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Your Ref:

20 September 2018

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Dear Connaire

**DEMOLITION OF EXISTING CAR WASH AND PET HOSPITAL AND ANY ASSOCIATED STRUCTURES AND THE RE-DEVELOPMENT OF THE SITE FOR A RESIDENTIAL-LED MIXED USE DEVELOPMENT, INCLUDING BUILDINGS RANGING FROM 3 TO 17 STOREYS, COMPRISING A RE-PROVIDED PDSA PET HOSPITAL (D1) FLOORSPACE, 272 NEW HOMES, FLEXIBLE A1/A2/A3//A4/B1/D1/D2 COMMERCIAL FLOORSPACE, CAR PARKING SPACES, CYCLE PARKING, HARD AND SOFT LANDSCAPING MEASURES INCLUDING PLAYSPACE PROVISION AND REFUSE AND RECYCLING FACILITIES
1A AND 1C EYNHAM DRIVE, LONDON, SE2, 9RQ**

We write on behalf of Abbey Wood Property Ltd and further to the submission of planning application 17/4080/F at 1A and 1C Eynsham Drive, London, SE2 9RQ for the following proposed development:

Demolition of existing car wash and pet hospital and any associated structures and the re-development of the site for a residential-led mixed use development, including buildings ranging from 3 to 17 storeys, comprising re-provided PDSA pet hospital (D1) floorspace, 272 new homes, flexible A1/A2/A3/A4/B1/D1/D2 commercial floorspace, car parking spaces, cycle parking, hard and soft landscaping measures including playspace provision and refuse and recycling facilities.

Background

On the 9th July 2018 the Royal Borough of Greenwich Strategic Planning Board resolved to refuse planning permission for the above proposed development for the following reasons:

Reason 1

The proposed development represents overdevelopment of the site by reason of its density, height, scale and massing, and would fail to complement the character and appearance of the street scene, surrounding area, and would cause less than substantial harm to the setting of Lesnes Abbey which is a scheduled ancient monument and Grade II Listed Building. This harm is not outweighed by the public benefits of the

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scheme. As such the proposal is contrary to the NPPF, policies 7.4, 7.6, 7.7 and 7.8 of the London Plan (2016) and policies H2, H5, DH1, DH3 and DH(i) of the Council's Core Strategy with detailed Policies (2014)

Reason 2

The proposed development due to its height, scale, orientation and relationship with adjoining properties would result in a loss of residential amenity for the occupiers of Thistlebrook Estate to the south in terms of loss of privacy due to overlooking contrary to Policy 7.6 of the London Plan (2016) and Policies DH1 and DH(b) of the Royal Greenwich Local Plan Core Strategy with detailed policies (2014).

Reason 3

The proposed development due to the lack of appropriate private and communal amenity spaces would result in the creation of a poor living environment for prospective occupiers contrary to Policy 7.6 of the London Plan (2016) and Policies DH1 and H5 of the Royal Greenwich Local Plan: Core Strategy with detailed policies (2014).

On the 13th August 2018 pursuant to section 2A of the Town and Country Planning Act 1990 (as amended) and in accordance with the Town and Country Planning (Mayor of London) Order 2008, the Mayor directed that he would act as the local planning authority for the purpose of determining planning application 17/4080/F.

Following call in, and as part of on-going discussions, it was agreed between both the applicant and GLA Officers that a number of amendments would be made to the scheme, with a view to addressing as far as possible, the stated reasons for refusal.

The amendments to the scheme seek to directly address comments raised by the RBG Planning Board and the above detailed reasons for refusal. Full details of the amendments are set out in detail in Table 1 of this letter.

Submission Documents

As a result of the above detailed amendments to the proposed scheme, the following relevant submission documents have been updated and are submitted for Officer's consideration:

- Cover letter;
- Updated planning application form;
- Updated CIL form;
- Design and Access Statement (including Landscape Strategy) addendum;
- Transport Statement addendum;
- Energy Statement addendum;
- Landscape and Townscape Visual Impact Assessment addendum;
- Flood Risk Assessment addendum;
- Land Contamination Report addendum;
- Health Impact Statement addendum;
- Air Quality Assessment addendum;
- Letter confirming required environmental report addendum scope;
- Letter confirming no requirement for Construction Management Plan addendum;
- Area Schedule;
- Drawing List;
- Suite of updated drawings as follows:
 - Location Plan (ref: A2874 001 R12)
 - Location Plan (emerging context) (ref: A2874 002 R12)

- o Existing Site Plan (ref: A2874 100 R12);
- o Emerging Site Plan (ref: A2874 101 R12);
- o Proposed Alterations Plan (ref: A2874 102 R12);
- o Existing Ground Floor Plan (ref: A2874 103 R12);
- o Existing Roof Plan (ref: A2874 104 R12);
- o Existing Section (ref: A2874 130 R12);
- o Existing Elevations A and B (ref: A2874 140 R12);
- o Existing Elevations C and D (ref: A2874 141 R12);
- o Proposed Basement Floor (ref: A2874 200-1 R20);
- o Proposed Ground Floor (ref: A2874 200 R20);
- o Proposed First Floor Plan (ref: A2874 201 R20);
- o Proposed Second Floor Plan (ref: A2874 202 R20);
- o Proposed Third Floor Plan (ref: A2874 203 R20);
- o Proposed Fourth Floor Plan (ref: A2874 204 R20);
- o Proposed Fifth Floor Plan (ref: A2874 205 R20);
- o Proposed Sixth Floor Plan (ref: A2874 206 R20);
- o Proposed Seventh Floor Plan (ref: A2874 207 R20);
- o Proposed Eighth Floor Plan (ref: A2874 208 R20);
- o Proposed Ninth Floor Plan (ref: A2874 209 R20);
- o Proposed Tenth Floor Plan (ref: A2874 210 R20);
- o Proposed Eleventh Floor Plan (ref: A2874 211 R20);
- o Proposed Twelfth Floor Plan (ref: A2874 212 R20);
- o Proposed Thirteenth Floor Plan (ref: A2874 213 R20);
- o Proposed Fourteenth Floor Plan (ref: A2874 214 R20);
- o Proposed Fifteenth Floor Plan (ref: A2874 215 R20);
- o Proposed Sixteenth Floor Plan (ref: A2874 216 R20);
- o Proposed Roof Plan (ref: A2874 217 R20);
- o Proposed Phasing Plan (ref: A2874 290 R20);
- o Proposed Sectional Elevation 1 (ref: A2874 300 R20);
- o Proposed Sectional Elevation 2 (ref: A2874 301 R20);
- o Proposed Sectional Elevation 3 (ref: A2874 302 R20);
- o Proposed Sectional Elevation 4 (ref: A2874 303 R20);
- o Proposed Sectional Elevation 5 (ref: A2874 304 R20);
- o Proposed Sectional Elevation 6 (ref: A2874 305 R20);
- o Proposed Sectional Elevation 7 (ref: A2874 306 R20);
- o Proposed Sectional Elevation 8 (ref: A2874 307 R20);
- o Proposed North Elevation (ref: A2874 400 R20);
- o Proposed East Elevation (ref: A2874 401 R20);
- o Proposed South Elevation (ref: A2874 402 R20);
- o Proposed West Elevation (ref: A2874 403 R20);

Proposed Amendments to Address Royal Borough of Greenwich Comments

The following section details how the proposed development has been amended to address the reasons for refusal set out by RBG and, comments raised by GLA Officers following call in.

Table 1: Summary of Amendments

Agreed Amendment	Summary of Amendment
Reason for Refusal 1	Reason for refusal no.1 stated that the proposed development represents overdevelopment of the site by reason of its density, height, scale and massing, and would fail to complement the character and appearance of the street scene, surrounding area, and would cause less than substantial harm to the setting of Lesnes Abbey which is a scheduled ancient monument and Grade II Listed Building. This harm is not outweighed by the public benefits of the scheme. As such the

	<p>proposal is contrary to the NPPF, policies 7.4, 7.6, 7.7 and 7.8 of the London Plan (2016) and policies H2, H5, DH1, DH3 and DH(i) of the Council's Core Strategy with detailed Policies (2014)</p> <p>Notwithstanding the above reason for refusal, it is the applicant's position that the proposed scale and massing of the development remains acceptable.</p> <p>It is first relevant to note that the application site is located within a designated Opportunity Area, within which tall buildings are directed in accordance with London Plan Policy 7.7.</p> <p>Furthermore, the proposed development has been informed by the emerging Thamesmead Estate proposals, which form the future townscape context within which the proposed development will be viewed.</p> <p>The emerging townscape context is one of tall buildings, with buildings of up to 57.7m in height (circa. 17 storeys) located within proximity to the application site.</p> <p>The proposed development would act as a landmark and way finder building on the roundabout of Harrow Manor Way, forming a gateway leading towards Abbey Wood Train Station and, would appear in keeping with the surrounding Thamesmead Estate development.</p> <p>Therefore, the scheme remains the same as originally submitted in terms of scale, massing and height, given that it would accord with London Plan policy 7.7 and would complement the emerging townscape character.</p>
<p>Reason for Refusal 2</p>	<p>Reason for refusal no2. stated that the proposed development due to its height, scale, orientation and relationship with adjoining properties would result in a loss of residential amenity for the occupiers of Thistlebrook Estate to the south in terms of loss of privacy due to overlooking contrary to Policy 7.6 of the London Plan (2016) and Policies DH1 and DH(b) of the Royal Greenwich Local Plan Core Strategy with detailed policies (2014).</p> <p>The previously proposed development comprised a mixed native species hedgerow along the southern boundary of the site. It is the applicant's position that the previous boundary treatment and the associated relationship between the proposed development and the Thistlebrook Estate was acceptable for the following reasons:</p> <ul style="list-style-type: none"> • The dwellings at the Thistlebrook Estate are mobile homes that can be repositioned and re-orientated should the occupants consider there to be any perceived unacceptable degree of overlooking from the proposed development. • The primary windows serving habitable rooms for the mobile homes located closest to the proposed development are orientated in an east / west direction and therefore there would be no direct overlooking from windows in the proposed development, which is located to the north. • Of the limited number of mobile homes with windows facing the proposed development, these are located within proximity

	<p>to the existing fence and as such look directly upon that fence, rather than the application site.</p> <p>Notwithstanding the above, following discussions with GLA Officers it was agreed that an enhanced boundary treatment could be provided in this location, which would prevent views into existing windows on the neighbouring mobile homes at the Thistlebrook Estate.</p> <p>As a result the proposals now comprise a brick wall with climbers for the southern boundary treatment. The brick wall would be taller than the previously proposed hedgerow and consequently would prevent the above identified views.</p>
Reason for Refusal 3	<p>Reason for refusal no.3 stated that the previously proposed development, due to the lack of appropriate private and communal amenity spaces would result in the creation of a poor living environment for prospective occupiers contrary to Policy 7.6 of the London Plan (2016) and Policies DH1 and H5 of the Royal Greenwich Local Plan: Core Strategy with detailed policies (2014).</p> <p>The previously proposed development comprised a total of 857sqm of playspace, with a 108sqm sand pit acting as 'doorstep playable space' on the northern terrace of Building B.</p> <p>Following discussions with GLA Officers, it was agreed that the doorstep playable space provision should be better distributed between both market and affordable housing units within the development.</p> <p>As a result the playspace strategy now proposes 985sqm of playspace, of which 545sqm doorstep playable space is distributed across Buildings B, C and the communal podium garden.</p> <p>Furthermore, the playspace strategy has also been revised to better define the areas of play for various age ranges.</p> <p>It is considered that the revised playspace strategy will now ensure that all residents will have access to a range of high quality playspace within the development.</p>
GLA Comments – Revised Landscaping Strategy	<p>The previously proposed development comprised an area of Grasscrete as part of the parking area to the north of the site.</p> <p>Although not a specified reason for refusal, following discussions with GLA Officers, it was agreed that the Grasscrete should be removed and replaced with a higher quality material.</p> <p>As a result the proposals now comprise resin bound gravel in place of the previously proposed Grasscrete, which is considered to be in keeping with the wider hard landscaping strategy for the proposals.</p>
GLA Comments - Increased Activation of Southern Ground Floor Frontage	<p>The previously proposed development comprised 4no. townhouses, a bin store, cycle store and substation at ground floor along the southern elevation, along with an access to the carpark.</p> <p>Although not a specified reason for refusal, following discussions with GLA Officers it was agreed that the ground floor southern frontage could be better activated as a result of an amended layout.</p>

	<p>The proposals now comprise (in addition to the 4no. townhouses), 4no. duplex apartments, bin stores and substation along the southern frontage and an additional duplex apartment on the south western corner between the southern frontage and western frontage.</p> <p>It is considered that the amended layout will lead to increased levels of pedestrian activity in this location and accordingly, better activation of the ground floor southern frontage.</p>
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Review of Key Planning Considerations as a Result of the Amendments

The remainder of this letter sets out the relevant key planning considerations in relation to affordable housing, dwelling mix, density, transport and playspace, as a result of the amendments to the proposals. It is considered that all other key considerations are addressed in the originally submitted planning statement and submission documents.

Affordable Housing

With regard to affordable housing, the Mayor's Affordable Housing and Viability SPG sets out a fast track route for schemes providing 35% or greater affordable housing provision. It adds that such schemes are not required to submit a viability assessment providing they are consistent with the relevant tenure split, are providing on site affordable housing and meeting other obligations where relevant. The SPG states that a tenure split of 30% low cost rent, 30% intermediate and 40% to be determined by the Council will be required.

Further to the above, Core Strategy **Policy H3 'Affordable Housing'** states that developments of 10 or more homes will be required to provide at least 35% affordable housing (by unit).

The previously proposed scheme comprised the following affordable housing contribution:

- 95 affordable housing units – equating to 35% provision;
- 268 habitable rooms within the affordable housing units – equating to 36.56% provision;
- A tenure split of 70% social rented accommodation and 30% intermediate/shared ownership by unit;
- A tenure split of 75% social rented accommodation and 25% intermediate/shared ownership by habitable room.

Following the above detailed amendments, the proposed development now comprises:

- 95 affordable housing units – equating to 35% provision;
- 285 habitable rooms within the affordable housing units – equating to 37.2% provision;
- A tenure split of 70% social rented accommodation and 30% intermediate/shared ownership by unit;
- A tenure split of 75% social rented accommodation and 25% intermediate/shared ownership by habitable room.

The affordable housing offer has therefore increased as part of the revised scheme and continues to be in excess of 35%, in accordance with both the Mayor's Housing and Viability SPG and Policy H3.

The applicant has also expressed a willingness to increase the affordable housing offer up to a maximum of 40% should GLA grant funding be available and subject to the detailed heads of terms within any forthcoming Section 106 agreement.

Dwelling Mix

Core Strategy **Policy H2 'Housing Mix'** states that a mix of housing types and sizes will be required in all developments and should contain a proportion of 3, 4 and 4+ bedroom units. It adds that 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 the level of accessibility to public transport.

The previously proposed scheme comprised the following dwelling mix:

Dwelling Type	No.	%
Studio	3	1%
1 bed	109	40%
2 bed	132	49%
3 bed	28	10%

Following the above detailed amendments, the proposed development now comprises the following dwelling mix:

Dwelling Type	No.	%
Studio	3	1%
1 bed	106	39%
2 bed	132	49%
3 bed	30	11%
4 bed	1	0%

In this regard it is relevant to note that the overall provision of 3 bedroom accommodation has increased from 10% to 11% and, that the additional 3 bedroom accommodation comprises and additional 2no. social rented units within the affordable housing contribution.

Given that RBG Officers had previously supported the original dwelling mix, based in part on the site's PTAL rating and good connections to central London, it is considered that the currently proposed mix can only be seen as a further improvement, particularly in terms of the affordable housing element of the scheme.

The proposals are therefore considered to accord with Policy H2.

In terms of wheelchair units, the previously proposed development comprised:

Wheelchair Unit Type	No.	%
Studio	0	0%
1 bed	11	41%
2 bed	11	41%
3 bed	5	19%

Following amendments to the proposed layout of the development, the following wheelchair provision is proposed:

Wheelchair Unit Type	No.	%
Studio	0	0%
1 bed	14	52%
2 bed	10	37%
3 bed	3	11%

The above amendments result in an increase in 1 bedroom wheelchair unit provision and a more even distribution of wheelchair units overall, which is considered to be an improvement to the dwelling mix proposed.

Density

London Plan **Policy 3.4 'Optimising Housing Potential'** states that development should optimise housing output for different types of locations within the relevant density range shown in Table 3.2 of the London Plan.

With reference to Table 3.2, the application site has an indicative density threshold of 200-700 habitable rooms per hectare.

The development as originally proposed comprised the following density:

- 447 units per hectare; and
- 1,207 habitable rooms per hectare.

As a result of the above detailed amendments to the scheme, the proposals now comprise a density of:

- 447 units per hectare; and
- 1259 habitable rooms per hectare

With regard to Table 3.2 of the London Plan, it is relevant to note:

- The London Plan density ranges are guidelines and should not be applied mechanistically to restrict the development potential of a site;
- The site is located within an Opportunity Area and therefore, housing output should be optimised in accordance with the London Plan;
- The proposed development is of an exceptional design quality and affords future residents a very high level of amenity both public and private, including landscaped gardens and playspace provision;
- The proposals are also reflective of the emerging townscape context, which is one of higher density development and apartments.

Given the above and the flexibility that is to be afforded in the application of the indicative density thresholds contained within the London Plan, it is considered that the proposals are acceptable in terms of proposed density.

Transport

London Plan **Policy 6.13 'Parking'** states that the maximum standards set out in Table 6.2 of the London Plan should be the basis for considering planning applications. It adds that 1 in 5 spaces (both active and passive) must provide an electrical charging point.

The development as originally proposed comprised the follow car parking provision:

- 28 PDSA hospital spaces;
- 2 commercial spaces;
- 2 car club spaces;
- 27 residential accessible spaces.

Following consultation with GLA Officers and in order to facilitate the enhanced activation of the southern ground floor frontage, the revised scheme comprises the following car parking provision:

- 28 PDSA hospital spaces;
- 2 commercial spaces;
- 2 car club spaces;
- 17 residential accessible spaces.

The revised level of disabled car parking provision for the residential element of the scheme is considered to accord with Policy 6.13. In this regard it is relevant to note that the London Plan states that 'adequate parking spaces for disabled people must be provided', however no strict criteria are set.

Further to the above, a disabled car parking demand assessment was undertaken as part of the originally submitted Transport Assessment. The assessment demonstrated that the likely peak demand for wheelchair parking would be 15 spaces. Therefore the revised level of provision is considered to be acceptable.

Playspace

The Mayor's Play and Informal Recreation SPG and the associated play space requirement calculator are used to calculate the required level of playspace provision.

As set out within Table 1 above, the overall level of playspace provision has been increased within the proposed development such that it exceeds the requirements of the Mayor's SPG. On this basis it is considered that the proposals are acceptable in this regard.

Submission of Updated Reports

This submission comprises a range of updated plans and addendums to environmental reports following the refusal of planning permission for planning application 17/4080/F on the 9th July 2018 by the RBG Planning Board and, following a meeting on the 26th July 2018 and on-going discussions with GLA Officers.

The proposed amendments to the scheme have sought to address as far as possible the stated reasons for refusal provided by the RBG and comments raised by GLA Officers.

The submission documents demonstrate that there are limited to negligible material changes to the conclusions previously reached by the originally submitted environmental reports. As such, we consider that the proposed development continues to accord with all relevant National and local planning policies.

Benefits

For the reasons set out within this letter, supporting addendums and previously submitted documentation, it is considered that the proposed development is acceptable and would accord with all relevant National and local planning policy requirements. Notwithstanding this, the proposed development would also deliver the following range of benefits:

- The removal of low grade, visually unattractive buildings and replacement with a scheme of a high quality design which will contribute to the regeneration of the area;
- Re-provision of the PDSA Pet Hospital with enhanced facilities to ensure its long term future;
- Provision of 272 new homes of a range of sizes through the redevelopment of a brownfield site;
- 35% affordable housing, equating to 95 dwellings, including social rented and intermediate accommodation;
- 207sqm (GIA) of high quality flexible commercial space;
- 16-26 jobs generated at the site by virtue of the increased provision of commercial floorspace. Notwithstanding the jobs re-provided at the PDSA Pet Hospital;

- Attractive communal landscaped area, including playspace provision;
- Creation of construction jobs;
- S106 contributions;
- Mayoral and Borough CIL contributions towards local infrastructure.

Given the above we respectfully request that planning permission is granted.

We trust that you have sufficient information to consider the proposals, but please do not hesitate to contact us should you require any further details.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A. Shepherd', written in a cursive style.

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For and on behalf of GVA Grimley Limited