

Ceara Shields

From: Louise Thayre [<mailto:Louise.Thayre@royalgreenwich.gov.uk>]

Sent: 24 June 2016 14:23

To: 'Smith, Greg (Bilfinger GVA)' <Greg.Smith@gva.co.uk>; Andrew Parker <andrew.parker@royalgreenwich.gov.uk>

Cc: Brown, Stephen (Bilfinger GVA) <Stephen.Brown@gva.co.uk>; Ben Green (bgreen@rockwellresidential.com) <bgreen@rockwellresidential.com>; Rachel Naylor <rnaylor@ramboll.com>

Subject: RE: Charlton Riverside

Greg,

I refer to your email dated 5th May 2016 in regards to the above.

Please find below the comments received from the consultees on the informal scoping opinion. Comments have already been sent you in regards to the TVIA.

We are still waiting for comments from NHS England who have expressed a wish to comment on the scoping opinion. These will be forwarded on to you once we have received them.

We are still looking into the details provided on certain chapters such as Daylight/Sunlight and Wind Micro Climate and further comments may be sent you in this regard.

If you wish to discuss any of the comments raised, please contact Andrew Parker.

Regards

Louise

External Comments:	
London City Airport	<p>The Aviation section (7.8) within the report states 'The application site is not located within the London City Airport Safeguarding Zone, and when considering this and the proposed heights of the redevelopment, it is considered that aviation impacts are not an issue. Therefore, an aviation assessment has been scoped out of the ES', which is incorrect.</p> <p>London City Airport's safeguarding area covers up to 10km from the runway centre point which includes this planned development area and therefore we would strongly encourage the applicants to consult with the airport before submitting a planning application to ensure that the building heights are below the obstacle limitation surfaces.</p> <p>The airport would have no preference as to whether the aviation section is included within the ES or as a stand-alone document.</p>
Sports England	<p>Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently we do not wish to comment on the Screening or Scoping Opinion consultation.</p> <p>Any subsequent planning application should however consider the implications for sport</p>

	<p>in the context of NPPF Para’s 73 and 74, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.</p> <p>Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).</p> <p>General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/</p>
<p>Historic England (Archaeology)</p>	<p>It is recommended that archaeology is scoped in as part of any planned EIA for the site. A key element of the assessment report will be the inclusion of a suitable deposit model of the site and its immediate area.</p> <p>Any planned geotechnical works should therefore be considered by the archaeological desk-based assessment report.</p>
<p>Historic England (Development)</p>	<p>No comments.</p>
<p>Port of London</p>	<p>Site Context / Planning Policy</p> <p>The application site is located in close proximity to the safeguarded Angerstein, Murphy’s and Riverside wharves. It is also located in close proximity to Charlton Barge works. The wharves are safeguarded by Ministerial Direction and policy 7.26 of the London Plan protects safeguarded wharves for waterborne freight handling use. It states that development proposals “adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance.” Paragraph 7.79 expands on this point explaining that “the challenge is to minimise conflict between the new and the old land uses. This must be met through modifications and safeguards built into new and established developments...New development next to or opposite wharves should utilise the layout, use and environmental credential of buildings to design away these potential conflicts. Appropriate highway access to wharves for commercial vehicles needs to be maintained when considering proposals for development of neighbouring sites.”</p> <p>Waterway support infrastructure such as Charlton Barge works are protected and their enhancement sought through the London Plan policy 7.27.</p> <p>The London Plan seeks to manage the impact of noise by “separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation.” The supporting text to policy 7.15 states at paragraph 7.52 “it is important that noise management is considered as early as possible in the planning process, and as an integral part of development proposals. In certain circumstances it can also mean preventing unacceptable adverse effects from occurring”</p> <p>Whilst the Scoping Report refers under Regional Policy to the Safeguarded Wharves Review (2013), this is with the Secretary of State for consideration. Regard should also be had to the Safeguarded Wharves on the River Thames London Plan Implementation Report (January 2005)</p>

The key issues that need to be considered are site layout and design, noise, air quality, lighting, transport and access. Consideration should be given to the levels that are currently generated from the safeguarded wharves and from Charlton Barge works and the levels that could reasonably be expected to be generated from these sites in the future. A reasonable worst case position in relation to the wharves and the barge works needs to be assessed. It is therefore recommended that the applicant and their consultants engage with the wharf operators, their noise consultant and Cory Environmental. Contact details can be provided to the Council if required.

Site Layout/Design

Whilst there is no in principle objection to residential development being located in close proximity to a safeguarded wharf, for example at Greenwich Millennium Village residential development is being built next to Angerstein and Murphys wharves, it is essential, in line with London Plan policy that any development is designed reducing the number of habitable rooms that overlook the wharves and barge works and where possible less sensitive uses are located at the closest point to the wharves and barge works. The ES should explain how the design of the proposed development has met this requirement.

Noise, Air Quality and Lighting

The noise and air quality assessments should consider the implications of the operations at the safeguarded wharves and at the barge works on their site. Mitigation measures should be identified if required.

It is noted that light spillage is considered a non significant issue however any application should demonstrate that an assessment has been undertaken of any lighting at the safeguarded wharves and at the barge works and its impact on the application site. Mitigation measures should be identified if required.

It is recommended that the operators are contacted prior to the baseline monitoring taking place to ensure that representative data will be obtained. If this is not possible then the operators should be asked to confirm post monitoring that the dates/times that the monitoring was undertaken would have captured representative data for their site, including vessel unloading – this is particularly important for sites in Charlton due to the low frequency nature of dredgers which require specific mitigation.

Transport

The Transport Assessment / transport chapter of the ES should clearly demonstrate how appropriate highways access to the safeguarded wharves and to the barge works will be maintained. This should include during construction and on completion of the proposed development.

It should also be explained how the use of the River Thames will be maximised during the construction period for the transport of bulk materials (demolition and construction).

It is noted that the Scoping Opinion refers to Charlton Station, North Greenwich Underground and to the local bus routes – no reference is made to the river bus stop at North Greenwich. The Transport Section of the ES / Transport Assessment should include targets for river bus use and set out measures to encourage people to travel by river.

Conclusions

There are a number of assessments that need to be undertaken to support any planning

	<p>application. As well as reporting the assessments and any mitigation in the ES it is recommended that a stand alone Safeguarded Wharves report is submitted with the application.</p> <p>The PLA is willing to engage with the applicant at the pre-application stage to discuss the complex juxtaposition issues that have been identified above, which will require to be addressed in any planning application.</p>
<p>Thames Water</p>	<p>Section 7.5 Water Resources & Flood risks indicates that detailed drainage design will not be undertaken ahead of permissions being sought. However, we would like to emphasise the importance of early consultation as water and waste water infrastructure is essential particularly for a development of this scale. The developer needs to consider the net increase in both water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided</p> <p>We would therefore recommend that any scoping opinion report and/or supporting documents to the planning applications should include the following.</p> <ul style="list-style-type: none"> • The developments demand for water supply and network infrastructure both on and off site and can it be met • The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met • The surface water drainage requirements and flood risk of the development both on and off site and can it be met • Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation • Any piling methodology and will it adversely affect neighbouring utility services. <p>Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0800 0093921</p>
<p>Natural England (Original comments provided)</p>	<p>Case law (1) and guidance (2) has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England’s advice on the scope of the Environmental Impact Assessment (EIA) for this development.</p> <p>The proposal triggers our impact risk zone for the Thames Path National Trail. The EIA should give due consideration of any potential impacts upon users of this right of way and appropriate points on the National Trail should be included in the Landscape and Visual Impact Assessment.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.</p>
<p>Environment Agency (Original comments provided)</p>	<p>The key issues and opportunities for the Environment Agency are:</p> <ul style="list-style-type: none"> • Flood risk management and climate change • Ecology and biodiversity • Groundwater and contaminated land • Sustainable design and construction. <p>We set out our detailed advice as to the information we consider should be provided in the ES to allow a proper assessment of the environmental impact of the proposed development in Section 1 appended to this letter.</p>

	<p>The regeneration of this area offers major opportunities for environmental enhancements.</p> <p>We are keen to understand how individual development sites like this one will contribute towards the overall master plan objectives for Charlton riverside and will deliver the quality environmental infrastructure in line with the vision for this area. We welcome the opportunity to work closely with you to offer environmental advice and evidence for this site.</p>
<p>Transport for London</p>	<p>The EIA scoping document does not contain detailed transport information regarding the assessment of the scheme, however Transport for London (TfL) has the following comments:</p> <ol style="list-style-type: none"> 1. The site of the proposed development is located on Anchor and Hope Lane which is accessed directly from the A206 Woolwich Road, which forms part of the Strategic Road Network (SRN). The site is also located approximately 1km from the A102, which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and are therefore concerned about any proposal which may affect the performance and/or safety of the TLRN and it also has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. TfL will therefore be very interested to find out more details about the level of parking to be provided on site considering the congested nature of the surrounding highway network, especially Woolwich Road during peak times. The access to bus and rail services by residents and employees at the proposed development are key points that will need to be addressed within the technical transport sections. 2. The applicant should note that TfL operates a pre-application advice service which has been set up to enable developers to understand TfL's views on transport and infrastructure prior to submission of the application. Details can be found here: http://www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-advice. The applicant should initiate this process for application early on in the design development process. 3. TfL has prepared its own Transport Assessment best practice guidance to assist developers in scoping out the environmental and transport impacts. Each scheme should be assessed on its own merits through pre-application advice, but the guidance is a good starting point and should be referred to in the EIA scoping report, details can be found here: https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance. The EIA and TA must assess consistent impacts and be consistent in assessment years, for example, if the implementation and occupation of development slips beyond the design year (end state), the EIA and TA must adequately assess these impacts. The EIA and TA must include a multi-modal impact assessment including baseline and future car, bus, rail, river bus and pedestrian and cycle trips and mode share. Any vehicular additional vehicular trips that will access/egress to/from the A206 and A102 will have air quality and noise impacts that will need to be assessed. 4. The Screening Opinion states that a Transport Assessment, Travel Plan and Delivery and Servicing Plan will be submitted as supporting documentation. As part of the CMP, TfL will request for the applicant to submit a Construction Logistics Plan with the planning application. More advice can be provided on this during pre-application discussions. 5. The applicant should note that Greenwich and TfL are currently progressing an update of the Charlton Riverside Masterplan SPD. Some work has already been undertaken and one of the key issues in this particular area is transport, including bus connectivity and priority, the future role of Woolwich Road and rail connections. This work is continuing and the applicant should be aware that this work is being developed in parallel to their proposals.

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RBG Comments:	
Flood Risk Manager	<ul style="list-style-type: none"> • SuDS – The site will have to have SuDS with an expectation to greenfield run off rates, looking at the site layout, is there a discharge to the Thames from within the boundary? If so there would be an expectation that would be utilised. • Landscaping should include SuDS to create a management train and flow path to manage SW • Exceedance routes will need to be considered for the development • Evacuation plan will need to be undertaken • The water body referred to is an Ordinary Watercourse • I would rather the site be incorporated into the master plan, so a strategic view can be taken on the drainage of the site and water resources as a whole. • No habitable spaces below Flood levels, so would have concerns over inclusion of basements and would want to understand groundwater levels and interaction.
Housing	Affordable housing- 35% and a mix of 70% intermediate and 30% rented
Pollution	<p>I have the following comments to make on the submitted document</p> <p>2.2 baseline conditions</p> <p>Air Quality</p> <p>There is limited baseline information on air quality in this area. As it is currently a wholly industrial area there has been no need to undertake monitoring as there were no sensitive (residential) receptors. Considering the size of the aggregate zone and the presence of numerous Environment Agency licenced waste sites, it is probable there will be high levels of particulate matter. In addition there have been a number of complaints of odour from people using buildings on the edge of the Charlton Riverside area. There are a number of sites in that area which use solvents but not to a level that would require a formal Environmental Permit from the Council. In addition there are a number of potentially odorous processes including a food flavouring firm and three metal foundries which could be an issue. The scoping report specifically mentions complaints numbers being used as part of the assessment for air quality (para 6.7.1). This approach is not likely to give a true assessment of the existing environment on the new proposed receptors as there is no-body living there to make complaint. The fact we have complaints of odour from people visiting the area (see above) would suggest this may well be a significant issue if residential land use is permitted. The scoping report also asserts there is suitable air quality monitoring already being carried out. The sites mentioned are unlikely to give a good assessment of air pollution (particularly particulate matter) at the proposed development site.</p> <p>Noise</p> <p>There may also be issues with noise, particularly at anti-social hours including deliveries by HGVs. The unloading of ships in the aggregate zone is on a 24/7 basis. In addition it is not known what hours the existing businesses work. I will have regard to the draft Professional Practice Guidance issued by the CIEH/ Association of Noise Consultants in assessing any noise impacts on the site</p> <p>The viability of the remaining industrial processes may be compromised if new residents are introduced and then have the expectation of a residential type environment in a predominantly industrial area.</p> <p>7.6 Ground Conditions</p> <p>Contaminated land will be an issue on the site (along with the possibility of unexploded ordnance). Whilst a thorough site investigation and remediation strategy will be needed it is unlikely that contamination on its own would preclude development on this site. A site investigation and costed remediation proposals should accompany any application to</p>

	<p>develop this site for residential use.</p> <p>CIL S106 contribution If, despite the reservations outlined above, it is decided to grant consent for this development Environmental health would be looking for a S106 contribution to ensure compliance with the Mayor's SPG on Control of Dust & Emissions from Construction Sites and a significant CIL contribution to support the Council's air quality action plan.</p>
Transport and Highways	<p>As part of the planning application the applicant is intending to provide a Transport Assessment using TfL guidance. While I do not have any objection to this, reference is made to the 2007 version. The TfL transport assessment best practice guidance (TABPG) was first issued in 2006 and updated in 2010. Borough Partnerships has now updated the guidance to reflect changes to national policy, including the adoption of the National Planning Policy Framework and overall government objectives. The applicant is therefore advised to use the latest document.</p> <p>Any Transport Assessment will also need to take account of the proposals contained within the Charlton Masterplan given the significant potential changes in the area.</p>
Regeneration	<p>Page 9-10 – 3.3.3: Include reference to the new and emerging Charlton Riverside SPD which will supersede the 2012 SPD and on which the applicant has been consulted.</p> <p>Page 11-12 – 4.1.1: Include reference to locally listed buildings in the area.</p> <p>Page 26 – 6.9: Very important assessment due to the proximity to 2 storey residential properties and future uses on the Northern side of the site.</p> <p>Page 37 - 38 – 7.5: Would expect to see detailed drainage strategy as part of application including how surface water run off is dealt with to minimise discharge into public sewer.</p>
Sustainability and Renewal	<p>S&R would like to comment on the following area descriptions that will be contained in the Environmental Statement EIA Vol 1 – 3; Climate Change (including building overheating), Construction Waste, Ecology and Water Resources.</p> <p>Potential Environmental Impacts / Likely Effects</p> <p>1. Climate Change S&R would like to see the Energy Statement for the development include details of how the site will fit to the Mayor of London's Policy to implement the Energy Hierarchy as initially proposed in the scoping report.</p> <p>Energy Efficiency (Be Lean) If the planning permission is issued before the 1st October 2016 then S&R would expect the site as a whole to achieve a 35% reduction in Carbon Dioxide Emissions and all units to achieve a minimum of 35% reduction in Carbon Emission in order to adhere to the London Plan Policy 5.2. S&R expect adequate baselines to be calculated that the reductions will be taken from. If the planning permission is submitted after October 1st the developer would be expected to achieve a Zero Carbon Build and residence. S&R would expect the commercial space measuring 3,500 m2 to achieve BREEAM Excellence rating. S&R would expect the developer to produce a Design Stage Assessment and a specialised Civil Engineering Design Stage Assessment.</p> <p>S&R would expect an Over Heating Risk Assessment to be undertaken to ensure that any in energy efficiency methods applied are not too severe for the summer months.</p> <p>Decentralised Energy (Be Clean) Given the number of proposed dwellings S&R would expect a District Heat Network to be considered in the Environmental Statement. The most likely option would be a Combined Heat and Power Network including looking</p>

into the viability of heat source options such as River Source heat pump. S&R would like a Measure and Verification plan to be added to the Environmental Statement if a Combined Heat and Power facility is found to be viable including details of the energy centre location, pipe work drawings and flue arrangements. The development must provide evidence that the proposed Heat Network has been designed to allow for future connection to any neighbouring heating and cooling system.

Renewables Energy (Be Green)

S&R is satisfied that the developer has outlined the desire to use low carbon technology on-site but would request that 20% of the total Carbon Reduction achieved should come from Renewable technology. S&R would also expect a management and services plan to be produced to accompany any proposed renewable technology implemented.

Non-Significant Issue

1. Waste (Construction)

S&R is happy that the developer plans to undertake a low carbon construction process and as part of this would like to see the potential construction site energy consumption noted in the total carbon output records. S&R would also expect the developer to produce a complete a Site Waste Management Plan before work commences in order to adhere to the Greener Greenwich SPD.

Given the location of the site S&R would like to request that the developer considers having construction materials delivered by river rather than road.

2. Ecology

S&R note that a Phase 1 Habitat survey has been undertaken and that the results of this suggested the site was of low ecological value and so there will not be an Ecological Chapter included in the Environmental Statement. However seen as there will still be Ecological Impact Assessment undertaken, S&R would like further clarification as to the benefits of not including this in the Environmental Statement. S&R would like to see a copy of the report accompanying the Phase 1 habitat survey that has already been undertaken.

S&R would normally expect a development site of this size to undertake a full Ecological Assessment of the site and the surrounding area that would be scoped into the Environmental Statement.

In any case S&R would expect the developer to undertake measures to ensure there is a net gain of biodiversity resulting from the Green Infrastructure of this development. S&R would expect such strategies as a Green Roof and implementation of native species of trees / pollen producing plants.

3. Water Resources

S&R would expect the development to at the very least meet the London Plan requirement of water usage of 110 litres per usage per day. S&R is satisfied that the developer will develop Sustainable Drainage and would suggest incorporating plans such as Green Roofs. S&R would also suggest ensuring a large scale use of rainwater for non-potable uses.

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