

Jillian Holford  
 Planning Division  
 Royal Borough of Greenwich  
 Wellington Street  
 Woolwich  
 SE18 6HQ

Dear Jillian,

**AMENDMENTS TO THE PROPOSED CHARLTON RIVERSIDE SCHEME,  
 SUBMITTED UNDER FULL PLANNING APPLICATION 16/4008/F –  
 IMPLICATIONS FOR ENVIRONMENTAL IMPACT ASSESSMENT**

Date 21/02/2018

We write to you on behalf of our client, Leopard Guernsey Anchor Propco Limited (hereafter referred to as the 'Applicant'), with regard to proposed amendments to the Charlton Riverside Scheme at Anchor and Hope Lane, Charlton (the application site) (hereafter referred to as the 'February 2018 application'). A full planning application (Ref: 16/4008/F) was first submitted to the Royal Borough of Greenwich (RBG) in December 2016. Subsequent design evolution occurred, and these alterations were submitted to the RBG in December 2017 under the same planning application (hereafter referred to as the 'December 2017 proposed development'). The application is currently yet to be determined by the RBG.

Ramboll  
 Artillery House  
 11-19 Artillery Row  
 London  
 SW1P 1RT  
 United Kingdom

T +44 20 7808  
 1420www.ramboll.co.uk

Ref L1700001114\_2

The December 2016 was subject to a full Environmental Impact Assessment (EIA). An updated Environmental Statement (hereafter referred to as the 'December 2017 ES') was subsequently produced to reflect the design evolution of the scheme, and accompanied the revised application in December 2017.

The February 2018 application is seeking to amend the December 2017 proposed development; however, the conclusions of the December 2017 ES are not changed by the February 2018 application. It is not, therefore, proposed to repeat the EIA for the February 2018 application, and this letter together with the February 2018 ES should be treated as the "*relevant environmental information*" when determining the February 2018 application.

**1. Background**

The revised application, which was accompanied by the December 2017 ES, sought approval for the residential-led, mixed use redevelopment of the application site. This would involve the demolition of existing buildings and the erection of eleven buildings (up to ten storeys in height), providing residential

Ramboll Environment and Health UK Limited  
 Registered in England  
 Company No: 2331163  
 Registered Office:  
 Artillery House  
 11-19 Artillery Row  
 London  
 SW1P 1RT

units, as well as flexible business, retail, restaurant, community and leisure space at the ground and first floor levels. Provisions for pedestrian access, open space and landscaping, associated car and cycle parking, refuse and recycling storage, plant and all other associated works, were also set forward as part of the December 2017 proposed development.

The quantum of the proposed land uses for the December 2017 proposed development comprises (in Gross Internal Area (GIA)):

- 771 residential units;
- 3,236 m<sup>2</sup> of flexible business/retail/restaurant/café/leisure use;
- 496 m<sup>2</sup> of flexible community/leisure use;
- 337 m<sup>2</sup> of community space for use as a creche;
- Up to 1,323 residential and commercial cycle spaces; and
- Two basements, providing up to 210 car parking spaces.

The outcomes of the EIA were reported in the December 2017 ES.

## **2. Purpose of this Letter**

This letter serves to provide information on the environmental implications of the proposed amendments sought by the February 2018 application by reference to the December 2017 ES.

The information is based on updated qualitative assessments that have been undertaken by the EIA team to report on the environmental effects of the December 2017 proposed development, as amended by the proposed amendments being sought in the February 2018 application (hereafter referred to as the 'February 2018 amended proposed development'). The information serves to confirm whether any new or amended environmental effects would arise. Accordingly, reference has been made to the conclusions of the December 2017 ES throughout this letter and this letter should be read in conjunction with the December 2017 ES.

## **3. Proposed Amendments**

The Applicant proposes to make amendments to the December 2017 proposed development prior to its determination by the RBG. The amendments sought are in respect of the building heights, fenestration and balconies of the proposed development. In addition, the February 2018 amended proposed development would result in a slight alteration to the residential unit mix. No amendments are being sought regarding total floorspace area. The proposed amendments comprise the following:

- Reduction in height of Building H adjacent to Atlas Gardens by 2 storeys to ensure a maximum of three storeys with a fourth story set-back;
- Increase in height to Buildings C, E and F by 1 storey;
- Amendments to the residential unit mix, with one less 2-bed unit and one addition 1-bed 1 person unit.
- Amendments to the window locations to address potential overlooking between the following buildings:
  - Buildings B and C;
  - Buildings D and E&F;

- Buildings G and H;
- Buildings J and K&L; and
- Buildings J and M&N.
- Amendments to balcony locations on Building C to provide loggias and increase the building depth by 600 mm; and
- Amendments to balcony treatment to provide privacy screens for Buildings A and J.

Although amendments to the residential unit mix are proposed, the total number of residential units would remain consistent with that of the December 2017 proposed development. Building H would comprise 20 less residential units, and these would be redistributed, with Building C increasing by 8 units, and Building E&F increasing by 12 units.

No alteration to the proposed development summary would arise in light of the proposed amendments set out in the February 2018 application. Therefore, the summary of the February 2018 amended proposed development is as stated above.

### **3.1 Servicing, Drainage, Ventilation, Energy and Waste**

Given the limited nature of the changes proposed, the servicing, drainage, ventilation, energy and waste strategies for the February 2018 amended proposed development remain the same as for the December 2017 proposed development. The distance from the bin stores to the refuse vehicle bays in front of Buildings G and H have been reduced to align with the RBG policies however this would not have an effect on the assessments within the ES. The existing servicing strategy would be able to accommodate for the redistribution of residential units from Building H to Building C and Building E&F.

### **3.2 Demolition and Construction**

With respect to the proposed amendments, the demolition and construction stage, the programme, methods of construction and overall phasing would not be altered for the February 2018 amended proposed development when compared against the December 2017 proposed development. Demolition and construction effects have therefore not been considered further.

### **3.3 Cumulative Schemes**

No additional cumulative schemes have been brought forward since the production of the December 2017 ES. Consequently, inter-project cumulative effects have therefore not been considered further.

## **4. Policy and Assessment Methodology Context**

No additional or updated policies or methodologies have been brought forward since December 2017 on either a national or local level which would have an implication on the December 2017 ES.

## **5. Baseline Conditions**

Baseline conditions at the application site have not changed since the December 2017 ES. As a result, the baseline considered in the December 2017 ES, is considered to remain valid for the purposes of the February 2018 application.

## 6. Summary and Analysis of Environmental Effects

Given the limited nature of the proposed amendments, the specialist teams have considered the likely significant effects of the February 2018 amended proposed development by reference to the December 2017 ES, to identify whether any of the results would now be different.

The EIA specialists have confirmed that there would be no material implications for the environmental topics considered within the February 2017 ES as a result of this February 2018 application. The conclusions of our review are summarised below.

### 6.1 Socio-economic

The February 2018 amended proposed development does not include changes to the total commercial floorspace. The operational employment figures would therefore remain consistent with that stated in the December 2017 ES. It is proposed that there would be a slight amendment to the residential unit mix by one less 2-bed unit and one additional 1-bed unit which would result in a very limited or no change to the population yield. Given the small nature of this amendment; however, it is not anticipated that this would result in a material implication in regard to socio-economics. Therefore, there would be no significant alterations to the expected demand on community infrastructure as the February 2018 amended proposed development would result in an imperceptible change to the population generation. Accordingly, the conclusions of the December 2017 ES remain valid for the February 2018 amended proposed development.

### 6.2 Transport

The February 2018 amended proposed development does not include proposals to amend the total floorspace. The employment forecasts would therefore remain consistent with that stated in the December 2017 ES. It is proposed that there would be a slight amendment to the residential unit mix without altering the overall number of residential dwellings. However, given the nature of this amendment, it would not have any impact or result in any material implication in regard to transport. No alterations are proposed towards the level of car or cycle parking. Consequently, there would be no alterations to the overall trip generation or modal split of trips, and therefore no alterations to forecast traffic flows. There are insignificant alterations to the on-site public realm, traffic and servicing routes which have not affected the movement of people or vehicles within the proposed development. Accordingly, the conclusions of the December 2017 ES remain valid for the February 2018 amended proposed development.

### 6.3 Air Quality

The February 2018 amended proposed development does not include proposals to amend the car or cycle space provision and there would be no alterations to trip generation or traffic flow. Moreover, no changes to the ventilation or energy strategies have been proposed. Amendments to the building heights, fenestration and balconies are not considered to have material implications on the conclusions of the air quality chapter of the December 2017 ES.

In addition, as both trip generation and building emissions would remain unchanged from the values stated in the December 2017 ES, these would continue to fall within the Benchmark values for the amended proposed development and can be considered Air Quality Neutral. Likewise, given the small

nature of the proposed amendments, the amended proposed development would still be considered as suitable for its proposed intended uses in respect of air quality.

Accordingly, the conclusions of the December 2017 ES remain valid for the February 2018 amended proposed development.

#### **6.4 Noise and Vibration**

The February 2018 amended proposed development does not include proposals to amend the car or cycle space provision and there would be no alterations to trip generation or traffic flow. Moreover, no changes to the ventilation or energy strategies have been proposed. Amendments to the building heights, fenestration and balconies, are not considered to have material implications on the conclusions of the noise and vibration chapter of the December 2017 ES.

Likewise, given the small nature of the proposed amendments, the amended proposed development would still be considered as suitable for its proposed intended uses in respect of noise and vibration. Accordingly, the conclusions of the December 2017 ES remain valid for the February 2018 amended proposed development.

#### **6.5 Archaeology**

The February 2018 amended proposed development does not include proposals to amend below the ground level or excavation/ground reduction works. Accordingly, the conclusions of the December 2017 ES remain valid for the February 2018 amended proposed development.

#### **6.6 Daylight, Sunlight, Overshadowing & Solar Glare**

The February 2018 amended proposed development includes proposals to amend the building heights of Buildings C, E&F and H. It is proposed that Building H would be reduced in height by two storeys, whilst Building C and Building E&F would be increased in height by one storey each. Moreover, adjustments to the fenestration and balconies have been proposed. Although the proposed amendments may slightly alter the daylight, sunlight and overshadowing assessment within the December 2017 ES, this change is not considered likely to propose a significant effect. Further testing will be provided at a later stage of the application process in order to determine the full implication, if any, of the February 2018 amended proposed development, on the application site and surrounding sensitive receptors.

Additionally, the proposed amendments would not affect the solar glare assessment presented within the ES and as such will not require retesting.

#### **6.7 Wind Microclimate**

The February 2018 amended proposed development includes proposals to amend the building heights of Buildings C, E&F and H. It is proposed that Building H would be reduced in height by two storeys, whilst Building C and Building E&F would be increased in height by one storey each. Moreover, adjustments to the balconies have been proposed.

The slight increase in height proposed for Building C and Building E&F may increase channelling winds between these buildings. However, the wind conditions were shown to be generally calm for the intended use in the December 2017 ES and therefore even if the February 2018 amended proposed development leads to a slight increase in wind speeds at these locations, suitable wind conditions for the

intended use would still prevail. As the terraces at Building C and Building E&F are below the sitting threshold by a suitable margin, it is anticipated that the increase in building height would not result in a material implication.

Accordingly, the conclusions of the December 2017 ES remain valid for the February 2018 amended proposed development.

### **6.8 Townscape, Visual and Heritage**

The February 2018 amended proposed development includes proposals to amend the building heights of Buildings C, E&F and H. It is proposed that Building H would be reduced in height by two storeys, whilst Building C and Building E&F would be increased in height by one storey each. Moreover, adjustments to the fenestration and balconies have been proposed.

The adjustments to the fenestration and balconies are at a level of detail that would have no significant effect in townscape, visual and heritage terms.

The effect of the massing changes would be most notable in view 2 from Atlas Gardens. The decrease in the height of Building H would result in it no longer being visible in this view, while Building E&F (behind Building H) would become more visible. Overall, the magnitude, significance of effect and qualitative nature of effect in this view would be unchanged. There would be minimal change as a result of these massing amendments in the nearby view 3, from Derrick Gardens, and the overall effect in this view would also be unaltered.

While the increase in the height of Buildings C, E and F would increase visibility of these buildings in some other views, this would be to a minor extent, and with no effect on the overall assessments of effect for those views. Therefore, there would be no change in the assessment of effects for any views as a result of the amended proposed development. There would also be no change to overall townscape and heritage effects.

In summary, the proposed amendments are relatively minor in visual terms and in the context of the amended proposed development overall. It is considered that, while the visibility and appearance of the amended proposed development would alter in some views, there would be no change to the overall effect of the amended proposed development in those views. Similarly, there would be no change to the overall assessment of effects in respect of townscape character areas and heritage assets. There would therefore be no material implications that would arise in respect of townscape, visual and heritage. Accordingly, the conclusions of the December 2017 ES remain valid for the February 2018 amended proposed development.

### **6.9 Intra-Project Cumulative Effects Assessment**

As there have been no changes to the conclusions of the environmental effects for each of the environmental topics discussed above, the intra-cumulative effects of the February 2018 amended proposed development would remain as presented in the December 2017 ES.

## **7 Residual Effects**

The residual effects, conclusions and summary of the December 2017 ES would remain valid for the February 2018 amended proposed development. Consequently, no further assessment needs to be carried out or mitigation measures recommended.

## 8. ES Non-Technical Summary

In line with the conclusions stated within each environmental topic, there will be no changes to the residual effects or assessments undertaken as part of the December 2017 ES and therefore the Non-Technical Summary of the December 2017 ES would remain unchanged.

## 9. Conclusion

Given the small scale and nature of the amendments proposed through the February 2018 amended proposed development, when compared against the December 2017 proposed development, it is not predicted that the assessment of environmental topics considered as part of the December 2017 ES would be materially altered and shown to give rise to new or amended significant environmental effects.

Therefore, the December 2017 ES remains valid for the February 2018 amended proposed development and further assessment is not required for the proposed amendments relating to the February 2018 application.

Yours sincerely



**Michael Elliott**

Senior Managing Consultant  
Environmental Planning Practice

D +44 (0)1225 748436  
M +44 (0) 7976 643414  
melliott@ramboll.com