

Development Management Delegated Report



**Directorate of Regeneration,
Enterprise & Skills**
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

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| Case Ref No: | 20/0362/EIA |
| Application Type: | Environmental Impact Assessment |
| Location: | ARMOURER'S COURT, WOOLWICH CROSSRAIL STATION SITE, ARSENAL WAY, WOOLWICH, SE18 |
| Ward: | WOOLWICH RIVERSIDE |
| Proposal: | Scoping Opinion under Regulation 15 of the Town and Country Planning (EIA) Regulations 2017 for a mixed use development comprising up to approximately 515 residential units and approximately 1000sqm non-residential floor space (Use Classes A1-A4, B1, D1 and D2) in a series of buildings up to 26 storeys plus plant surrounding a central landscaped podium with associated car parking, access, servicing and landscaping. |

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| Recommendation | Approve | | |
| Expiry Date | 06/03/2020 | EOT | |

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| Case Officer | Matthew Durling | Date: | 06 March 2020 |
| Report Agreed By | | Date: | |
| Authorising Officer's Signature | | Date: | |

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|---------------------------|------------------------|-------------------|-----|
| Listed Building: | No | Flood Zone | N/A |
| Conservation Area: | ROYAL ARSENAL WOOLWICH | | |
| CIL Liable | No | LDD | NO |

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|---------------------|-----|----------------|---|
| Site Notice | N/A | | |
| Press Notice | N/A | | |
| Objections | 0 | Support | 0 |
| Comments | 15 | | |

Site Description and Surroundings:

1. The application site comprises 0.84 hectares and is bounded by Plumstead Road (A206) to the south, Arsenal Way to the west and Cornwallis Road to the east. The site is currently a construction compound in association with the Woolwich Crossrail station box. The northern boundary adjoins Gunnery Terrace, a refurbished industrial building which contains a mix of business units.
2. Gunnery Terrace is locally listed as a handsome example of 19C industrial architecture from the Royal Arsenal and benefits from historic association with the neighbouring Grade II listed New Carriage Store. The Grade II listed Royal Arsenal Middle Gate and attached boundary wall lie to the south and east. The site lies within the Royal Arsenal Conservation Area and the defined Woolwich Town Centre.
3. The site forms the eastern part of Site 2 (Crossrail) as identified within the Woolwich Town Centre Masterplan SPD (April 2012). The SPD recognises that land in close proximity to the Crossrail station will become a major focus for redevelopment, including major mixed-use development over the station itself. The site benefits from an extant planning permission (reference 13/3307/F) for a mixed use redevelopment including 394 dwellings.
4. The site has excellent public transport accessibility with a PTAL rating of 6b. It is located within an Air Quality Management Area and Flood Zone 1.

Proposal:

5. Request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (EIA) Regulations 2017 (as amended) for the redevelopment of the site comprising:
 - Up to approximately 515 dwellings
 - Up to approximately 1000sqm non-residential floor space (Use Classes A1-A4, B1, D1 and D2)
 - A series of buildings of varying height (maximum height of 26 storeys)
 - Central landscaped podium with vents and shafts related to the railway below
 - 20 blue badge spaces and two standard car park spaces

Relevant Planning History:

6. 13/3307/F: Planning permission granted 01/04/2015 for Construction of 394 residential units and 734m² of non-residential floor space (Use Classes A1, A2, A3, A4, B1, D1 and D2) within five buildings surrounding a central landscaped podium and the east ventilation shaft and service buildings at Woolwich Crossrail Station. All with associated car parking access, servicing and landscaping.
7. 12/2818/EIA: Scoping Opinion issued 20/12/2012 in accordance with Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 for the redevelopment of the site to provide

400 dwellings, 800m² of commercial floor space, parking and communal garden podium.

Consultation:

8. The following parties were notified on the application as summarised below. Full copies of these comments are available upon request.

- Conservation Officer - No comments received.
- Planning Policy - No comments received.
- Urban Design - No comments received.
- Transport - No comments received.
- Regeneration - No comments received.
- Sustainability - No comments received.
- Waste Services – Note waste and recycling storage and collection has not been considered as part of EIA but that a Waste Management Strategy Report will be submitted with any application.
- Pollution - No comments received.
- Parks and Open Spaces - No comments received.
- Community Safety - No comments received.
- Housing Strategy – note terms set out in scoping report acceptable to address requirements for delivery of affordable housing.
- Public Health – welcome submission of Health Impact Assessment. Recommend liaison with CCG to understand implications the development may have on the local population with respect to access to health care.
- Education – note the scale and location of the proposed development is likely to impact on the demand for school places in the north of the borough, where pressure on school places is expected in the medium to long term. Relevant to consideration of CIL/S106 payments.
- Greenwich Early Years - No comments received.
- Flood Risk - No comments received.
- Crime Prevention Officer – comments relating to design and layout, including lighting, surveillance, access and access control, signage and anti-social behaviour received.
- SGN – refer to website for location of gas pipes and utilities.
- EDF - No comments received.
- Thames Water - No comments received.
- Network Rail – Note development is within close proximity to Network Rail's infrastructure, we therefore seek railway trip generation information for any increase/decrease in rail trips made at Woolwich Arsenal as a result of the proposal (specifically how many people from the development are expected to use the railway, particularly at peak travel times) either within the EIA or Transport Assessment to understand how the proposed development will interact with Network Rail.
- TfL – comment as below:
 - A full Healthy Streets Transport Assessment (TA) is required in support of the submission of this application. Guidance on how to prepare the TA can be found on the following website:
<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-as>

[essment-guide/transport-assessments](#). As part of the Healthy Streets TA, TfL expects to see an Active Travel Zone (ATZ) assessment to be undertaken.

- A robust trip generation assessment for all land uses should be included within the TA. For public transport modes, trips should be split by mode, line and direction.
 - The new London Plan has gone through the examination in public (EiP) process, with the Mayor publishing an intend to publish version of the plan in December 2019. This Plan now has significant weight in planning terms. There is a possibility that the new London Plan will be adopted prior to the submission of a full planning application for this site. The applicant should therefore ensure that their scheme is fully compliant with policies contained within the latest version of this Plan.
 - The document references the provision a Car Parking Management Plan as part of the proposed submission. This reference should be amended to read 'Parking Design and Management Plan'.
 - The Site constitutes OSD and is situated above the Woolwich Crossrail Station. As identified in Policy D13 of the intend to publish London Plan, the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses is placed on new developments. The applicant will therefore need to consider its proximity to the existing railway station as part of this assessment and identify any necessary.
 - It is understood that the proposed development will include 20 disabled persons parking spaces. This level of provision complies with intend to publish London Plan policy T6.1 for the proposed quantum of residential dwellings. Two standard spaces will also be provided and will be allocated for the Crossrail station maintenance team. In line with intend to publish London Plan policy, sufficient justification should be provided for operational parking.
- London City Airport - No comments received.
 - Greater London Authority - No comments received.
 - Environment Agency - The scope of the proposed EIA is acceptable in principle in that it outlines key issues of concern, water quality, drainage and land contamination with respect to the underlying geology and site setting. Request that the interconnection between drainage design, building foundations and potential water quality impacts are fully outlined and scoped into the assessment to ensure overlapping issues are properly understood in design, and constraints for the development and topics are not addressed in isolation.

- Natural England – note proposal does not appear to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.
- PLA – Consider the use of the River Thames through the supply chain must form a consideration of the Construction Logistics Plan (CLP) and the Construction Environmental Management Plan (CEMP) to be submitted with any future application.
- Sport England – no comment. Note impact of development on sports facilities or activities would not normally fall within the scope of an Environmental Statement.
- Historic England - No comments received.
- GLAAS - conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and recommend scoping out archaeology.
- NHS England - No comments received.
- London Borough Newham - No comments received.

Legislative Framework:

9. The process of Environmental Impact Assessment (EIA) is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The 2017 Regulations came into force on 16 May 2017.
10. The aim of EIA is to protect the environment by ensuring that a local planning authority, when deciding whether to grant planning permission for a project, takes into account the significant effects on the environment in the decision-making process. The Regulations set out a procedure for identifying those projects which should be subject to EIA, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects.
11. Regulation 15 (6) of the Regulations states that before adopting a scoping opinion the authority must take into account:
 - any information provided by the applicant about the proposed development;
 - the specific characteristics of the particular development;
 - the specific characteristics of development of the type concerned; and
 - the environmental features likely to be significantly affected by the development.

Considerations:

12. The submitted EIA Scoping Report (by WSP) sets out the proposed scope and methodologies of the technical assessments of the EIA has been independently reviewed by a specialist external consultant (Land Use Consultants). This review concludes that the scoping report provides the

minimum statutory information to enable the Council to determine the scoping opinion. The consultant broadly agrees with the proposed scope of the ES in terms of which disciplines have been scoped in or out however the scope of some individual assessments requires further clarification which will need to be addressed as part of the Environmental Statement.

13. The detailed findings of the consultant's review of the scoping report under each chapter heading are summarised below (with relevant chapter numbers noted), however full reference should be made to the report as attached as **appendix 1**.

Topics to be scoped in:

14. Air quality

- The scope of the air quality assessment is generally considered acceptable and appropriate. This is further detailed through section 3.1-3.11 of the Review of the EIA Scoping Report (Prepared by LUC). However, the review makes a number of recommendations in respect of making reference to appropriate guidance, baseline monitoring locations, cumulative assessment of combined emissions and impact of emissions from Crossrail Station plant and tunnel ventilation equipment.

15. Ground conditions

- This is further detailed through section 3.12-3.19 of the Review of the EIA Scoping Report (Prepared by LUC). Further information and justification is required to discount the effects during the operational phase of the development. Further information is required on the site history. Whilst the proposed assessment methodology appears robust, the proposed sensitivity criteria of construction workers should be increased to high. In addition to impacts arising from soil contamination, other impacts including arising from UXO and asbestos should be considered as appropriate. An assessment of cumulative effects is required.

16. Noise and vibration

- This is further detailed through section 3.20-3.27 of the Review of the EIA Scoping Report (Prepared by LUC). In summary the proposed scope and baseline noise survey is considered acceptable. A description of mitigation measures required to mitigate significant effects in relation to noise and vibration is required. The assessment should also include a methodology for assessing the cumulative effects from nearby committed developments.

17. Water resources and flood risk

- This is further detailed through section 3.28-3.45 of the Review of the EIA Scoping Report (Prepared by LUC). It is agreed that the site is at low risk of fluvial flooding and not at risk from flooding from artificial sources. Groundwater flooding risk is also considered to be low. It is recommended

that the ES should include the incoming water usage and outgoing wastewater volumes in consultation with Thames Water. The study area for the assessment of cumulative effects needs to be defined in chapter 8 of the Scoping Report. The Environment Agency request that the interconnection between drainage design, building foundations and potential water quality impacts are fully outlined and scoped into the assessment to ensure overlapping issues are properly understood in design, and constraints for the development and topics are not addressed in isolation.

18. Socio-economics

- This is further detailed through section 3.46-3.60 of the Review of the EIA Scoping Report (Prepared by LUC). The topics and social infrastructure study areas are considered appropriate and acceptable in accordance with best practice guidelines. Further details are required to demonstrate how the proposed development will maximise beneficial effects on the local community and environment.

19. Telecommunications

- This is further detailed through section 3.61-3.64 of the Review of the EIA Scoping Report (Prepared by LUC). The scope of this chapter including assessment methodology and potential mitigation measures is considered appropriate.

20. Daylight, sunlight and overshadowing

- This is further detailed through section 3.65-3.74 of the Review of the EIA Scoping Report (Prepared by LUC). It is recommended that the scope for daylight, sunlight, overshadowing and solar glare be extended to include the existing residential units in Royal Carriage Mews (Blocks A and B). The proposed methodology is considered appropriate. Depending on the overshadowing assessment, the children's play area and garden of Foundry House should be assessed. A number of recommendations are made with regards to the categorisation of impacts and format of the daylight/sunlight report. In relation to cumulative effects it is recommended that the assessment should include effects on dwellings within Building 10, Royal Carriage Mews.

21. Environmental wind

- This is further detailed through section 3.75-3.88 of the Review of the EIA Scoping Report (Prepared by LUC). The scope, assessment methodology and consideration of cumulative effects s considered acceptable.

22. Townscape and visual impact assessment

- This is further detailed through section 3.89-3.108 of the Review of the EIA Scoping Report (Prepared by LUC). The appropriate guidance is referred to.

The Zone of Theoretical Visibility used to inform the study area should be included in the ES. A number of recommendations are made in relation to identifying relevant townscape character areas following best practice guidance. The definition of visual receptors needs to be further refined. 17 representative viewpoints have been agreed with RBG. Their locations need to be presented visually. Recommendations are also made in relation to the proposed assessment methodology (including the requirement to consider reversibility) and the requirement for a reasoned narrative to be provided for all identified effects.

23. Built heritage

- This is further detailed through section 3.109-3.132 of the Review of the EIA Scoping Report (Prepared by LUC). The separation of built heritage from townscape is welcomed to allow for a more thorough understanding of heritage significance. We query the justification for the selection area and advise further work is required in relation to identification of sensitive receptors, particularly in the absence of a zone of theoretical visibility from the built heritage methodology. The geographic location of assets needs to be referenced throughout the chapter. It is noted that the Greater London Historic Environment Record has not been consulted in relation to identification of non-designated assets and the Historic England Good Practice Advice Note 2 in relation to assessing impact. The approach to grouping of sensitive receptors is to be reconsidered. The criteria for asset value should be amended to ensure all statutorily listed assets are assessed as of high value in the first instance.

24. In relation to the assessment of significant effects, the ES is required to contain a clearly reasoned rationale for determining different levels of effect and care needs to be taken in relation to terminology. Further details of proposed mitigation are required and we recommend the required cumulative assessment details how the presence of the cumulative schemes would affect the significance of relevant heritage assets.

25. Transport and access

- This is further detailed through section 3.133-3.150 of the Review of the EIA Scoping Report (Prepared by LUC). The scoping in of transport and access is supported. The study areas, survey locations and scope of the baseline are considered appropriate. There are a number of recommendations in terms of the undertaking of traffic surveys. Network Rail and TfL also make recommendations relating to the content of the Transport Assessment to be submitted with any application. The PLA consider the use of the River Thames through the supply chain must form a consideration of the Construction Logistics Plan (CLP) and the Construction Environmental Management Plan (CEMP) to be submitted with any future application.

26. Reference to the Crossrail ES is acceptable however given the passage of time (2005) the applicant is encouraged to ensure it remains relevant and

robust, including for example in terms of identifying sensitive receptors. All committed and cumulative developments are to be agreed with RBG.

27. Climate change

- This is further detailed through section 3.151-3.161 of the Review of the EIA Scoping Report (Prepared by LUC). Scoping in of Greenhouse Gas emissions is agreed.

28. Cumulative effects

- The proposed assessment is considered acceptable. Cumulative effects will need to be referenced in the Non-technical summary.

Topics to be scoped out:

29. Artificial lighting: the Scoping Report demonstrates that the effect of the proposed development on light spill and glare from construction and operation will not materially alter the existing lighting levels identified as a E3 (Medium District Brightness – Suburban) and E4 (High District Brightness – Urban).
30. Archaeology: based on the recent Crossrail related construction works at the site the scoping out of this topic is considered acceptable and in accordance with the recommendations of Historic England.
31. Aviation: the proposed development would be below the height limits imposed by London City Airport and the scoping out of aviation is therefore acceptable.
32. Ecology: the Scoping Report confirms the site is of negligible ecological value. Enhancements can be secured through planning conditions. Scoping out of this topic would be consistent with Natural England's response to the consultation.
33. Health and wellbeing: construction and operation of the development is unlikely to cause any change to accessibility or provision of health services. Planning conditions can be imposed to mitigate health impacts during construction. Health impacts can also be considered within relevant chapters being scoped in.
34. Major accidents and hazards: the qualitative appraisal in the Scoping Report concluded that MA&D events are unlikely to give rise to significant effects and can be scoped out of the ES.
35. Services and utilities: we agree that no significant effects are expected. Nonetheless any application will be supported by a Utilities Statement.
36. Sustainability and energy statements: this topic will be used to inform other technical chapters including air quality; however can be scoped out as a

separate topic.

Recommendation:

37. That the Scoping Report for the proposed development meets the statutory requirements for scoping set out in the EIA Regulations and adequately describes the relevant topics to be included in the Environmental Statement in support of the proposed planning application, subject to a number of recommendations in relation to guidance, methodology and content of the ES, as set out in Appendix 1.