	
The Valley House development on Woolwich Road sets a more appropriate height precedent at 7 storeys	
Proposal provides approximately one quarter of the required units on less than 10% of the regeneration area	

A landmark building should be provided of more appropriate size which protects views from the river and Charlton Village Conservation Area	
Over-provision of flats will change the nature of Charlton by pushing families out	The mix of units is assessed in Section 13.
Lack of reference to the industrial history of the site, Charlton Village or maritime nature of the site	Design and heritage is addressed in Section 16.
Scheme is not a green corridor	Details of soft landscaping would be secured by condition.
The main access should connect the new neighbourhood with the roundabout	Highways issues are discussed in Section 20.
Development is not designed to serve the local community	
Detrimental effects of overshadowing and wind conditions	Impact on the microclimate is addressed in Section 18.
Development is like a strange adjunct to Greenwich Millennium Village rather than the distinct identity planned for and needed in Charlton	Design and heritage considerations are addressed in Section 16.
Maximum height should be 8 storeys and to achieve objective of low rise family housing for all age groups	The height of the development has been amended.
Priority should be given to first time buyers / local residents	This is not a material consideration.
Units should not be sold to foreign investors and left empty	
Proposed housing is supported providing a high percentage of units are affordable	
Housing is badly needed so these plans should be welcomed with decent public transport and retail nearby	
Does not set precedent for high quality development	

Density and height based on improvements to PTAL ratings but no firm commitment to transport improvements	Infrastructure provision is addressed in Section 30.
Increased traffic will worsen already poor air quality	Air quality is addressed in Section 19.
Inadequate car parking - worsening of parking conditions on street	Parking is addressed in Section 20.
Proposals at odds with council's Strategic Partnership report of February 2016	
Children will require space to play within the proposed development	Children's play space is to be provided on site.
There is limited entertainment in the area especially for teenagers	
Lack of infrastructure for children	
Noise levels associated with new development will affect quality of life for existing residents + will impact on health	Noise issues are addressed in Section 19.
Existing drainage problems / flooding in Anchor and Hope Lane will worsen	Drainage and flooding are addressed in Section 24.
Access road insufficient to accommodate proposed bus route / increased traffic for wider area	This matter has been addressed.
Use of GRC cladding will create a grey faceless façade	Design matters are addressed in Section 16.
Lack of space between tall elements of the buildings	
Simpler landscaping and materials could reduce future maintenance costs	
Lack of proper frontage to the street	
Lack of distinction between public and private spaces	
International and modernist style does not reflect the local vernacular	
Brick should be the preferred material	
Support for provision of managed workspace	Noted

Traffic at construction stage will affect adjacent businesses.	A construction management plan would be secured by condition.
Loss of light and privacy to Atlas and Derrick Gardens	Impact on amenity is addressed in Section 18.
Living conditions for new residents will be poor due to commercial traffic and industrial activities	Quality of accommodation is addressed in Section 11.

7. Planning Context

- 7.1 This application needs to be considered in the context of a range of national, regional and local planning policies and Supplementary Planning Guidance / Documents.
- **National Planning Policy Framework (NPPF – 2012)**
 - **The London Plan (March 2016)** - Full details of relevant policies refer to appendix 3.
 - **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” – 2014)** - Full details of relevant policies refer to appendix 3.
 - Full details of relevant SPD / Documents refer to appendix 3.

8. Material Planning Considerations

- 8.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application 16/4008/F.
- Principle of Development;
 - Density
 - Quality of Living Environment Provided for Future Residents
 - Amenity Space and Children’s Play
 - Housing Mix
 - Affordable Housing
 - Non-Residential Uses
 - Design and Impact upon Heritage Assets;
 - Landscaping, Trees and Ecology;
 - Amenity;
 - Noise and Air Quality;

- Transport and Access;
- Waste Management;
- Sustainability and Energy;
- Flood Risk;
- Contamination;
- Security and Community Safety
- Community Infrastructure Levy (CIL);
- RBG CIL;
- Implications for Disadvantaged Groups.

- 8.2 The planning application has been accompanied by an Environmental Statement (ES). The ES assesses the environmental effects that are likely to arise from the development and sets out the mitigation measures proposed. A non-technical summary of the ES also accompanies the application.
- 8.3 As the application was originally submitted prior to the introduction of the Environmental Impact Assessment Regulations 2017 the application has been assessed in accordance with the 2011 Regulations.
- 8.4 Consultation on the original ES was carried out in accordance with the above Regulations. The amendments submitted in December 2017 included revised information in respect of the ES and as such further consultations were carried out and a notice published in the press in accordance with Regulation 22 of the above Regulations. It is considered that the amendments submitted in February 2018 would not affect the conclusions of the ES.
- 8.5 In relation to the environmental implications of the revisions submitted on 3 April 2018 the Council's independent assessor agrees that in most instances the revisions will not change the findings of the Environmental Assessment. However, it is recommended that internal daylight and sunlight are reviewed further given the concerns previously highlighted and noting that there were a number of daylight and sunlight transgressions in Buildings M/N and J. It is also recommended that further evidence is presented in relation to the mitigation proposed to address the impacts on the wind microclimate.
- 8.6 The comments in relation to internal daylight and sunlight are noted however this assessment did not fall within the scope of the EIA. Any changes in relation to daylight and sunlight affecting neighbouring properties are likely to improve rather than worsen as a result of the amendments to the buildings. These matters are therefore not considered to significantly change the conclusions of the Environmental Statement.

- 8.7 With regard to wind microclimate a condition is recommended requiring the wind mitigation measures outlined in the submitted wind assessment to be implemented. This condition will also secure additional testing of the revised scheme and the implementation of any further mitigation required to address the impacts.
- 8.8 The ES has been reviewed by an independent assessor and is it is considered that it provides a full account of the development proposed in the planning application and the likely significant effects on the environment including measures to mitigate any environmental effects. It is considered to contain sufficient environmental information to enable determination of the planning application.
- 8.9 Conditions are recommended to ensure that the development is carried out in accordance with the parameters assessed in the ES.

9. Principle of Development

Location for growth and principle of new housing

- 9.1 The NPPF sets out the Government's plan for growth within planning policy. It seeks to ensure that the Green Belt is protected and urban sprawl is prevented. Therefore National Planning Policy advocates the redevelopment and reuse of brownfield sites and seeks to ensure that the potential of sites to accommodate new development is optimised. Paragraph 58 encourages development to optimise the potential of sites to create and sustain an appropriate mix of uses. Paragraph 17 highlights the importance of reusing previously developed land to accommodate growth and specifically states that policy should:

“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.”

- 9.2 Policy 3.4 of the London Plan places significant emphasis on the importance of optimising housing potential of development sites to increase the supply of housing across London.
- 9.3 The London Plan (Policy 3.7) encourages proposals for large residential development including complementary non-residential uses in areas of high public transport accessibility. The Mayor's Housing SPG (Paragraph 7.5.7) states that optimising housing potential in Opportunity Area's is considered to be a strategic priority. The potential to deliver new homes and jobs to contribute to the London Plan's overall strategic housing and economic requirements should be an important consideration.

- 9.4 Policy H1 of the Core Strategy seeks to focus new housing in Strategic Development Locations. The borough's housing target for 2015-2025 is 26,850 (an average of 2,685 per year) as set out in the London Plan.
- 9.5 The site lies within the Charlton Riverside Opportunity Area as designated by the London Plan, which has an indicative employment capacity of 1,000 jobs and capacity to deliver a minimum of 3,500 new homes.
- 9.6 Charlton Riverside is also designated as a Strategic Development Location in the Core Strategy and is a key part of the spatial strategy for the borough. It is envisaged that this area will be transformed into an attractive and vibrant mixed use urban quarter providing 3,500 – 5,000 new homes with the potential to offer new community and education facilities.
- 9.7 Policy EA2 sets out the land use aspirations for the Charlton Riverside Strategic Development Location. This policy states that employment land will be consolidated to maximise the use of land whilst maintaining employment levels in the Waterfront area. It states that there will be a reduction in out of town centre retail in this area and an increase in the both the quality and quantity of open space. The policy also refers to a requirement for sufficient buffering between new development and the retained Strategic Industrial Location and safeguarded wharves.
- 9.8 The Charlton Riverside SPD 2017 (referred to hereafter as the SPD) provides guidance on the regeneration and redevelopment of the area. This document sets out the following vision for the area:

*“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.”*

- 9.9 Having regard to the above policies and designations there is general support for new mixed used development in this area. The co-location of residential developments and existing industrial operations is assessed in more detail later in this report.

Employment

- 9.10 Policy EA of the Core Strategy seeks to maximise the contribution to employment in Royal Greenwich from sites in existing or previous employment use and sets out criteria which limit the circumstances in which non-employment uses will be permitted on employment sites. However, as set out in paragraph 4.2.30, this policy does not apply to sites within Charlton Riverside and Greenwich Peninsula West Strategic Development Locations as these areas are undergoing significant change in line with their respective masterplan SPD.
- 9.11 As noted above Policy EA2 seeks to consolidate employment uses in the area. Section 5.4 of the SPD states that new development will be expected to maintain or re-provide equivalent employment floorspace within B1 and B2 Use Classes and significantly increase job densities within B Use Classes.
- 9.12 The SPD states that existing creative industries will be retained and development proposals will be required to show whether additional suitable space might be provided for creative industries within the development. Managed workspace and accommodation suitable for start-up enterprises and SMEs will be actively pursued in any development proposals. Developers will be required to provide detailed plans for the development, marketing and management of the commercial element of mixed-use schemes as part of the planning application process.
- 9.13 The SPD states that proposals will also be considered against the following criteria:
- Proximity of incompatible uses to the existing and proposed use;
 - The potential reuse of buildings of value for employment;
 - Re-location strategies showing how existing businesses can be suitably accommodated;
 - Viability appraisal demonstrating suitability of maintaining or re-providing industrial or employment uses within the location;
 - Marketing strategies for two immediately preceding years showing attempts to market the property for employment uses; and the establishment of standard planning conditions requiring the disposal of the commercial element prior to the release of the [residential] element of a scheme;

- Other overriding factors potentially inhibiting the continuation of employment use, and
- Proof that relocating businesses can afford the new rents in their new locations.

- 9.14 The site comprises 6,341sqm of floorspace, together with external storage areas and parking. The industrial estate is currently occupied by over 20 separate businesses engaged in a range of commercial activities which include storage and distribution, vehicle repair / MOT testing; vehicle spraying, manufacturing; vehicle hire and the supply of scaffolding.
- 9.15 At total of 3,236sqm of commercial floorspace is proposed in the new development, within Plot B. This is described in the application as 'flexible commercial' floorspace for uses within Classes B1, A1, A2 and A3. However, it is considered that the amount of floorspace for uses outside Class B1 should be restricted in order to maximise the employment potential of the development. The applicant has agreed to a condition restricting the amount of A Class floorspace to 150sqm in order to ensure that the floorspace caters primarily for Class B1 users. Further details of the proposed commercial floorspace are set out in Section 15.
- 9.16 The applicant has stated that there number of people currently employed at the site amounts to 90 full time jobs. The exact breakdown of floorspace by use class within each of the existing buildings has not been provided. However, the existing employment density has been estimated based on a 50/50 split between B2 and B8 uses. This indicates that the site as a whole could potentially generate a total of 121 jobs. An assessment based on 100% B2 floorspace indicates that the existing site could provide 178 jobs.
- 9.17 An employment calculation has been carried out for the commercial floorspace in the proposed development based on the Homes & Communities Agency's Employment Density Guide. (Note this is based on the amount of floorspace prior to the recent amendments to Plot B). The results of this are set out in the table below:

Employment Use	Area	Number of FTE Jobs
B1 Office (Corporate)	2,623m ² NIA	202
A1/A3 Retail/Restaurants & Cafes	128m ² NIA	8-10
Total		209-212

- 9.18 This indicates that the proposed development could potentially provide 88 - 91 more jobs than the potential employment capacity of the existing floorspace. Whilst the proposed development would not re-provide an equivalent amount of employment generating floorspace to the existing floorspace on site the scheme would increase the overall employment density at the site.
- 9.19 It is noted that the redevelopment of the site will result in the displacement of existing businesses and it is not yet known whether any of the existing businesses on the site would move into the accommodation provided in the proposed development. The applicant has proposed to provide assistance to existing businesses in relocating by engaging a local agent to provide advice and assist businesses in finding alternative premises. In addition, further details will be required in relation to the affordability of rents for businesses relocating to new premises. A business re-location strategy which includes the above provisions will be secured by means of a S106 clause.
- 9.20 It is proposed to fit out the commercial units to shell and core. A S106 clause is recommended requiring a marketing strategy to be submitted which sets out how the units will be marketed and what steps will be taken to maximise the chances of finding a suitable tenant. The recommended S106 clauses also include requirements in relation to the provision of affordable workspace.
- 9.21 In view of the above assessment it is considered that the proposals are acceptable in terms of employment generation.
- 9.22 The SPD seeks to create a new neighbourhood centre, focused on the southern stretch of Anchor and Hope Lane to provide a mix of retail, food and drink, commercial leisure and community provision, as well as some employment space that provides for the day-to-day needs of residents, employees and visitors to Charlton Riverside. However, this area has not been formally designated as a neighbourhood centre and proposals for retail development should therefore be assessed against the policies of the Core Strategy. As the site lies outside of any area formally designated as a preferred location for retail it is considered that any provision within the proposed scheme should be limited to small scale convenience retail to serve the needs of residents and workers on site or in the immediate vicinity.
- 9.23 As set out above the applicant has agreed to limit the amount of proposed A Class uses in Plot B to no more than 150sqm and this is considered to be acceptable. Further assessment in relation to these uses is included in Section 15.

Community Uses

- 9.24 Policy CHI supports the development of new and improved community facilities where there are identified local needs and where the development is in line with the Royal Borough's strategy for the provision of services and the Infrastructure Delivery Plan. The policy also requires the provision of a Community Development Strategy for developments over 50 dwellings to encourage the successful integration of tenures in new developments.
- 9.25 It is proposed to provide 833sqm of flexible community space comprising uses within Classes D1, D2 and ancillary C3 within Plot A. In principle this provision is considered to meet the requirements of policy CHI. Further detailed assessment in relation to the proposed community spaces is set out in Section 15.
- 9.26 Having regard to the above assessment it is considered that the proposals meet the requirements of the relevant policies and that the principle of the development is acceptable.

10. Density

- 10.1 Paragraph 4.1.39 of the Core Strategy states that 'when considering proposals for housing developments, the Council will give priority to securing a high quality environment for residents and making the best sustainable use of land, having regard to the location of the site, to the individual characteristics of the site and the character of the surrounding area. The Council will utilise the London Plan Policy 3.4 to guide rates for housing density in applying local context to the settings defined in the London Plan'.
- 10.2 Policy 3.4 of the London Plan seeks to ensure that the housing potential of sites are optimised and states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 Density Ranges. Table 3.2 takes into account location, existing building form, massing and Public Transport Accessibility (PTAL). The PTAL rating is used as a means of quantifying and comparing the accessibility of public transport for a site.
- 10.3 The majority of the site currently has a PTAL of 4 whilst the eastern part has a PTAL of 3. In view of the site's location and PTAL it is considered that it falls within an 'Urban' setting. The recommended density range for such locations is 200 - 450 habitable rooms per hectare for a PTAL of 2 - 3 or 200 - 700 habitable rooms per hectare for a PTAL of 4 - 5. In terms of units per hectare this equates to 45 - 170 for the lower PTAL and 45 - 260 for higher the PTAL. The SPD suggests an average density across the Charlton Riverside area of 146 units per hectare. The SPD sets out indicative densities

for different areas within the Masterplan. Plot A of the site lies within an area with an indicative density of 201-250 units per hectare whereas Plot B has a higher indicative density of 251- 300 units per hectare.

- 10.4 The overall density across the site calculated on the basis of the site area divided by the number of units is 304.74 units per hectare. The net density taking into consideration the proportion of non-residential floorspace is 325 units per hectare or 887 habitable rooms per hectare. Plot A has a density of 254 dwellings per hectare and Plot B 407 units per hectare. The density on Plot A is therefore just over the density recommended in the SPD. The density on Plot B exceeds both of the recommended ranges.
- 10.5 Whilst the overall density is above that recommended in the London Plan and the plot densities are higher than those recommended in the SPD it is considered that higher densities can be supported in this location in order to bring forward the redevelopment of the site and the regeneration of the area. Furthermore, density is just one factor to be considered in the assessment of an application and regard should be had to factors such as design, local character and impacts upon amenity. These matters are assessed in detail elsewhere in this report and having regard to this assessment the proposed density is considered to be acceptable.

11. Quality of Living Environment Provided for Future Residents

- 11.1 Core Strategy Policy H5 seeks to ensure an adequate standard of accommodation to ensure satisfactory levels of residential amenity and quality of life for future occupiers.
- 11.2 The Technical Housing Standards – Nationally Described Space Standards (2015) set out minimum space standards for units of different sizes:

Flat Type	Nationally Described Space Standards Minimum floor area single level unit (duplex units)
Studio	37 m ² (with shower room) 39 m ² (with bathroom)
One Bedroom, two people	50m ² (58m ²)
Two bedroom, three people	61m ² (70m ²)
Two bedroom, four people	70m ² (79m ²)
Three bedroom, four people	74 (84m ²)

Three bedroom, five people	86m ² (93m ²)
Three bedroom, six people	95m ² (102m ²)
Four bedroom, five people	90m ² (97m ²)
Four bedroom, six people	99m ² (106m ²)
Four bedroom, eight people	117m ² (124m ²)

- 11.3 A review of the submitted plans indicated that a number of the proposed units fell below the required size standard. Amended plans have been submitted showing revised internal layouts in order to address this and the unit sizes are now considered acceptable.
- 11.4 The London Housing SPG states that a minimum ceiling height of 2.5 metres for at least 75% of the gross internal area is strongly encouraged. The submitted plans indicate that this can be achieved.
- 11.5 The London Housing SPG states that developments should minimise the number of single aspect dwellings. For the purposes of the London Housing SPD 'north facing' is defined as an orientation less than 45 degrees either side of due north. It also states that single aspect dwellings that are north facing, exposed to significant noise levels or containing three or more bedrooms should be avoided. Policy H5 of the Core Strategy includes a presumption against single aspect north facing units and a presumption in favour of dual aspect units where possible.
- 11.6 Most of the units within the scheme meet the above requirements however a small proportion of units (21 in total or 2.72%) are single aspect with north facing windows. These units comprise 7 one bedroom units within Building A, 8 one bedroom units in Building O and 6 two bedroom units within Building J. Whilst single aspect north facing units are not ideal it is noted that none of the affected units are three or more bedroom units. The small number of north facing single aspect units is considered to be acceptable in the context of the wider scheme.
- 11.7 An assessment has been carried out of the daylight levels within the proposed units. This shows that with the latest revisions 80% of the units on the ground and first floors of the buildings would meet the BRE standard for daylight (1.5% ADF for LKD and 1% ADF for bedrooms.) The assessment focusses on the lower floors which are considered to be the worst case as the floors above are likely to receive better levels of daylight. The internal daylight assessment has been reviewed by an independent assessor who

agrees that the unit on the higher levels would generally be better lit but notes that it is not possible to see how far up the buildings the poor light conditions will extend and that they could extend upwards over a number of floors.

- 11.8 The number of units meeting the internal daylight standards in the revised scheme has reduced when compared with the earlier version of the scheme which was submitted in December 2017. The percentage meeting the standard in the earlier scheme was 86% compared with 80% in the revised scheme. The reductions are mainly concentrated within Plot A, particularly the east facing bedrooms in Building H where 7 additional rooms fall below the standard. In Buildings A and C there would be 2 additional rooms which fall below the standard and 4 additional rooms in Building B. It should be noted however that 2 additional rooms in Building E would meet the standard when compared with the earlier version of the scheme. These changes can be largely attributed to the revisions to the massing within Plot A.
- 11.9 Of the rooms in the sample, 67 out of 343 do not meet the minimum ADF recommendations: 30 living/kitchen/dining rooms and 37 bedrooms. It is noted that of the 30 living/ kitchen/dining rooms which do not meet the standard, 21 will have a value lower than 1% whilst the rest will have values ranging from 1.1% to 1.3%. Of the 37 bedrooms that will not meet the 1% ADF recommendation, 18 will have a value of 0.5% or less (i.e. half the guideline or below) and 19 will have a value between 0.6% and 0.9% ADF.
- 11.10 The units where living / kitchen/ dining rooms ADF levels do not meet the standard are located in Buildings D and E/F in Plot A, and the inward facing units around the courtyard in Plot B. The bedrooms with ADF levels which do not meet the standard are located predominantly within Plot A with a smaller number within Plot B.
- 11.11 With regard to sunlight the results of the assessment show that 40 of the rooms tested would meet the BRE guidelines. This represents a reduction from 46% compared with the scheme submitted in December 2017. The independent assessor's review of the sunlight results indicates that there will also be relatively a high number of living / dining / kitchens with poor daylight conditions where sunlight levels are also quite poor, although it is acknowledged that the orientation of the site on a north-south axis is challenging.

- 11.12 In some cases the reduced levels of daylight can be accounted for by deep floor plans (particularly in the case of living / kitchen / dining rooms) or overhanging balconies and there is often a trade-off in high density schemes between providing external private amenity space and meeting the BRE guidelines for internal daylight. In other cases reductions in daylight can be attributed to amendments to window positions and the provision of inset balconies in order to improve privacy within units. In addition, the increased height of Buildings C, E and F has clearly contributed to the reductions in internal daylight in some parts of the development however this increase in height has allowed reductions in the height in Building H (in order to reduce the impact upon neighbouring properties) without reducing the overall level of affordable housing provision. Whilst levels of daylight and sunlight in some units will be less than ideal and do fail against the BRE guidelines, the levels achieved are not uncommon in an urban environment such as these and overall across the development as a whole the standard of amenity is acceptable.
- 11.13 A review of overshadowing to the communal open spaces within the proposed development was carried out for the scheme submitted in December 2017. This showed that all but one of the amenity areas tested would receive two or more hours of sunlight across more than 50% of their area on 21 March or see a reduction of no more than 20% from baseline levels with the proposed development in place. The amenity area which did not meet the standard is located adjacent to Building A and this would receive two or more hours of sunlight across only 10.7% of its area.
- 11.14 Testing carried out in relation to the revised scheme shows that one additional amenity area would now fall below the standard. This is the amenity area adjacent to the proposed crèche which would experience a reduction in the sunlit area from 53.9% to 44.2% as a result of the amendments to the scheme.
- 11.15 Whilst there would be two amenity areas which would receive lower levels of sunlight it is noted that all of the other amenity areas within the scheme would receive good levels of sunlight. Overall it is considered that the proposed amenity spaces would provide an acceptable standard of amenity for future residents.
- 11.16 A number of amendments to the scheme have been made in order to address overlooking between the proposed units. This includes the repositioning of windows, replacement of projecting balconies with inset balconies in some cases and the provision of privacy screens to terraces and balconies. It is considered that with these amendments the proposal would provide

satisfactory levels of privacy for future occupants.

- 11.17 Policy H5 of the Core Strategy requires 10% of the dwellings be built to full wheelchair standards, or be easily adaptable for users who are wheelchair users. Policy 3.8 of the London Plan requires that 90% of units meet Building Regulations requirement M4 (2) 'accessible and adaptable dwellings' and 10% of new housing must meet Building Regulations requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
- 11.18 The submitted Design and Access Statement states that 10% of the units have been designed as wheelchair adaptable layouts and example layouts have been provided. The Council's Occupational Therapist has requested further information regarding the location of the proposed accessible units and the category of accessibility proposed for each unit. Conditions are recommended to secure the required number of accessible and adaptable units in accordance with the policy requirements.
- 11.19 As set out in the London Housing SPG each wheelchair accessible unit should have a designated car parking space. In this case 51 Blue Badge spaces are to be provided within the basement areas of each Plot. This level of provision is considered acceptable.
- 11.20 Having regard to the above assessment and subject to the receipt of further amended plans in relation to accessible units it is considered that the scheme, as amended, would provide an acceptable standard of amenity for future occupants.

12. Amenity Space, Public Open Space and Children's Play

- 12.1 Standard 4.10.1 of the Mayor's Housing SPG states that 'a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant'. Policy H5 of the Core Strategy states that in flats a good-sized balcony, a terrace or enclosed communal gardens should be provided and family housing should normally have direct access to a private garden.
- 12.2 All of the proposed units would include a private external amenity space in the form of a balcony, loggia, terrace or in the case of some of the duplex units within Plot A, a private garden. It is noted that some of the proposed external spaces are slightly undersized when compared with the standard, however given the good level of communal amenity space within the development the provision for private amenity spaces is considered to be

acceptable overall.

- 12.3 It is proposed to provide a total of 11,041sqm of external amenity space (excluding private gardens) for use by residents of the development. This will include:
- 1,922sqm public spine area Plot A
 - 2,769sqm family centre area Plot A
 - 3,140sqm of public realm Plot B,
 - 1,220sqm of communal podium space Plot B
 - 1,990sqm of communal roof terraces for residents across Plots A and B
- This level of provision is considered to be satisfactory.
- 12.4 The site lies within an Area of Open Space Deficiency in respect of Local Parks. Core Strategy Policy OS (c) seeks to increase the provision of public open space and improve public access in areas of open space deficiency and states that new residential schemes of over 50 units in deficiency areas will be required to incorporate public open space provision.
- 12.5 The publicly accessible open spaces within the site include sitting out areas, children's play areas and nature conservation areas. It is considered that this provision would fall within the Local Parks and Open Spaces categorisation contained in Table 7.2 of the London Plan. Accordingly it is considered that this would contribute to local open space provision which would assist in addressing the deficiency. Overall it is considered that the proposals would result in a net increase in public open space in the local area as well as improving the permeability of the site and improving public access to open space.
- 12.6 Policy 3.6 of the London Plan requires that new housing development ensure that children have access to good quality, well designed, secure and stimulating play opportunities. Policy H(e) of the Core Strategy requires that in residential developments that include over 50 units of family housing, suitably equipped and well-designed children's play areas are required for different age groups. The required level of provision is calculated using the methodology set out in the Mayor of London's Play and Informal Recreation SPG.
- 12.7 The Mayor's Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation SPG recommends 10sqm of play space per child. The GLA divide the requirements of children's play space into three categories. Space for the under 5s, described as doorstep play and generally considered as part of the plot; space for ages 5-11 and children 12 plus. The required amount of play space as set out in the SPG would be 100sqm for children

under 5 years, 660sqm for children of 5-11 years old and 400sqm for children of 12 years or older which is a total of 2,060sqm.

- 12.8 The table below shows the proposed amounts of play space for each age category compared with the standard:

Age Group	Required Playspace	Proposed Playspace
0 - 5 years	1,000sqm	1,332sqm
6 - 11 years	660sqm	907sqm
12 years +	400sqm	558sqm
Total	2,060sqm	2,979sqm

- 12.9 The proposed amount of play space exceeds the recommended amounts for each age category and the total amount of play space across the development exceeds the recommended amount by 919sqm or 44.6%.
- 12.10 The proposed play areas would provide a range of play facilities for different age categories distributed across the two plots. The play areas would be located within the Eco Walk, Public Spine and Community Centre areas as well as the roof gardens of Plot A. Within Plot B the play areas would be located within the Podium Garden and ground floor adjacent to the workspaces. The proposed play space would be designed around a number of themes including nautical play, active play and sculptural play for a range of age groups. Provision for the 12+ age group would comprise table tennis facilities as well as active play equipment to encourage physical activity.
- 12.11 The proposed level of play provision is considered to be generous and contributes positively to the overall quality of the scheme. .. A condition is recommended to ensure that the amount of play space provided is in accordance with the details set out above and to secure the provision of detailed layouts and details of equipment to be provided in the proposed play areas.

13. Housing Mix

- 13.1 London Plan Policy 3.8 encourages a full range of housing choice. Policy H2 of the Core Strategy requires a mix of housing types and sizes in all developments which should contain a proportion of 3, 4 and 4+ bedroom units. The exact mix on each site will vary according to the location of the development and the character of the surrounding area and will be affected by factors such as inter alia: the level of accessibility to public transport or where there is a poor external environment.

13.2 Section 6.1 of the SPD states that “...The housing delivered at Charlton Riverside will focus on the delivery of family housing and a significant proportion of affordable housing in keeping with the targets set out in the Core Strategy and the London Plan...”

13.3 The current application proposes the following housing mix:

Unit type / size	Total (%)
Studio	148 (19)
1-bed	193 (25)
2-bed	304 (39)
3-bed	121 (16)
4-bed	5 (1)
Total	771

13.4 It is noted that just 17% of the total number of units proposed housing would comprise three or four bedroom units.

13.5 The applicant has stated that the number of family sized units has been maximised. It is noted that increasing the proportion of family sized units is likely to affect the total number of units which can be delivered on the site and proportionally the larger units generate a lower revenue than smaller ones which would in turn affect viability of the scheme. The provision of family sized units has been focussed within the affordable element of the scheme and 23% of the affordable provision would comprise three or four bedroom units.

14. Affordable Housing

14.1 Policies 3.11 and 3.12 of the London Plan seek to maximise affordable housing provision over the term of the London Plan and when negotiating on individual private residential schemes. Policy 3.12 also states that negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy and provisions for reappraising the viability of schemes prior to implementation.

14.2 Policy H3 of the Core Strategy requires a minimum of 35% affordable housing. The precise percentage, distribution and type will be determined by the particular circumstances and characteristics of the site and of the

development, including financial viability. The affordable housing that is provided should be provided as 70% social / affordable rented and 30% intermediate housing.

14.3 It is proposed to provide a total of 193 affordable units which equates to 25% of the total number of units. The affordable units would comprise 137 social rented units and 56 intermediate units. The proposed affordable rented units would be located in Buildings A and B on Plot A and the intermediate units would be located in Building K on Plot B.

14.4 The proposal would provide the following mix of affordable housing units:

Unit size	Social Rented	Intermediate	% of affordable
Studio	3	15	
1 Bed	41	17	
Total 1 Bed	44	32	39
2 Bed flats	35	24	
2 Bed duplex	13	0	
Total 2 Bed	48	24	37
3 Bed flats	42	0	
3 Bed duplex	2	0	
Total 3Bed	44	0	22
4 Bed flats	0	0	
4 Bed duplex	1	0	
Total 4 Bed	1	0	1
Total	137	56	100

14.5 The proposed mix of units comprises 71% social rented units and this is considered to be in accordance with the above policy.

14.6 The overall proportion of affordable units is less than 35% and therefore it is necessary to demonstrate through a viability appraisal that the proposal represents the maximum amount which can be delivered on the site. The applicant has submitted a viability appraisal and this has been reviewed by an independent assessor.

- 14.7 The viability appraisal submitted with the December 2017 amendments indicated that the scheme would only viably support the provision of 5% affordable housing, however the applicant indicated at that stage that 21.5% would be provided. Further analysis has been carried out by the applicant which examines the potential for growth in sales values over the delivery period of the proposed scheme. This analysis indicates that with the estimated growth in sales values the scheme could deliver 25% affordable housing whilst maintaining a profit of 18%. Below is a summary of the main inputs used in the viability assessment:

Assumed Profit Level	Average Sales Value	Construction Costs
18%	£700.35 per sq. ft. (based on forecasted 15% growth scenario)	£182.08m (growth scenario assumes costs remain the same as in original appraisal)

- 14.8 The independent assessor has reviewed the viability appraisal and the analysis of the growth scenario. The assessor's report confirms that the scheme generates a profit of 17.2% with 25% affordable housing which falls below the Applicant's target profit of 18%. It is noted that usually when revenue growth is applied to an appraisal, cost inflation should also be reflected within the scheme as well which would reduce the impact of applying the growth totalling 17%. On the basis that cost inflation is adopted the scheme would not be in a position to support more than 25% affordable housing as the deficit would increase.
- 14.9 The assessor also states that whilst the scheme may or may not achieve 17% growth, it may also achieve more than 17% and as a result the Council should secure a review mechanism in the S106 in order to benefit from any potential increases to the sales values which may correlate to more onsite affordable housing.
- 14.10 In light of the above comments the proposed level of affordable housing is considered acceptable. In view of the fact that the proposal does not provide a policy compliant level of affordable housing it is recommended that a review mechanism is included in the S106 agreement. In accordance with the advice set out in the Mayor's SPG the review mechanism will comprise an early review of viability if the development is not commenced within 2 years of permission being granted and a late stage review following the sale of 75% of the market units within the development.

15. Non-Residential Uses

15.1 As noted in Section 9 above the Charlton Riverside Masterplan SPD seeks to maximise employment generating uses in new developments. It is proposed to provide 3,236sqm of flexible space within the ground floor and part of the first floor of the buildings in Plot B. However, as set out in Section 9 a condition will be imposed to limit the amount of floorspace which can be used for purposes other than B1 use. This area of floorspace would be located in Building O as shown on the revised floor plans for Plot B. This means that whilst there will be scope to include a small element of retail or other uses such as a cafe the primary use of the flexible space would be B1.

15.2 Section 5.4 of the SPD states that managed workspace and accommodation suitable for start-up enterprises and SMEs will be actively pursued in any development proposals. It states that:

In order to ensure the long term sustainability of the site and its businesses, proposals for development should reflect demand patterns in terms of size and feasible rent levels. Developers will be required to provide detailed plans for the development, marketing and management of the commercial element of mixed-use schemes as part of the planning application process, in line with Core Strategy Policy E(a)

15.3 The proposed B1 space would be designed to provide a workspace hub for third sector and start up organisations. The ground floor of the building has a large open plan floorplate which can be subdivided to meet the needs of different tenants. The applicant plans to engage a workspace provider to manage the accommodation. The engagement of a workspace provider, as well as a marketing plan and requirements in relation to the terms upon which the workspace will be offered will be secured by a S106 clause.

15.4 The information submitted in support of the application states that the applicant is willing to engage with local educational establishments to foster links between employers and education. Details of a scheme to achieve this objective will be secured through a S106 clause.

15.5 Within Plot A there are two spaces set aside for 'flexible community use' within Classes D1, D2 or ancillary C3. These uses might include a crèche or community meeting space, leisure facilities such as a gym or ancillary facilities for residents of the development. These are located in the ground and first floor of Building B and the ground floor of Building C.

- 15.6 The submitted information indicates that the space within Building B is to be used as a crèche. However, the applicant has since confirmed that this is not a firm proposal and that the final use of the space will be subject to demand by end users. The specific use of the space within Building C has also not been determined. However, the range of uses falling within the definition of flexible community floorspace is set out in the application and it is considered that the impacts of these uses can be controlled satisfactorily through conditions as set out below. A condition is recommended requiring that a minimum of 337sqm (GIA) (equivalent to the floor area of the 'community space' in Building B) is secured for DI use in order to ensure that a significant proportion of the space is used for community uses rather than leisure or ancillary residential use. A further condition is recommended to secure a Community Development Strategy and Community Use Plan for the flexible community space. The Community Development Strategy would set out how the development seeks to facilitate a sense of community within the new development across all tenures, through the implementation of management arrangements and the Community Use Plan would cover such matters as community access, hours of operation and security.
- 15.7 Should the space within Building B be used as a crèche it will be necessary to ensure that a satisfactory environment is provided for this use. It is noted that concerns have been raised by the Air Quality officer regarding the suitability of existing site conditions for young children who are more sensitive to poor air quality than adults. Further air quality monitoring over an extended period of time would need to be carried out to be certain that levels of air pollution are within an acceptable tolerance for this use. A condition is therefore recommended stating that no use as a crèche shall commence until this monitoring has been carried out.
- 15.8 It is noted that no specific parking provision would be made for the proposed community uses or provision for drop off or pick up of children associated with the potential use as a crèche. The applicant has stated that drop off and pick up by car would be discouraged and it is envisaged such a facility could meet the needs of residents of the new development without the need for direct vehicle access. Such arrangements would support sustainable travel objectives however further detail is required to demonstrate how this would work in practice. A condition is therefore recommended to secure details of access arrangements for the proposed DI use as well as specific reference this use in the Travel Plan.
- 15.9 A crèche would also require an area of external playspace. The submitted layout shows an area of open space adjacent to Building B which could be used for this purpose. A condition is recommended to secure further details

of the layout and means of enclosure for this space should it be used in conjunction with a crèche.

- 15.10 It is also proposed to provide 17sqm of floorspace within Plot B for use by the Metropolitan Police for Police officer welfare facilities. This space is located on the ground floor of Building M adjacent to the concierge's office. Policing and community safety facilities are included in the list of community facilities in the supporting text to Core Strategy policy CH1. A need for this facility has been identified by the Metropolitan Police and therefore the provision of such space within the development is supported. This will be secured by a S106 clause.
- 15.11 Whilst it is considered that a range of community uses within Class D1 could be permitted, a condition is recommended to preclude use as a place of worship in order to limit the impacts upon traffic generation and parking as well as residential amenity.
- 15.12 With regard to the potential amenity impacts arising from the proposed non-residential units a condition will also be imposed requiring the submission of details in relation to extraction and ventilation equipment associated with any Class A3 use to ensure that this does not have an adverse impact upon the appearance of the building and to ensure that noise and odours are properly managed. Conditions are recommended in relation to hours of operation for the commercial uses and soundproofing between these spaces and the residential units, in order to ensure that there are no adverse effects upon amenity.
- 15.13 It is also proposed to remove the permitted development rights that would normally enable a change of use of A and B Class units to residential use to ensure that the scheme continues to provide a mix of uses and employment opportunities.
- 15.14 Having regard to the above assessment it is considered that, subject to the conditions outlined above, the non-residential uses proposed within the development would meet the relevant policy requirements and are acceptable.

16. Design and Impact upon Heritage Assets

Design

- 16.1 The National Planning Policy Framework seeks, in summary and in reference to this report, to promote sustainable development through economic growth, promote good quality living through design and sustainable environments, and conserve and enhance the historic environment.

- 16.2 Paragraph 63, with regard to requiring good design, states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.
- 16.3 Policy 7.6 Architecture of the London Plan states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 16.4 Core Strategy Policy DHI sets out the general principles that the Council will promote in order to achieve a high quality of design. In particular, all developments are expected to provide a positive relationship between the proposed and existing urban context and promote local distinctiveness by providing a site specific design solution.
- 16.5 The Charlton Riverside Masterplan SPD contains guidance on the design of development within the masterplan area. The SPD defines seven distinct character areas within the Charlton Riverside Area.
- 16.6 Plot A lies within the Charlton Parks character area whilst Plot B lies within the Neighbourhood Centre character area. The SPD sets out high level design and development principles for each of the character areas:

Charlton Parks

This area is very much characterised by its relationship with key open space, particularly the new, enhanced Charlton Riverside Park. The interface between built form, mostly medium rise apartment blocks, and larger areas of open space will heavily influence the quality and sense of place. In addition, this space will act as a link between the Village East and Riverside character areas. In terms of built form, it will share some of the qualities of both the adjoining areas, with a gradient from a more intimate character (and a clearer delineation between public and private space) towards a more open urban grain and a greater mix of public and semi-private space towards the River Thames.

Neighbourhood Centre:

The central area focused on the Neighbourhood Centre lends itself to the notion of a distinct character area. This is the location for most of the key commercial activities, including retail and leisure, which will serve the day-to-day needs of residents of Charlton Riverside and the communities close by. This area can be characterised as being more civic, both in terms of the built form and the public realm. It will also have the potential for taller buildings, potentially up to 10 storeys, with commercial, retail, leisure and community

uses on the lower floors and residential above. The Neighbourhood Centre will also be a transport and movement hub, with a confluence of bus, cycle and pedestrian routes and connections to the south, towards Charlton Station, and to the north, towards a new Clipper Pier.

- 16.7 Section 6.3 of the SPD provides guidance on the scale and massing of development within the Charlton Riverside Masterplan area. It states that “low-to-medium rise, high density development is the preferred model for Charlton Riverside”. It goes on to state 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 also notes 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.”

Scale and massing of the proposed development

- 16.8 The proposed buildings on Plot A range from two to ten storeys in height. The buildings within this plot are arranged in linear blocks with a north/ south alignment. The spaces between the buildings provide internal access routes and amenity space. The buildings generally increase in height across the site from west to east.
- 16.9 Amended plans have been submitted which include a reduction in the height of Building H on the western side of the site adjacent to the two storey residential properties in Atlas Gardens. This block was previously composed primarily of five / six storey elements stepping down to three / four storeys in the centre. This has been reduced to a consistent height of three storeys across the whole of the block with a fourth storey set back. Block G which is situated adjacent to Derrick Gardens which includes elements ranging from two to six storeys remains the same height as previously proposed.
- 16.10 In order to compensate for the loss of units in Building H an additional storey has been added to Buildings C and E/F. Building C has increased to ten storeys whilst Building E/F retains its stepped form with heights of seven, eight and nine storeys. The tallest buildings would be situated on the eastern side of the site where neighbouring sites are characterised by industrial buildings.
- 16.11 On Plot B the buildings are arranged around a central courtyard with the majority of the buildings set upon a ground floor plinth providing a podium level garden. Building O at the south west corner of the plot is a standalone building which rises directly from ground level and is separate from the plinth.

- 16.12 The buildings on Plot B have a maximum height of ten storeys in the part fronting Anchor and Hope Lane and for the most part in the section which adjoins the western boundary. Building O has deeper floor to ceiling heights resulting in a greater overall height which distinguishes this standalone building from other buildings in Plot B. Building J at the north western corner of Plot B steps down to seven storeys to provide a transition between the ten storey buildings on Plot B and the smaller scale buildings in the western part of Plot A.
- 16.13 It is noted that the heights of some of the buildings in Plot A exceed the building heights set out in the SPD (the SPD indicates heights of up to 5 storeys in this location). Whilst the SPD recommends a range of building heights for different areas these are indicative and a detailed assessment of the proposals needs to be carried out with regard to the local context and design approach for the site.
- 16.14 The scheme as amended by the revisions submitted in February 2018 have sought to reduce the height of development in the western part of Plot A in order to respond to the local townscape and to address concerns in relation to the amenity of neighbouring properties. It is considered that this part of the scheme now provides a more appropriate scale of development which respects the adjacent two storey properties and provides a more gradual transition in height across Plot A. The buildings in the eastern part of the site would range from seven to ten storeys and it is considered that some taller buildings can be supported in this location as it is further away from the conservation area and the low rise two storey dwellings of Derrick and Atlas Gardens and is therefore less sensitive in townscape terms.
- 16.15 The proposed buildings on Plot B are considered to be in line with the scale of development envisaged in the SPD noting the specific reference to taller building heights in the southern part of Anchor and Hope Lane. The proposed built form and mix of commercial and residential uses is also considered to contribute to the 'civic' character identified for the Neighbourhood Centre. Whilst it is noted that there would be a significant increase in height from the two storey buildings at 1-8 Anchor and Hope Lane and Atlas Gardens the proposed scale of development is considered appropriate to mark the entrance to the development and the wider Charlton Riverside area.
- 16.16 An assessment of the impact of the proposed development upon views from the surrounding area has been carried out by the applicant. This notes that Building O would be the most visible part of the development and would form a point of visual interest in views from the south and west. It would act as focal point in such views and as a marker for the development. In long range

views from the northern side of the River Thames and Greenwich Peninsula the development would be seen in the distance as a new form of development of minor to moderate significance and would be seen as a minor addition where visible in most long range views from other directions. The assessment concludes that the proposed new development would enhance shorter range views when compared with existing baseline conditions.

- 16.17 It is noted that when the application was first submitted the scheme included blocks within Plot A of up to 16 storeys and a 28 storey tower on Plot B. The current scheme is characterised by a maximum height of 10 storeys which better reflects the aspirations of the masterplan and further reductions in height have been secured in Plot A to respect the more sensitive elements of the existing townscape. Whilst the density of the scheme and the height of some of the buildings would exceed the recommended heights set out in the SPD it is considered that the scheme would represent a significant improvement to the townscape when compared with that of the existing industrial estate.

Assessment against tall buildings policy

- 16.18 Core Strategy Policy DH2 states that tall buildings may be appropriate in Greenwich Peninsula, Greenwich Peninsula West, East Creekside, Charlton Riverside, Tamesis Point in Thamesmead, Thamesmead Town Centre, the area directly surrounding Abbey Wood train station, and 'the Hub' area surrounding Kidbrooke station. All other parts of Royal Greenwich are inappropriate for tall buildings. Paragraph 4.4.16 of the Core Strategy defines a tall building as any building '... which is noticeably taller than its surroundings, has a significant impact on the skyline or is larger than the threshold size set for referral to the Mayor'.
- 16.19 London Plan policy 7.7 sets out a number of criteria against which proposals for large and tall buildings should be assessed. The Policy states that such buildings should generally be limited to certain areas including opportunity areas and that they should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall building. Policy 2.13 of the London Plan states that development proposals within Opportunity Areas should (amongst other objectives) 'seek to optimise residential and non residential output and densities...' and 'contribute towards meeting (or exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity'

- 16.20 An assessment against the above policies in relation to tall buildings is considered necessary as the proposed development is above the height threshold for referral to the mayor of London and is considered to be noticeably taller than its surroundings. It is noted that residential properties located immediately adjacent to the site are two storeys in height and whilst there are a number of larger industrial buildings within and adjacent to the site parts of the proposed development would represent a significant increase in scale when compared with these buildings.
- 16.21 Being within Charlton Riverside, which is designated as an opportunity area, the site may be considered suitable for tall buildings providing that other assessment criteria are met. Having regard to the above assessment of the scale and massing of the proposed development and its effects upon the townscape, together with the detailed assessment elsewhere in this report it is considered that the requirements of London Plan policy 7.7 are broadly met.

Detailed design

- 16.22 Five distinct façade treatments would be used throughout the scheme:
- Brick grid;
 - Brick grid with Glass Reinforced Concrete (GRC);
 - Brick bands with GRC;
 - GRC;
 - Artificial stone.
- 16.23 The brick grid type would be used on Buildings G and H in Plot A, adjacent to the houses in Derrick and Atlas Gardens. The brick grid would be formed by traditional bricks in a combination of lighter and darker tones. The openings within the grid would be broken down with metal panels and full height windows.
- 16.24 The brick grid with GRC type would be used on Buildings A, B and C in Plot A and the outward facing elevations of buildings K/L and M/N in Plot B. The façade treatment would use a combination of brick and GRC to form the framework for the elevation. Windows would be recessed behind the line of the brick cladding to add further texture and shadow definition.
- 16.25 The brick bands approach would be used throughout the facades of Buildings D and E/F in Plot A. The facades would feature horizontal bands formed by a combination of full height vertical brick panels, GRC panels and full height windows.

- 16.26 The GRC façade treatment would be used only on Building O in Plot B. The elevations would comprise a regular grid formed of GRC rain screen panels with aluminium framed window units. The GRC would have a variety of surface finishes in different shades to create visual interest across the facades.
- 16.27 Artificial stone would be used on the external elevations of Building J and the internal courtyard facades within Plot B. The façades would be broken down into horizontal bands using artificial stone panels and aluminium framed windows. The artificial stone panels would incorporate a range of textures and different shades.
- 16.28 It is considered that the extensive use of brick would respond well to the context provided by existing buildings in Anchor and Hope Lane. The use of different façade treatments and materials would add variety and would lend a distinctive style to each building whilst providing a unified composition across the whole scheme. The design approach is therefore supported. Further details of materials and architectural detailing will be secured by conditions. A condition will also be applied to ensure that the design of the residential entrances provides a consistent quality throughout the site regardless of tenure.
- 16.29 Earlier proposals for the site were considered by the Design Review Panel at the pre-application stage in June 2016 and following the submission of the current application in January 2017. The scheme as revised in December 2017 was then considered by the Design Review Panel in February 2018.
- 16.30 Following the most recent review the Panel made the following general comments:
- ‘The scheme has improved considerably since the Design Workshop of June 2016 and has been influenced significantly by the emerging Charlton Riverside Supplementary Planning Document (SPD). We are encouraged by the improvements made since February 2017 particularly in the choice of materials and reduction in height across the site as well as consideration of how the scheme integrates into the wider area. We also welcome the reduction in density from the scheme presented in February 2017’
- 16.31 In relation to urban design and materiality the Panel stated:
- ‘As with other aspects of this design scheme, there is a clear opportunity to set a precedent for future developments to follow on Charlton Riverside. In this regard, the scheme has progressed well since the Design Workshop of June 2016 and suggests that it will set a good example of urban design in the area.’

6.32 However, the Panel also noted that a number of features of the scheme did not adequately reflect the aspiration of the SPD. These points are summarised as follows:

- The Eco Walk is incomplete in its connection across the site;
- The width of the east/ west carriageway raises concerns for driver and pedestrian safety and about the proximity to existing residences in Atlas Gardens;
- The design of the pathway to the river potentially creates a hostile environment for pedestrians;
- The space in the north east corner of Plot A should be carefully considered to invite users onto the pathway and improve safety;
- Vehicle access within the scheme should be reappraised and a carriageway looping around the north of the site should be considered;
- A greater sense of privacy should be created in spaces used by residents and to delineate between residential gardens and public realm;
- The configuration to allow sunlight through the open spaces between blocks is welcomed but sunlight and daylight studies should determine the location of key public spaces;
- The legibility of building frontages could be improved by more appropriate positioning towards the public spine and eastern carriageway with clearer celebration of entrances;
- The ground floor location of the community centre should be reconsidered to avoid inactivity at ground floor level during the day;
- The positioning of the gateway building on Plot B is questioned;
- The internal layout is unambitious and there are concerns about double loaded corridors and the proportion of single aspect units.

16.33 The design of the scheme has evolved in response to comments made at the earlier Design Reviews and the scheme has been revised again since it was considered at the most recent Design Review. Further consideration has been given to the east-west access route and the site's future connection with the wider area. The building on the corner of Plot B has been revised to accommodate a future access road and the architectural treatment of this building has been reworked with a curved façade. Whilst alternative access arrangements and pedestrian routes as suggested by the Panel could be introduced, the proposed layout is considered acceptable. Whilst the suggested design improvements are noted these are not considered essential to make the scheme acceptable in planning terms.

- 16.34 Overall the design of the proposed development is considered acceptable, taking into account its relationship with the surrounding townscape context and the quality of the proposed architectural treatment is considered to be of a high standard. Having regard to the above assessment the proposal is considered to be in accordance with London Plan policy 7.6 and Core Strategy policy DH1.

Impact on heritage assets

- 16.35 Paragraph 129 of the NPPF requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal and that they take this assessment into account when considering the impact of a proposal on a heritage asset to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Paragraph 131 of the NPPF states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets. Paragraph 132 of the NPPF states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration, destruction or development within its setting. Any harm should require clear and convincing justification.
- 16.36 Paragraph 137 of the NPPF states that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 16.37 Policy 7.8D of the London Plan states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 16.38 Policy DH(h) of the Core Strategy states that planning permission will only be granted for proposals which pay special attention to preserving or enhancing the character or appearance of the conservation area. Development on sites in the vicinity of a conservation area and which have a visual effect on its character or appearance, should respect the setting of that area.
- 16.39 In accordance with the council's statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 it is necessary to have special regard to the desirability of preserving the setting of a listed building and to preserving or enhancing the character or appearance of a conservation area. Policy 7.8 of the London Plan requires that development affecting heritage assets and their settings should conserve their

significance, by being sympathetic to their form, scale, materials and architectural detail.

16.40 A small portion of the application site (the strip of land between Atlas and Derrick Gardens) falls within the Charlton Riverside Conservation Area which was designated on 21 March 2018. The western boundary of Plot A and the northern boundary of Plot B also adjoin the boundary of this conservation area. It is therefore considered that the proposed development would affect the character and appearance of this conservation area and the setting of the conservation area.

16.41 The application has been advertised as affecting the character and appearance of a conservation area. Historic England has been notified and has confirmed that the application should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.

16.42 The character of the conservation area derives largely from the area's historic association with riverside industry. The summary of the assessment for the designation of the conservation area notes that:

“Surviving buildings and archaeology illustrate the area’s development as a significant riverside facility for naval construction/destruction and as a major fuel transport hub. The enclaves of housing and the historic pub are the only fine grain urban development and convey the extent of activity on this part of the riverside for over 400 years. They illustrate the historic links between the riverside industries and the people who worked in those industries: the barge builders and shipbreakers and the watermen, ferrymen and lightermen operating on the Thames.”

16.43 Included within the conservation area are the residential properties in Derrick and Atlas Gardens which are considered to contribute positively to the character of the area.

16.44 The existing industrial buildings on the application site, together with extensive areas of parking and vehicle storage are considered to have a negative impact upon the character and appearance of the conservation area and its setting. The proposed development would remove unsightly elements, such as the vehicle storage in the area between Atlas and Derrick Gardens which would be replaced with landscaped open space. It is considered that this would enhance the character and appearance of the conservation area in accordance with paragraph 131 of the NPPF and Core Strategy Policy DH(h).

- 16.45 The proposed new development would introduce buildings of a larger scale compared to the existing ones and these new buildings would form a backdrop to the conservation area when viewed from the west. It is considered that the amended massing of the development on Plot A would provide an appropriate relationship with the properties in Atlas and Derrick Gardens and would respect the setting of the conservation area. It is therefore considered that the proposal is in accordance with paragraph 132 and 137 of the NPPF, London Plan 7.8 and Core Strategy policy DH(h).
- 16.46 The taller buildings on Plot B would create a more marked contrast with the scale of development within the conservation area which would affect its setting. However, in light of the poor context provided by existing buildings and the improvements to the visual quality of built development on the site that would be provided by the new buildings it is considered that any harm to the setting of the conservation area would be less than substantial and that the proposal is in accordance with paragraph 132 and 137 of the NPPF, London Plan 7.8 and Core Strategy policy DH(h).
- 16.47 The site adjoins properties at Atlas and Derrick Gardens, together with the Stone Foundries site which have recently been added to the Council's local heritage list. It is therefore necessary to assess the impact upon these undesignated heritage assets. Paragraph 135 of the NPPF states that the effect on the significance of a non-designated heritage asset should be taken into account when determining the application. It goes on to state that in weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Policy DH(j) of the Core Strategy states that in considering proposals affecting buildings on the **Local List of Buildings of Architectural or Historic Interest**, substantial weight will be given to protecting and conserving the particular characteristics that account for their designation. Consequently, proposals for the demolition or unsympathetic alteration of locally listed buildings will be strongly discouraged.
- 16.48 The properties at Atlas and Derrick Gardens comprise two small groups of maisonettes grouped around greens which were built c.1908. These were model workers homes built by Cory and Sons and were named after barges used to transport coal from Charlton. These properties are substantially intact with surviving historic features and fabric. Their interest also derives from their planned layout providing peaceful terraced enclaves grouped around small greens.

- 16.49 Having regard to the above assessment of the impact of the proposed development upon the properties in Atlas and Derrick Gardens and to the advice contained in paragraph 135 of the NPPF, it is considered that these properties would be indirectly affected by the proposals however the scale of the harm is not considered such to harm their significance. Furthermore, the proposals would not result in the demolition or unsympathetic alteration of these locally listed buildings and will preserve their characteristics. As such the proposal is considered to be in accordance with Core Strategy policy DH(j).
- 16.50 Stone Foundries comprises the J Stone and Co engineering works founded by Josiah Stone in 1831 and established at Charlton in 1916. The site is renowned for the manufacture of propellers used by navies and shipping companies worldwide.
- 16.51 Stone Foundries is considered worthy of local listing primarily for its historic interest. It is not considered that the proposed development at the application site would impact upon the value of this heritage asset.
- 16.52 A number of other non-designated heritage assets are identified in the Charlton Riverside Employment and Heritage Study which would be affected by the development. These include former railway alignment and buildings associated with the former ropeworks (Hemp Store, Manilla Mill and former canteen building) which lie within / adjacent to the application site. Policy 7.8E of the London Plan states that new development should make provision for the protection of archaeological resources and landscapes. The physical asset should where possible be made available to the public on-site or provision must be made for its investigation, understanding, recording, dissemination and archiving.
- 16.53 It is proposed to retain the railway tracks as part of the new walkway leading to the riverside. The applicant's assessment of the Ropeworks site states that these buildings are no longer in their historic use and have been substantially altered over many decades noting that the former rope works use is not legible from visual inspection. It is therefore concluded that these adjacent buildings and structures are of very low sensitivity and would not be significantly affected by the proposed development. It is considered that this assessment is reasonable. Whilst the loss of non-designated heritage assets from the site is accepted, conditions are recommended to secure a heritage access and interpretation plan and a programme of building recording and historic analysis in order to aid public understanding of the historic significance of the site.

16.54 The site lies within the Greenwich Peninsula and Foreshore Archaeological Priority Area. The Greater London Archaeological Advisory Service (GLAAS) has considered the submitted heritage assessment and has recommended that a condition is imposed to secure a two stage process of archaeological investigation. GLAAS has identified that the development will pose a risk to geoarchaeological deposits. However, the anticipated risk is not considered sufficient to justify refusal of planning permission provided that a condition is applied to require investigation be undertaken to advance understanding of the geoarchaeological conditions on the site. A condition requiring this investigation is therefore recommended.

16.55 GLAAS also notes that the application presents the opportunity to engage in a programme of public outreach through the investigation and recording of the site's 20th century industrial archaeology. It is therefore recommended that a condition is attached to secure such a programme.

17. Landscaping, Trees and Ecology

17.1 Policy OS (f) seeks to ensure that biodiversity features, including protected species are taken into consideration in development proposals. The policy also seeks to secure the retention of trees and the enhancement of features which contribute to biodiversity.

17.2 The Core Strategy identifies a number of areas of wildlife deficiency in the borough. The southern part of the site lies within one such area. Policy OS(e) states that in or near areas of wildlife deficiency the Royal Borough will take opportunities to secure the provision of areas to be managed as wildlife habitat and seek to maximise access to suitable sites where this would not conflict with protecting wildlife habitats from disturbance.

17.3 An ecological assessment report has been submitted with the application. This assessed the potential of the site to support a range of protected species. The report concludes that there is a negligible potential to support roosting bats in buildings however the retained trees on the site provide some potential for bat roosts. No specific mitigation or licensing in relation to bats is considered necessary however precautionary mitigation measures are recommended. The report found that badgers, water voles and otters are unlikely to be affected. No habitats to support amphibians or reptiles were found within or adjacent to the site and it was considered highly unlikely that the proposals would result in significant harm to any protected, rare or notable invertebrate populations.

- 17.4 In relation to black redstarts it was found that there was a lack of foraging habitat and few nesting opportunities are therefore this species was unlikely to be affected. The report notes that new foraging opportunities will be provided as part of the development and safeguarding measures for nesting birds are recommended.
- 17.5 The report recommends a number of mitigation measures including tree protection, pollution prevention to safeguard against run off or pollution events during construction, the submission of an updated bat survey if development works commence more than 2 years after the date of the original survey and the timing of works to avoid nesting birds.
- 17.6 Ecological enhancements are also recommended which include removal of invasive species, new native planting, provision of wild flower grassland and bio-diverse roofs, the incorporation of SuDs and the installation of bird and bat boxes.
- 17.7 In view of the above it is not considered that the proposal would result in significant harm to protected species and that suitable biodiversity enhancements can be incorporated as part of the development. A condition is recommended to secure implementation of mitigation measures and ecological enhancements in accordance with the approved report.
- 17.8 There are 16 mature London Plane trees situated on or adjacent to the western boundary of the site fronting Anchor and Hope Lane. These trees are protected by a Tree Preservation Order. There are also two individual trees (Lawson Cypress and Wild Cherry) on the western boundary of Plot A as well as group of Lawson Cypress adjacent to the north east corner of Plot A and a group of self-seeded Sycamores at the northern end of the access to the river. With the exception of the group of Sycamores all of the trees either on or adjacent to the site would be retained. The Tree Officer has reviewed the proposals and raises no objection subject to conditions to secure the implementation of tree protection measures.
- 17.9 Policies DHI and OS(f) of the Core Strategy seek a high standard of landscaping in all development, taking into account ecological and environmental factors, the maintenance and enhancement of tree coverage and suitable arrangements for parking and access. Policy 7.5 of the London Plan requires a high quality of landscaping to contribute to a comprehensible public realm.

- 17.10 The landscaping strategy seeks to create a series of diverse landscaped spaces within the site. The Community Centre which includes the public spaces adjacent to the proposed community spaces in Plot A would include lawns and play spaces and a residents' BBQ area whilst the riverside walk would include low level planting and seating along the route with the historic railway track incorporated into the design. The Public Spine which runs alongside Buildings G and H in Plot A would comprise play spaces, self-growing garden areas as well as swales alongside a hard surfaced access route. The Eco Walk would provide a pedestrian connection through the site with low level planting, areas of meadow grass and swales. Roof gardens to Buildings A, B and C would provide sculptured play elements, seating and planted areas.
- 17.11 In Plot B the Workspace area would provide a hard landscaped urban plaza with seating and play equipment. The Podium Garden would provide a more intimate communal space for residents comprising lawns, seating and play equipment. The roof gardens in Plot B are designed for relaxation with extensive planting areas and seating.
- 17.12 The landscaping proposals include tree planting throughout the site comprising predominantly native species supplemented with some exotic species. The planting strategy has sought to align trees with the north-south and east-west routes in order to aid navigation through the site. The landscaping strategy incorporates measures to promote sustainable drainage in the form of permeable paving, swales and rain gardens.
- 17.13 In view of the above considerations the proposals are considered to meet the requirements of the relevant policies.

18. Amenity

- 18.1 Core Strategy Policy DH(b) states when determining applications for new developments, extensions or renovations of buildings, the Royal Borough will only permit an application where it can be demonstrated that the proposed development does not cause an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight or privacy they enjoy or result in an unneighbourly sense of enclosure.
- 18.2 A daylight and sunlight report was been submitted which examined the impacts upon the adjacent residential properties arising from the amended scheme which was submitted in December 2017. This showed that with the proposed development in place 12 out of the 26 neighbouring properties tested would experience reductions in VSC, to one or more windows, in excess of 20% (This being the threshold considered noticeable on the BRE

guidance).

- 18.3 The properties affected were 11-12 through to 29-30 Atlas Gardens, 27-28 Derrick Gardens and 1-8 Anchor and Hope Lane. Of 105 windows tested 41 windows showed VSC reductions in excess of the level recommended by the BRE guidance. Of these windows 12 showed reductions of 20-29%, 23 showed reductions of 30-39% and 6 windows showed reductions of more than 40%. Properties at 11-12 Atlas Gardens, 13-14 Atlas Gardens, 19-20 Atlas Gardens, 21-22 Atlas Gardens, 23-24 Atlas Gardens and 1-8 Anchor and Hope Lane experienced reductions of more than 40% VSC to one window and reductions of between 30 -39% VSC to at least one other window.
- 18.4 With regard to sunlight, the assessment results showed that two windows at 11-12 Atlas Gardens, one window at 29-30 Atlas Gardens and one window at 1-8 Anchor and Hope Lane would experience sunlight levels below the recommended standard with the proposed development in place.
- 18.5 Further amendments to the scheme were submitted in February 2018 which reduced the height of Building H to three storeys, on the side closest to Atlas Gardens, with a fourth storey set back. A further assessment was carried out which takes account of these changes. This assessment shows the overall number of windows experiencing reductions in daylight has reduced from 41 to 33 when compared with the previous scheme. Where windows are still affected these are generally affected to a lesser degree with 8 windows experiencing losses between 30 and 39% compared with 23 in the previous iteration and now only one window experiencing a loss of more than 40% compared with 6 in the previous assessment. The remaining windows experience more minor losses within the range of 20 - 29% VSC.
- 18.6 11-12 Atlas Gardens, which has bay windows to the rear, would experience reductions in VSC to rear bedroom windows at ground and first floor level of between 20.4% and 29.1%. Properties at 13- 14, 15-16, 17-18, 19-20, 21-22, 23-24 and 25-26 Atlas Gardens would experience reductions to one or more windows ranging from 21% to 25.2%. Properties at 27 -28 Derrick Gardens and 27-28 Atlas Gardens would experience reductions of up to 26.2% and 27.6% respectively. Overall these reductions are considered to be minor and most windows would continue to receive daylight levels of around 20% VSC which is considered to be reasonable in an urban environment.
- 18.7 Properties at 29-30 Atlas Gardens would experience reductions to two windows of 35.7% and 30.7% (with retained VSC levels of 17% and 21.6%. 1-8 Anchor and Hope Lane would experience a maximum reduction to one window of 41.6% (with a retained VSC level of 13.3%) and reductions to 11

other windows ranging from 28.6% to 34.1% however retained VSC levels to these windows would be within the range of 18.1% to 25.5%

- 18.8 It is noted that the more significant reductions are limited to a small number of windows. Furthermore the majority of affected windows would continue to receive reasonable levels of daylight despite the reductions.
- 18.9 The results in relation to sunlight remained the same in the revised scheme as in the original assessment. Overall the level of sunlight reduction is considered acceptable in the context of the proposed development.
- 18.10 Whilst there would be some reductions in daylight and sunlight levels to some neighbouring properties is not considered that these would be such to justify refusal of the application, particularly in light of the Opportunity Area designation and the desire for an intensification of employment and residential identified through the Charlton Riverside SPD. Concerns have been raised about loss of daylight to the adjacent recording studio at Imex House however commercial premises are generally considered to be less sensitive to reductions in daylight than residential properties. It is not considered that any reduction in daylight levels to these premises would constitute grounds for refusal.
- 18.11 An assessment of sunlight received by neighbouring amenity areas was carried out in relation to the scheme submitted in December 2017. This showed that all of the 38 external amenity spaces assessed would achieve direct sunlight to at least 50% of their area for 2 or more hours on the 21st March, or see a reduction of no more than 20% from baseline levels with the proposed development in place. The impact of the proposed development on surrounding amenity areas is therefore considered to be negligible.
- 18.12 With regard to transient shadow it is noted that the proposed development would result in a degree of additional shadowing to neighbouring amenity areas. However, the assessment indicates that sunlight is able to pass the majority of amenity area before 10:00am on 21st March and would cause no additional overshadowing to these amenity spaces beyond 1pm. The shadow then tracks east and sunlight is able to pass unobstructed to the majority of the amenity areas within the application site for long periods of the day.
- 18.13 In the revised scheme the impact of overshadowing on neighbouring amenity areas shows either no change or an improvement in levels. The results of the transient shadow testing also remain the same as in the original assessment.

- 18.14 With regard to privacy it is noted that the proposed buildings (Blocks G and H) would be located at a distance of approximately 18m from the main rear walls of the properties at Derrick and Atlas Gardens, with an overhang which reduces this distance to 17.5m. This is further reduced to a minimum of 16.5m in instances where there are rear projections to the properties in Atlas Gardens. The proposed buildings on Plot B would be located approximately 30m from the closest windows of the properties Atlas Gardens and at 1-8 Anchor and Hope Lane. The siting of the proposed buildings is considered to provide a satisfactory degree of separation in an urban environment and would thus retain an acceptable level of privacy for neighbouring occupants.
- 18.15 It is considered that the reduction in height of Block H provides an improved relationship with the properties at Atlas Gardens whereas the previous proposal would have had an overbearing impact upon these properties. It is considered that whilst Block G would be taller, due to its stepped form, it would not result in an unacceptable overbearing impact or undue sense of enclosure to the properties in Derrick Gardens.
- 18.16 An assessment has been carried out in relation to the impact of the proposed development upon wind conditions in the vicinity of the site. The assessment found that in some locations there would be minor or moderate adverse impacts upon wind conditions. However, mitigation measures are proposed which include specific planting within the landscaping scheme, the use of solid balustrades to balconies and 0.5m high planters on roof terraces. The assessment concludes that with these measures in place there would be no adverse impacts on wind conditions. It is recommended that the implementation of the mitigation measures is secured by condition.
- 18.17 It is noted that there will be some changes in wind conditions on the site during the construction phase however these will be mitigated by the erection of a hoarding around the site. A condition is recommended to secure the provision of this mitigation.
- 18.18 An assessment of solar glare arising from the reflective surfaces of the proposed building was carried out in order to identify any adverse effects upon road traffic at five viewpoints around the site. The assessment of the scheme submitted in December 2017 indicated that there would be some local adverse impacts of minor to moderate significance. No significant changes to these results arose from the amended scheme. In response to this it is proposed to use low reflectivity glass on the upper floors of the Building in Plot B. This will be secured by a condition.

- 18.19 Having regard to the above assessment it is considered that a satisfactory level of amenity for neighbouring occupiers would be maintained with the proposed development in place. In addition the proposed development would bring about benefits to the general amenity of the area through the removal of unsightly vehicle parking from the area of land between Atlas and Derrick Gardens and the provision of landscaping which would provide an improved environment in the vicinity of existing residential properties.
- 18.20 It is acknowledged that there will be some impacts upon the amenity of local residents during the construction phase as the works are likely to result in increased levels of noise, dust and vehicle movements. The applicant has submitted a statement as part of the ES setting out how environmental impacts associated with the demolition and construction will be managed. Conditions will be imposed to secure a detailed Demolition and Construction Management Plan and a Construction Logistics Plan. It is considered that with these plans in place the impacts of the demolition and construction works can be satisfactorily mitigated.

19. Noise and Air Quality

- 19.1 Policy 7.15 of the London Plan states that development proposals should mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses.
- 19.2 London Plan policy 7.26 seeks to increase the use of the Blue Ribbon Network for freight transport. It states that development proposals adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance.
- 19.3 The site is located close to Murphy's Wharf, Angerstein Wharf and Charlton Riverside Wharf which to the north east and north west of the site. Operations at the wharves include the unloading of dredger ships. This may be carried out at any time of day as the arrival of ships is dependent upon the tides and such operations typically take place over many hours. These operations create high levels of low frequency noise which has the potential to carry over a wide area. Whilst the site does not directly adjoin any of the wharves, residential properties at the site could still be potentially affected by noise from wharf operations. It is therefore necessary to consider the specific noise impacts arising from wharf operations and how these might be mitigated in order to reduce the potential for complaints from future residential occupiers of the proposed development.

- 19.4 The main concerns in relation to noise impacts from the wharves are the impacts of noise upon users of external balconies, the level of sound insulation provided to internal spaces by glazing and the impact on noise levels when windows are required to be opened to provide cooling of internal spaces.
- 19.5 With regard to balconies it is noted that many of the units have been designed to include recessed balconies which provide a greater level of protection from external noise, however there are a number of units within Plot A which would experience elevated noise levels which do not have recessed balconies. Potential solutions to this include the provision of either full or partial enclosures to balconies to provide additional sound insulation details of which would need to be secured by condition.
- 19.6 Following discussions between the applicant, the wharf operators, the Port of London Authority and the Council's Environmental Health team a set of noise criteria have been agreed. These criteria set maximum noise levels for bedrooms at night and for habitable rooms during the day, taking into account mechanical ventilation to mitigate against overheating, and a maximum noise rating for wharf and dredger noise on balconies.
- 19.7 A condition is recommended requiring that it be demonstrated that the noise criteria are met. A further condition is recommended which requires the approval and implementation of a scheme of testing / details of modelling to demonstrate compliance with the noise criteria. The wharf operators and the Port of London Authority have confirmed that these conditions would address their concerns in relation to noise.
- 19.8 In addition to the noise impacts from wharf operations it is necessary to consider the impact of noise from adjacent industrial uses. Of particular concern are the operations at Stone Foundries directly to the east of the site where there is an industrial fan situated adjacent to the site boundary. The applicant has agreed to cover the cost of providing a permanent noise dampening device at the adjacent site which would reduce the noise emitted to 25dB. The Environmental Health officer has reviewed the proposals and has confirmed that the proposed noise attenuation is acceptable. The installation of the attenuation device, prior to the occupation of the proposed residential units, will be secured by a S106 clause.
- 19.9 The building directly adjacent to the northern boundary of Plot A is used as a recording studio. This use currently operates in close proximity to the residential properties at Atlas and Derrick Gardens and there is no record of noise complaints by residents. However, the owner of the recording studio

has expressed concern about the impact of prolonged construction works upon the ability to operate the studio due to the effects of noise and vibration. Off-site mitigation measures, in the form of soundproofing to the recording studio, prior to the occupation of the proposed residential units, will be secured by means of a S106 clause. The impacts of noise during the construction phase upon the recording studio will be dealt with through the construction method statement and through the use of notices under Section 61 of the Control of Pollution Act 1974 whereby certain noise generating operations will be carried out at pre-agreed times.

- 19.10 It is not considered that significant levels of noise will be generated by the proposed development, either from the presence of greater numbers of people on the site or from the proposed commercial uses. Conditions are recommended in relation to the operation of the proposed commercial uses and in relation to noise from plant, which will provide an acceptable level of mitigation.
- 19.11 In terms of air quality, policy 7.14 of the London Plan states that developments should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, and that they should also reduce emissions during demolition and construction phases.
- 19.12 Core Strategy policy E(c) states that development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to minimise the impact of air pollutants are included.
- 19.13 The whole of the Borough is designated as an Air Quality Management Area. At present the application site is subject to air pollution from both road traffic and industrial sources.
- 19.14 The impacts of the proposed development upon air quality at both the construction and operational phases of the proposed were considered in detail in the ES. The independent review of the ES has confirmed the approach to air quality to be acceptable and concluded that whilst dust mitigation would be required at the construction stage, no mitigation would be required in respect of the operational impacts of the development. The dust mitigation will be covered by the proposed condition in relation to construction management.
- 19.15 The Council's Air Quality officer requested further information in relation to the methodology used for the assessment of particulate matter, the impacts from the energy centre and in relation to odour assessment but confirmed that the Air Quality Neutral Assessment was satisfactory. Additional

information has been submitted by the applicant which has addressed these points. Conditions are recommended in relation to a further air quality assessment report, CHP and boiler emissions, construction plant and machinery, construction management and construction dust / emissions monitoring.

- 19.16 Furthermore, the officer advised against the inclusion of facilities for sensitive receptors such as children without further continuous monitoring for at least 12 months to establish that the site is suitable for such receptors. As set out in Section 15 a condition is recommended requiring the submission of further details in relation to air quality before any use as a crèche is commenced on the site. The applicant questioned the need for this additional monitoring. This has been reviewed by the Environmental Health officer who has stated that further monitoring is still required however it has been confirmed that the timescale for the additional monitoring may be amended to 6 months rather than 12 months. It is recommended that the wording of the relevant condition is amended to reflect this.

20. Transport and Access

- 20.1 Policy 6.3 of the London Plan states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed and that development should not adversely affect safety on the transport network. The policy requires the submission of Transport Assessments for major developments, together with Travel Plans where developments exceed the thresholds in the relevant TfL guidance.
- 20.2 Policy 6.13 of the London Plan states that the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- 20.3 Part of the site has a PTAL of 3, whereas the parts closer to the southern end of Anchor and Hope Lane have a PTAL of 4. The submitted Transport Assessment includes a detailed PTAL assessment for the site based on the average score of 7 points around the site boundary and argues that an average of 4 across the site should be used. TfL confirmed that this methodology is acceptable and the application has been assessed on this basis.
- 20.4 The majority of units within the scheme would not have access to parking spaces within the development (except for accessible parking) and no provision would be made for visitor parking off street. However, it is

proposed to provide 210 parking spaces for residents of the development. This equates to 0.27 spaces per unit. It is noted that TfL considers this amount of parking to be too high and wishes to see this reduced.

- 20.5 The applicant has responded to TfL's comments in relation to parking stating that the Draft New London Plan is only a draft policy and that the scheme has been designed to meet the adopted London Plan standards, which allow up to 1 space per unit. The applicant considers that the provision of 0.27 spaces per unit is appropriate and reflects a low level of provision. The applicant states that this is comparable to parking levels in other schemes consented in the borough.
- 20.6 The applicant goes on to state that the redevelopment of the Opportunity Area is in its early stages and currently public transport infrastructure does not exist to support a car-free development. Site specific circumstances should therefore be taken into account. It is also stated that a reduction in car parking spaces would affect the sales values and therefore affect the viability of the scheme.
- 20.7 In view of the above considerations it is considered that the proposed 210 spaces would provide an appropriate level of parking for the site, noting that this level is compliant with the adopted London Plan and having regard to the current level of public transport provision in the area.
- 20.8 The site currently lies outside the Charlton Controlled Parking Zone (CPZ). In order to control the demand for on-street parking it will be necessary to extend the CPZ (at the developer's expense) and also to restrict access to parking permits by future occupants of the development. In response to comments received from residents the applicant proposes that these restrictions should apply to both sides of Anchor and Hope Lane. These controls will be secured as part of the S106 agreement.
- 20.9 In order to address any residual demand for car use it is recommended that section 106 clauses are included to secure the provision of a new club space on street within the vicinity of the development and to secure payment of residents' car club membership fees for the first five years. A Travel Plan will also be secured by a condition in order to promote the use of sustainable modes of transport.
- 20.10 The Transport Assessment includes an assessment of the impact upon public transport. In response to this TfL has requested a contribution towards local bus services. This will be secured by a S106 agreement.

- 20.11 The existing access off Anchor and Hope Lane will be upgraded to provide access to the proposed development. The submitted plans include an internal access road to service the development which will run east to west from the site entrance and then northwards along the eastern boundary of the site. The other internal routes within the site will be predominantly for pedestrian use with controlled access for vehicles. These access arrangements are considered acceptable to meet the needs of the development.
- 20.12 There is an existing right of access to the adjacent commercial premises at Imex House, to the north of the site. This is the only means of access to these premises and the owners of Imex House require 24 hour access for vehicles including a tour bus. The submitted plans indicate that access through the site to Imex House will be retained via the 'playstreet' which will have restricted access for vehicles. A tracking diagram has also been submitted (based on a 10.97m long recreational vehicle) which demonstrates that there is sufficient space for the tour bus to enter and leave the site in forward gear. The Transport officer has confirmed that this is acceptable. The management of vehicular access within the site will be controlled by an estate management company and further details of the management arrangements will be sought by a condition.
- 20.13 The Charlton Riverside Masterplan SPD indicates that a new east-west route will be provided through the Charlton Riverside area. As set out in the SPD this would comprise an access road of 24 -27m in width capable of accommodating two lanes of traffic, a bus lane, cycle lanes, pavements and landscaping. The applicant has amended the scheme (by cutting back the footprint of the buildings on Plot B) in order to allow sufficient width for this new access road to be delivered in future. An indicative layout has also been submitted which shows how this new road might be delivered. A S106 clause is recommended in order to secure the land required to construct the access road together with a financial contribution. It is considered that adequate provision has been made within the scheme to deliver the future roadway and as such this is considered acceptable.
- 20.14 The layout of the proposed parking spaces within the site is acceptable. A condition is recommended to ensure that spaces are allocated through a Car Park Management plan. A further condition is recommended to secure the provision of active EVCP charging points to 20% of the parking spaces in line with the recommendations of TfL.
- 20.15 It is proposed to provide 78 wheelchair accessible / wheelchair adaptable units and 51 Blue Badge spaces. This level of provision is considered to be acceptable as noted in the comments from TfL.

20.16 It is proposed to provide a total of 1,323 cycle parking spaces within the development. This level of provision is considered acceptable. Further details of the design and layout of the cycle parking, together with details of facilities such as storage and showers for the non-residential uses will be secured by a condition.

20.17 A contribution towards improvements to local cycle routes and nearby junctions will be sought through a S106 agreement, together with a contribution towards cycle training for residents of the development.

20.18 The submitted assessment of trip generation is considered to be acceptable.

20.19 Servicing is to be carried out from within the site with access from Anchor and Hope Lane. A servicing and delivery plan will be secured by condition.

20.20 A S106 clause will be required to secure the relaying of the footway along the site frontage.

21. Waste Management

21.1 It is proposed to provide refuse storage areas for the residential units within the basements of Buildings A, B, C, D and F on Plot A and in the basement which serves all of the buildings on Plot B. The bin stores have been designed to accommodate the required number of bins for the part of the development that they serve and the bin stores will be located close to the building cores for ease of access. Within Plot B the bins will be taken to a centralised bin holding area in the basement and then to ground level via a dedicated refuse lift for weekly collections. On Plot A the collection will be on the Plot A service road for Buildings A/B/C/D/EF and on Plot B the refuse will be collected from the Plot B service road below building K. Buildings G and H on Plot A will have a refuse store on ground floor which can be accessed directly from the servicing route on the Play street for the weekly collections.

21.2 The Waste Services team has been consulted and, following the submission of further information from the applicant, has confirmed that the proposals are satisfactory subject to a condition seeking the submission and approval of a detailed refuse management plan.

23. Sustainability and Energy

23.1 The National Planning Policy Framework states that Local Planning Authorities should support developments which promote renewable and low carbon energy.

- 23.2 The London Plan (2016) Policy 5.1 seeks an overall reduction in carbon dioxide emissions whilst Policy 5.2 states that major development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following hierarchy:
1. Be lean: use less energy;
 2. Be clean: supply energy efficiently; and
 3. Be green: use renewable energy.
- 23.3 Core Strategy Policy EI states that carbon emissions will be reduced in accordance with the Mayor's energy hierarchy.
- 23.4 London Plan policy 5.2B states that for the period 2016-2019 non-residential developments should achieve the carbon dioxide reduction targets set out in the Building Regulations. This envisaged that Part L of the Building Regulations 2013 would be updated to require further reductions in carbon dioxide emissions however this change to the Building Regulations has not been implemented. The GLA guidance on preparing energy assessments dated March 2016 states that the GLA will continue to require that non-domestic buildings achieve a 35 % reduction against Part L 2013.
- 23.5 The Be Lean requirement will be met by reducing energy requirements through building fabric efficiencies.
- 23.6 In relation to the Be Clean requirement it is proposed to install a natural gas CHP system to supply a community heat network.
- 23.7 The Be Green requirement will be met through the installation of PV panels.
- 23.8 It has been demonstrated that a total reduction in carbon emissions of 65% in respect of the residential element of the scheme can be achieved through the above measures. The remaining carbon dioxide emissions will be offset by a carbon offset contribution in order to meet the Zero Carbon standard. This will be secured through a S106 clause. The non-domestic element of the scheme would achieve a 55% reduction in carbon dioxide emissions which is in accordance with the required standard. Conditions will be imposed in order to ensure that above standards are met in the completed development.
- 23.9 The submitted BREEAM pre-assessment indicates that the proposed scheme will achieve 'Excellent' which is considered acceptable. A condition is recommended to ensure that this standard is met in the completed development.

- 23.10 The Sustainability officer generally supports the approach set out above but has asked that the applicant considers alternative heating solutions including water source heat pumps. The applicant considers that water source heat pumps are only economically feasible if the proposed housing is in close proximity to the river. In this instance it is considered that CHP would be a more cost-effective solution.
- 23.11 The Sustainability officer also notes that the Charlton Riverside is part of a wider regeneration project and seeks to encourage the developer to take this into account when designing the energy strategy. It is anticipated that the area will experience a large increase in demand for energy and a collaborative solution with other developers is encouraged.
24. Flood Risk
- 24.1 The National Planning Policy Framework aims to ensure that flood risk is taken into consideration at all stages in the planning process steering development toward low risk areas. London Plan Policy 5.12 requires proposals to comply with flood risk assessment and management requirements set out in the NPPF.
- 24.2 Policy E2 of the Core Strategy states that the Council's Strategic Flood Risk Assessment will be used to inform development and reduce flood risk in the Borough.
- 24.3 The site is located within Flood Zone 3 but is protected by the Thames Tidal defences however there is a residual risk of flooding in the event of a breach of flood defences.
- 24.4 In accordance with the above advice it is necessary to apply the sequential test to ascertain the availability of suitable sites in areas of lower flood risk before considering development within Flood Zone 3. The area where the site is located has been identified as a Strategic Location for Growth in the Core Strategy and as such priority may be given to this over other potential locations for development in the borough. As such it is considered that the sequential test has been met.
- 24.5 Residential development is classified as 'More Vulnerable' development and where this is proposed within Flood Zone 3 it is necessary to demonstrate the proposal meets the exception test. In order to pass this test it must be demonstrated that the development provides wider sustainability benefits to the community which would outweigh the flood risk associated with the development and that the development will remain safe over its lifetime

without increasing flood risk elsewhere.

- 24.6 In this case the site is located in an area identified for increased growth and would bring about the re-use of brownfield land as part of a comprehensive regeneration strategy and would contribute towards meeting local housing needs. These benefits are considered to outweigh the flood risk and therefore the first part of the exception test is considered to be met. The safety of the development and impact upon flood risk elsewhere are considered in more detail below.
- 24.7 Policy E3 states that within those areas protected by flood defences but with a high residual risk classification should implement risk reduction measures with the primary aim of reducing risk to life.
- 24.8 The Council's Strategic Flood Risk Assessment (SFRA) states:
- ‘In areas at risk of a breach in the tidal defences, development of habitable rooms including bedrooms may be considered acceptable subject to the Borough being assured that the development is safe. As a minimum Structural measure, this will require an internal safe-haven within each unit to be built with a floor level at least- 300mm above the maximum water level caused by a defence breach during a 0.5% annual probability event plus climate change event’.
- 24.9 The Charlton Riverside SPD provides general advice with regard to flood risk to be applied within the Charlton Riverside Masterplan area. This recommends that no habitable rooms should be provided at ground floor level; slab levels should be raised to provide ground floors with an element of free board relative to flood levels; accommodation within basements or semi-basements should be avoided and refuge spaces and safe means of escape from dwellings in a flood event should be provided.
- 24.10 It is noted that the proposed development includes habitable accommodation on the ground floor. However, this is restricted to the lower floors of duplex units on Plot A which have only living / kitchen /dining areas at ground floor level and bedrooms on the upper floors above the modelled flood level. Whilst this provides a satisfactory solution in terms of flood risk it would preclude the adaption of the units to provide downstairs sleeping accommodation should this be required to meet the needs of occupants in future. In this respect the duplex units would not meet the full requirements in relation to the provision of adaptable dwellings.

- 24.11 The Environment Agency raised concerns about the potential flooding of the basement car park on Plot A. In response to this the applicant provided further information to demonstrate that users of the car park would have access to safe areas above the modelled breach level. The Environment Agency is satisfied with this information but remains concerned about the fact that it has not been demonstrated that users will have sufficient time to escape safely if the basement is flooded. Further calculations would be required with regard to the rate of inundation in order to demonstrate this. In response to the latest consultation the Environment Agency has confirmed that it is satisfied that the development could be allowed in principle but further information is required to ensure that the proposed development can go ahead without posing an unacceptable flood risk to users of the basement level. This further information will be secured by a pre-commencement condition.
- 24.12 The submitted Flood Risk Assessment (FRA) states that flood resilient construction techniques will be incorporated in the development. The FRA also recommends that occupants register with the Environment Agency's flood warning service, 'Flood Line', so that they may prepare themselves in case of a flood event. A condition is recommended to ensure that the recommendations of the FRA are implemented. A further condition will secure the submission of an emergency evacuation plan. Reference to a specific evacuation plan for any proposed crèche use will be included in the condition which secures further details in relation to the crèche.
- 24.13 Policy 5.13 of the London Plan advocates the use of Sustainable Urban Drainage systems with the aim of achieving greenfield run off rates and seeks to ensure that surface water is managed as close to its source as possible in accordance with the London Plan drainage hierarchy. The policy states that drainage should be designed to meet other policy objectives including water use efficiency and quality, biodiversity, amenity and recreation.
- 24.14 Core Strategy policy DH1 states that developments should demonstrate measures that reduce surface water flood risk and landscape the environment in a way that provides for permeable surfaces;
- 24.15 The proposed development has been designed to attenuate a 1 in 100 year event (plus climate change) in relation to surface water. The scheme incorporates a number of sustainable drainage measures which include sedum roofs to reduce run-off from roofs, swales within the landscaping to provide flood storage, attenuation ponds to regulate the flow of surface water run-off and underground storage tank to attenuate rainfall.

- 24.16 The submitted documentation states that preliminary calculations indicate that surface water run-off would be 86% lower than pre-development rates, and the extent of the existing impermeable hardstanding areas would be significantly reduced with a potential reduction in the discharge rates to the existing drainage system equivalent to 86%.
- 24.17 Thames Water identified that existing waste water infrastructure is inadequate to meet the needs of the development and that there is also insufficient water supply capacity. Conditions are recommended to ensure that no development takes place until a detailed drainage strategy and a water infrastructure impact study have been submitted to and approved by the Council in consultation with Thames Water.
- 24.18 Thames Water requested further information in relation to surface water drainage in terms of how the proposal follows the surface water drainage hierarchy set out in Policy 5.13 of the London Plan. Thames Water queried the methodology used for the calculation of runoff rates and stated that the proposed connection points to the public sewer and anticipated flow into the connection point should be clearly stipulated in the drainage strategy for the proposed development. It is considered that these matters can be addressed through the submission of a detailed drainage strategy and a condition is recommended to secure this.

25. Contamination

- 25.1 Policy E(e) of the Core Strategy seeks to avoid the health and safety hazards associated with contaminated land by requiring preliminary site investigations to be submitted prior to determining an application and through the imposition of conditions to secure remediation.
- 25.2 The site has a long history of industrial use, including rope making and general industrial uses and current uses of the site include vehicle repairs and dismantling. The site is therefore likely to be affected by contamination. A preliminary risk assessment has been carried out which has found that no specific highly contaminative activities have been identified as having taken place on site and that the potential for soil and ground contamination is similar to any site with a general industrial past. The report recommends that a further inspection of internal and external areas of the site and a Phase II environmental site investigation and risk assessment will be required at the detailed design stage to determine whether or not remediation is required, and the scope of any required remediation.

- 25.3 The Environmental Health officer has reviewed the report and raises no objections subject to conditions requiring the submission and approval of an investigation report, details of remediation and verification report to demonstrate the completion of the remediation works.
- 25.4 The Environment Agency has identified that the proposal may have an impact upon groundwater within underlying secondary aquifers. A condition is recommended in relation to piling to ensure that there is no unacceptable risk to groundwater.
26. Security and Community Safety
- 26.1 London Plan policy 7.3 states that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. Core Strategy policy DHI requires proposals to demonstrate that the development contributes to a safe and secure environment for users and the public. Policy CHI states that developments should consider community safety and aim to discourage crime and ensure that publicly accessible spaces and buildings such as streets, parks and public squares are well maintained and provide opportunities for natural surveillance.
- 26.2 The layout of the site would present active frontages at ground floor level in Plot B and opportunities for the natural surveillance of amenity areas, public open spaces and access routes within Plot A. It is noted however that there are parts of the site that could attract anti-social behaviour, for example the path to river and the boundaries with adjacent industrial uses. The applicant has agreed to provide a management plan for the site setting out how this will be addressed and this will be secured by condition. A condition will also be imposed requiring the development to achieve Secured by Design accreditation as recommended by the Designing out Crime officer.
- 26.3 As set out in Section 15 the proposals will include a space within Plot B to provide welfare facilities for the Metropolitan Police. It is considered that this will support local police operations and contribute to improving community safety.
27. Community Infrastructure Levy (CIL)
- 27.1 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1st April, and it will be paid on commencement of most new development in Greater London that was

granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £35 per square metre.

27.2 The current application is liable for Mayoral CIL.

28. RBG CIL

28.1 The Royal Borough adopted its Local Community Infrastructure Levy (CIL) charging schedule, infrastructure (Regulation 123) list, instalments policy and exceptional circumstances relief policy on the 25th March 2015 and came into effect in Royal Greenwich on the 6th April 2015.

28.2 The current application is liable for RGB CIL.

29. Planning Obligations

29.1 The Charlton Riverside Masterplan SPD sets out a number of future options for the funding of the specific infrastructure required to deliver the planned regeneration of the area. However, at present all strategic infrastructure provision such as schools and healthcare is to be funded by CIL.

29.2 Site specific infrastructure and other requirements as set out in the Planning Obligations SPD will be provided through a S106 agreement. A total of around £4.9m will be secured in S106 contributions. The table below sets out the estimated contributions however it should be noted that these will be subject to final confirmation.

Affordable housing

Clause / Contribution	Details / Amount
Number of affordable units / % of total units	193 (25%)
Number of social rented, affordable rent, intermediate units	137 social rented (71%) 56 intermediate (29%)
Rent levels	Range of rents up to 80% of market rent with three bedroom units to be at target rent
Early review mechanism if development not commenced within 2 years	
Late stage review upon sale of 75% of units	

Transport

Clause / Contribution	Details / Amount
Provision of land / contribution towards delivery of East West access road	£2,100,000 (estimate)
Improvements to local cycle routes and nearby junctions / pedestrian improvements	£150,000
Re-provision of footways along site frontage if not covered by above	S278 agreement
Financial contribution towards cycle training	£15,420
Setting up or extension to existing car club	£3,000 Traffic Order £500 Road markings for each set of bays provided on street
Payment of car club membership for future occupants for 5 years	£231,300
Review of Charlton CPZ to implement on-street parking restrictions, on both sides of Anchor and Hope Lane	£10,000
Traffic Order amendments to restrict access to parking permits for future occupants	£3,000
Improvements to bus services / infrastructure	£830,000
Travel Plan monitoring contribution	£1,260

Employment and Training

Clause / Contribution	Details / Amount
Commitment and participation towards GLLaB and business support, including financial contribution	Residential £771,000 Commercial £40,690
Marketing plan for non-residential space to include details of how and where the units will be marketed and rental levels to ensure these are being marketed at a reasonable rate	Details to be agreed

Affordable workspace provision / engagement of workspace provider	<p>The following to be included in the workspace lease:</p> <ul style="list-style-type: none"> • Long lease between the developer and the workspace provider • Agreed affordable price point for the workspace provider and the target licensees/ end users • Rent increase pegged to RPI • Co-design to ensure the scheme design meets the requirements of the end user • Support for fit out costs
Business relocation strategy	Details to be agreed
Scheme for establishing links with local education establishments	Details to be agreed

Environment

Clause / Contribution	Details / Amount
Carbon offset contribution	£774,000
Off-site noise attenuation measures at Stone Foundries / Imex House	<p>Provision of attenuation device at Stone Foundries site</p> <p>Provision of soundproofing to recording studio at Imex House</p>

Other

Clause / Contribution	Details / Amount
Police facilities	17sqm allocated within building on Plot B
Agreement to community use of spaces within Plot A	Details to be agreed

29.3 The S106 clauses outlines above shall be subject to the following specific triggers:

- The employment space within plot B shall be constructed to shell and core on a block by block basis prior to first occupation of the residential units.

- No development shall commence on plot A, other than blocks A and B (and excluding site clearance, preparatory work and construction of the basement) until the land shown on plan [XX] is within the control of the applicant or the applicant has underwritten the costs of the Council undertaking a CPO of the land.
- Not to occupy more than 50% of the residential accommodation within Plot A until 100% of the affordable housing is disposed of to an RP.
- Prior to occupation of blocks E, F, G and H the developer shall pay the financial contribution required for the delivery of the East-West route.

30I. Implications for Disadvantaged Groups

30.I The implications for disadvantaged groups identified below are an integral part of the consideration of the development and community benefits as set out in the report:

- Employment opportunities at the construction phase and through the provision of workspace and other commercial uses on site
- Access to community facilities
- Affordable housing
- Additional public open space

3I. Conclusion

3I.1 Having regard to the above assessment the principle of mixed use development on the site is considered to be acceptable. The level of employment provision and proposed community uses are also considered acceptable.

3I.2 Overall the design quality is considered to be of a high standard and it is considered that the scheme will bring about improvements to the quality of the environment on the site. Furthermore it is considered that the proposals would respect the character and appearance of the adjacent conservation area, locally listed buildings and their setting.

3I.3 The impacts of the proposed development upon the amenity of neighbouring occupants has been assessed and has been found to be acceptable. Appropriate provision has been made to address the infrastructure requirements of the development and to mitigate its environmental impacts.

- 31.4 It is acknowledged that some aspects of the scheme are not entirely in accordance with the form of development envisaged by the Charlton Riverside Masterplan, for example taller buildings beyond the indicative height ranges identified for certain parts of the site. Densities are also greater than specified in the SPD.
- 31.5 With regard to the amenity for future residents of the scheme it is acknowledged that there are some compromises in terms of daylight and sunlight when compared with the BRE guidance, however the overall standard of amenity across the site (taking into account such matters as the generous amenity space and play provision) is considered to be satisfactory.
- 31.6 On balance it is considered that overall the proposals are acceptable and would contribute to delivering the regeneration of the Charlton Riverside area. Accordingly, it is recommended that permission be granted for application reference 16/4008/F in line with Section 1 of this report.

Background Papers:

- National Planning Policy Framework (March 2012)
- Planning Practice Guidance
- The London Plan (2015)
- Minor Alterations to the London Plan (March 2016)
- Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014)
- Consultation responses

Report Author: Jillian Holford (Principal Planning Officer)
Tel No: 020 8921 4332
Email: jillian.holford@royalgreenwich.gov.uk

Reporting to: Victoria Geoghegan - Assistant Director Planning & Building Control
Tel No: 20 8921 5704
Email: Victoria.Geoghegan@royalgreenwich.gov.uk