

<b>Planning Board</b>	<b>Agenda Item: 4</b>
<b>10 December 2024</b>	<b>Reference No: 24/0848/R</b>
	<b>Document Link: 24/0848/R</b>

**Applicant: Berkeley Homes (East Thames) Ltd**  
**Agent: Stantec UK Limited**

<b>Site Address:</b> The Ropeyard, Royal Arsenal Riverside, Plots D & K, Land between Duke of Wellington Avenue and Beresford Street, London SE18 6NP	<b>Ward:</b> Woolwich Arsenal  <b>Application Type:</b> Reserved Matters
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I. Recommendation

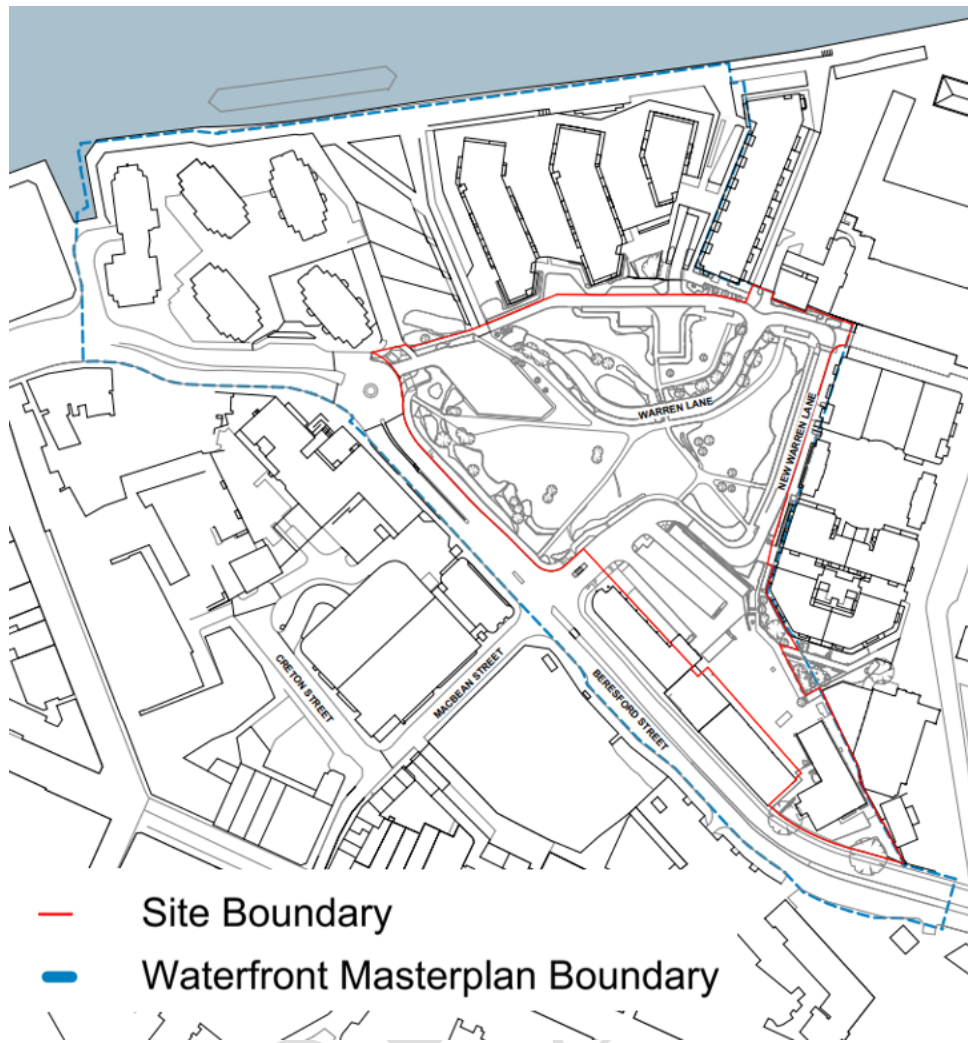
- I.1 That reserved matters approval be GRANTED for Submission of Reserved Matters (Appearance, Landscaping, Layout and Design) pursuant to Condition 2 of planning permission reference 16/3025/MA, dated 17.03.2017, for residential units and non-residential floorspace within Plots D and K3, K4, K5, along with public / private landscaping details, car / cycle parking, refuse / recycling facilities and play provision.
- I.2 Subject to:
- ii. The satisfactory completion of a deed of variation to the Section I06 (S106) Legal Agreement (obligations set out in Section 28); and
  - iii. Conditions set out in Appendix 2 and any addendums.
- I.3 To authorise the Assistant Director (Planning & Building Control) to:
- (i) Make any minor changes to the detailed wording of the recommended conditions as set out in the report (Appendix 2), its addendums and the minutes of this Planning Board meeting, where the Assistant Director (Planning & Building Control) considers it appropriate, before issuing the final decision notice.
  - (ii) Finalise the detailed terms of the deed of variation to the section I06 agreement (including appended documents) and form of the planning obligations as set out in this report (Section 28), its addendums and the minutes of this Planning Board meeting.
  - (iii) Consider, in the event that the deed of variation to the Section I06 Agreement is not completed within three (3) months of the date of this Planning Board resolution, whether consent should be refused on the grounds that the agreement has not been completed within the appropriate timescale, and that the proposals are unacceptable in the

absence of the recommended planning obligations; and if the Assistant Director (Planning & Building Control) considers it appropriate, to determine the application with reasons for refusal which will include the following:

- In the absence of a deed of variation to the existing s106 legal agreement to secure the necessary obligations regarding affordable housing, transport and highway works, public realm environment, and sustainability the development would fail to demonstrate compliance with affordable housing requirements and mitigate its impact on local highways and provide for the safety of road users and pedestrian, cycle infrastructure, and environmental sustainability contrary to Policy D8, Policy H4, Policy H5, Policy H6, Policy H7, Policy SI 1, Policy SI 2, Policy SI 3, Policy T2, Policy T3, Policy T4, Policy T5, Policy T6, Policy T6.1, and Policy T9 of the London Plan (2021) and Policy H3, Policy H5, Policy EI, Policy IM(a), and Policy IM(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014), and the Planning Obligations (s106) Guidance SPD (July 2015).

## **2. Executive Summary**

- 2.1 The application site falls within the Waterfront Master Plan which was granted outline planning permission (OPP) under planning reference 13/0117/0 on 19/06/2013, and subsequently amended by planning reference 16/3025/MA approved on 17/03/2017. The wider Waterfront Master Plan site area and the site area for the current application are shown below in figure 1. The site area for the current application relates only to Plots D and K3, K4, K5 along with public / private landscaping area referred to as the Maribor Park Land. In regard to the Maribor Park Land, officers note that the current layout of the park was granted temporary approval only under ref 14/1223/F and the design for the permanent park was granted reserved matters approval under 15/0596/R. The application redline for Ref: 24/0848/R falls partially over the redline for of the submission approved under ref 15/0596/R. Where this overlap occurs, the proposals for ref: 24/0848/R would supersede ref 15/0596/R. The areas of ref 15/0596/R outside of the current application boundary would retain reserved matters approval.



**Figure 1 Site area for 24/0848/R (Plan ref: Z429-PRP01-STW-ZZ-DR-A-880-000 - showing Plots D and K3, K4, K5 along the Maribor Park Land)**

2.2 The proposal is in relation to the following proposed development: Submission of Reserved Matters (Appearance, Landscaping, Layout and Design) pursuant to Condition 2 of planning permission reference 16/3025/MA, dated 17.03.2017, for residential units and non-residential floorspace within Plots D and K3, K4, K5, along with public / private landscaping details, car / cycle parking, refuse / recycling facilities, and play provision, and the addition of condition of consent to support the provision of:

- 663 homes (Use Class C3) within Plots D and K3, K4, K5;
- 71 wheelchair adaptable/accessible homes;
- 959.1sqm non-residential floorspace located in Buildings D3, D5, K3 K4 and K5;
- 127 car parking spaces and 15 on-street accessible parking bays; and
- 1,262 long stay residential cycle spaces and 22 short stay visitor spaces, and 34 non-residential cycle spaces (12 long stay visitor cycle spaces and 22 short stay visitor cycle spaces).

- 2.3 The principle of redevelopment and general parameters for the proposed buildings were established by the OPP. As a result of changes to the legislation controlling development, additional fire safety requirements apply to buildings over 18m including the provision of additional stair cases and lifts, and these requirements were not in place when the OPP was approved. These change to the relevant legislation have constrained the floor spaces which can be provided as housing within the seven proposed buildings (D1, D2, D3, D4, D5 and K3 K4 and K5) which are all above 18m in height and therefore are currently required to provide two staircases and three elevator lift shafts per building. To accommodate the changes required under the wider development legislation while continuing to deliver housing numbers in line with the OPP, the applicant has submitted an application for non-material amendments to accommodate height increases to the parameter plans approved under the OPP. The proposed non-material amendments are being considered concurrently under planning reference 24/0887/NM which proposes to establish updated parameter plans within increased heights. The principle of updated parameter plans is considered within the officer's report for 24/0887/NM, and this reserved matters application relies on the revised parameter plans within the relevant sections below.
- 2.4 The Highways Officer has raised concern as the southern most balconies in Block K oversail the adopted public highway and the corner of the building at New Warren Lane partially sits on and over existing adopted highway, due to the arrangement of the chamfered lower ground floor. Generally, the Highways Officer advised that the Highway Authority do not support balconies oversailing the public highway in order that users of a public highway are not endangered as a result of a building oversailing the public footway. If the Planning Board approves the application, the developer will after the grant of the reserved matters approval need to obtain a highways oversailing licence from the Council's highway authority under the Highways Act 1980. The developer will also have to apply for and obtained a stopping up order to be able construct Block K in respect of the corner of the building at New Warren Lane partially sits on existing adopted highway. The usual process for applying for this type of stopping up order is under S247 of the Town and Country Planning Act 1990. The licence and stopping up order will need to be obtained before the relevant parts of the development are carried out. However, the Council's Planning Board has to consider the highways and other implications and impacts of these aspects of the proposal in considering this application.

- 2.5 Planning Officers note that, notwithstanding the associated s96A amendment, the southern and western boundaries of Blocks K4-3 with Beresford Street and New Warren Lane remains consistent with the approved outline parameter plans and accordingly this arrangement is understood to already benefit from planning permission. While this does not resolve the comments of the Highways Officer, Planning Officers consider this is a material consideration of determining this reserved matters application, alongside the concerns of the Council's highways department, which the Planning Board should consider. Accordingly, in light of the principle of this arrangement being approved under the OPP and revised OPP and whilst noting the concerns of the Council's highway officer, Planning Officers do not object to layout of Blocks K3-4 in relation to the public highway.
- 2.6 The application has been subject to consultation with statutory consultees, local residents and interested groups. A total of 112 consultation responses (comprising 110 objections, two comments of support, and one comment of partial support) have been received and these are detailed in Section 7 of this report along with the responses from internal and external consultees.
- 2.7 Officers have considered the circumstances of this application against the relevant development plan policies in the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and the London Plan (2021) as well as the National Planning Policy Framework and National Planning Practice Guidance and have concluded that the principle of redevelopment and general parameters for the proposed were established by the OPP. These are discussed further within the relevant sections below.
- 2.8 The application is consistent with the OPP subject to the aspects which are proposed to be amended via a non-material amendment (ref. 24/0887/NM). These proposed changes are considered to be non-material however noting the link to this reserved matters application these are reported to planning board for consideration accordingly.

### 3. **Summary**

- 3.1 Detailed below is a summary of the application:

<b>The Site -</b>	
Site Area (m <sup>2</sup> )	2.3 Hectare (23,000m <sup>2</sup> )
Local Plan Allocation	Warren / Royal Arsenal Masterplan Area Strategic Development Location and Woolwich Town Centre overlay within the Royal

	<p>Borough of Greenwich Local Development Framework (2014).</p> <p>The northern extent of the site falls within the Thames Policy Area.</p>
Heritage Assets	<p>The northeastern extent of the site falls within the Royal Arsenal Conservation Area and is located to the north of Woolwich Conservation Area.</p> <p>There are no heritage assets within the application site.</p> <p>Further, the site falls within the Areas of High Archaeological Potential designated within the Local Development Framework (2014).</p>
Tree Preservation Order	Not applicable
Flood Risk Zone	Flood zone 1 (flood-map-for-planning.service.gov.uk)

Proposed Building	
<b>D1</b>	
Building height (metres)	30.6
No. of storeys	9
Floor area (m <sup>2</sup> )	4920.3m <sup>2</sup>
<b>D2</b>	
Building height (metres)	31.2
No. of storeys	9
Floor area (m <sup>2</sup> )	3124.9m <sup>2</sup>
<b>D3</b>	
Building height (metres)	58
No. of storeys	18
Floor area (m <sup>2</sup> )	9409.6m <sup>2</sup>
<b>D4</b>	
Building height (metres)	50.2
No. of storeys	16
Floor area (m <sup>2</sup> )	7245.3m <sup>2</sup>
<b>D5</b>	
Building height (metres)	45
No. of storeys	14
Floor area (m <sup>2</sup> )	30789.2m <sup>2</sup>

<b>K3/K4</b>	
Building height (metres)	32.7
No. of storeys	10
Floor area (m <sup>2</sup> )	6813.7m <sup>2</sup>
<b>K5</b>	
Building height (metres)	57.3
No. of storeys	18
Floor area (m <sup>2</sup> )	12094.4m <sup>2</sup>

<b>Housing</b>		
Density	Habitable Rooms per Hectare (HRH)	781.3HRH
Dwelling Mix	1B1P	36 (5.43%)
	1B2P	250 (37.71%)
	1B2PW	2 (0.3%)
	2B3P	57 (8.6%)
	2B3PW	68 (10.26%)
	2B4P	179 (27%)
	2B4PW	1 (0.15%)
	3B5P	70 (10.56%)
Affordable Housing / Tenure Split	Overall Affordable Housing (no. / %)	306 (46.15%) with 306 secured by the S106 Agreement, but the intention for 25 off-site provision)
	Social Rent (no. / %)	With 115 secured by the S106 Agreement (90 on-site Affordable Rent (13.57%), but the intention for 25 off-site Affordable Rent at Kidbrooke Village (3.77%))
	Intermediate / Shared Ownership (no. / %)	101 on-site Shared Ownership (15.23%)  90 on-site Discount Market Sale (13.57%)
	Private (no. / %)	382 (55.5%)
	Commuted Sum	-

Adapted and Accessible Homes	71 Adapted and Accessible homes (10%) are proposed, within Buildings D1, D2, D3, D4, D5 and K5.	
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes

Non-Residential Uses		
Existing Use(s)	Existing use (Classes) / Operator	N/A
	m <sup>2</sup>	
Proposed Use(s)	Proposed use(s) (Classes) / Operator	C3 – Dwellinghouses and Use Class E, F.1, F.2 and Sui Generis
	m <sup>2</sup>	C3 – 42843.9m <sup>2</sup> and Use Class E, F.1, F.2 and Sui Generis – 959.1m <sup>2</sup>
Employment	Existing Number of Jobs	N/A
	Proposed number of jobs	Operators TBC

Transportation		
Car Parking	No. existing car parking spaces	N/A
	No. Proposed Car Parking Spaces	<ul style="list-style-type: none"> <li>• 124no. car parking spaces in basement.</li> <li>• 15no. on-street accessible bays.</li> <li>• 4no. loading bays within the public realm.</li> </ul>
	Proposed Parking Ratio	0.19:1 (basement spaces)



Cycle Parking	No. Proposed Cycle Parking	1318 comprising: • Residential: 1,262 long stay spaces and 22 short stay spaces.  • Non-residential: 12 long stay spaces and 22 short stay spaces
	Complies with policy	Yes
Public Transport	PTAL Rating	6a

Play Space Provision	
Provision by age	<ul style="list-style-type: none"> <li>• 0-4yrs old: 853m<sup>2</sup></li> <li>• 5-11yrs old: 633m<sup>2</sup></li> <li>• 12-15yrs old: 261m<sup>2</sup></li> <li>• 16-17yrs old: 138m<sup>2</sup></li> <li>• Total: 2,059m<sup>2</sup> (Plots D &amp; K 1,884m<sup>2</sup> + Plots A &amp; B 175m<sup>2</sup>)</li> </ul>

Sustainability / Energy	
BREEAM Rating	Excellent rating under the New Construction 2018 scheme with a predicted score of at least 71.55%.
Renewable Energy Source (%)	76.46% against BR Part L 2021 (using SAP10.2 emission factors). <ul style="list-style-type: none"> <li>• Connection to Royal Arsenal Riverside heat network</li> <li>• Carbon off-setting contribution of £989,000</li> </ul>
Biodiversity Net Gain	<ul style="list-style-type: none"> <li>• Combined net gain in habitat units of 62.06% (2.23 units).</li> <li>• Hedgerow units net gain of 1897.55% (0.19 units).</li> </ul>
Urban Greening Factor	0.4

Public Consultation	
Number in Support	3
Number of objections	110

3.2 The report details all relevant national, regional and local policy implications of the scheme, including supplementary planning guidance.

- 3.3 The application is considered acceptable and is recommended for approval, subject to satisfactory completion of the conditions set out in the report.

## Site Plan

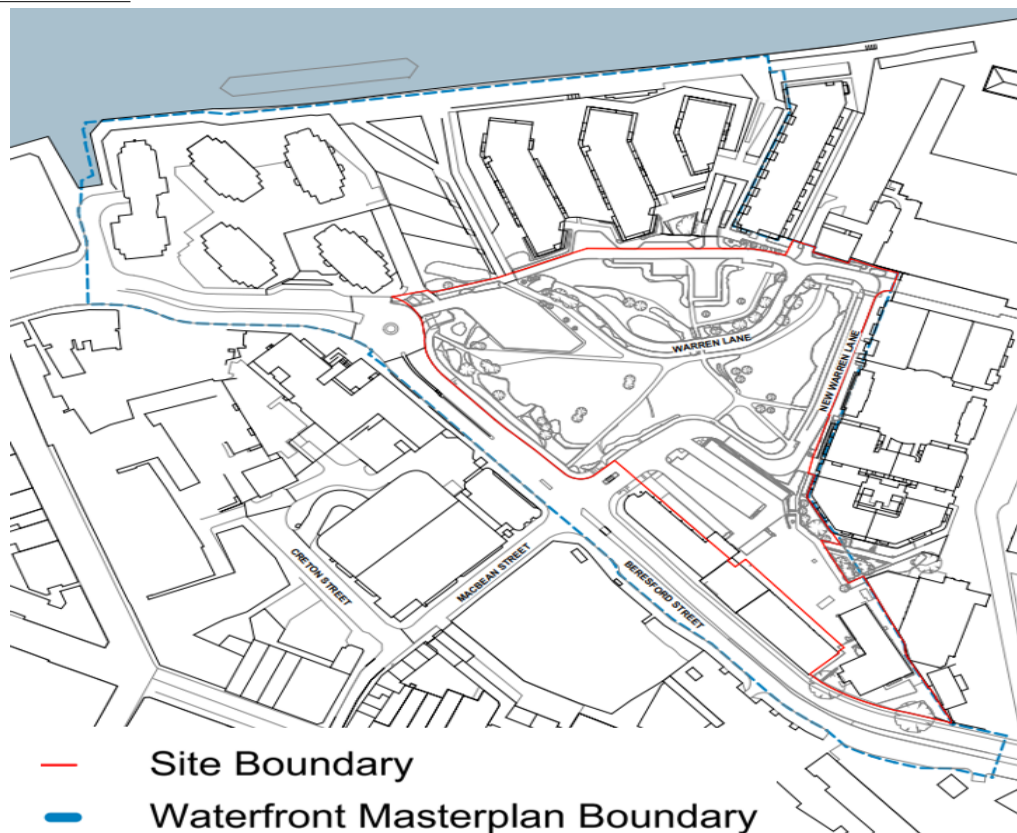


Figure 2 Site area for 24/0848/R (Plan ref: Z429-PRP01-STW-ZZ-DR-A-880-000 - showing Plots D and K3, K4, K5 along the Maribor Park Land)

## 4. Site and Surroundings

- 4.1 The application site and surroundings are described in full in section 5 of the submitted Planning Statement. A summary of this description is included here.
- 4.2 The application site falls within the Waterfront Master Plan which was granted outline planning permission (OPP) under planning reference 13/0117/0 on 19/06/2013, and subsequently amended by planning reference 16/3025/MA approved on 17/03/2017. The wider Waterfront Master Plan site area and the site area for current application are shown above in figure 2. The application site is 2.3ha and currently features a temporary structure associated with the delivery of the development, car parking with temporary planning approval, and public realm landscaping with temporary planning approval. The site is bound to the west and south by the A206, the Waterfront Masterplan Plots A and B and Royal Arsenal Board Room (The Academy) are located to the north (and north east) and Royal Arsenal Riverside Phase 3, including the Laboratory Buildings, the Brass Foundry and The Guard House to the east.

- 4.3 The site area for the current application relates only to Plots D and K3, K4, K5 along with public / private landscaping area referred to as the Maribor Park Land. In regard to the Maribor Park Land, officers note that the current layout of the park was granted temporary approval only under ref 14/1223/F and the design for the permanent park was granted reserved matters approval under 15/0596/R. The current plans for the permanent park will partially supersede the plans previously approved under submission 15/0596/R.
- 4.3 The site falls within the Warren / Royal Arsenal Masterplan Area Strategic Development Location and within the Woolwich Town Centre overlay within the Royal Borough of Greenwich Local Development Framework (2014). The nearest watercourse to the Site is the Thames River which is designated as a Site of Nature Conservation (SINC) and is located c95m to the north of the application site. The northern extent of the site falls within the Thames Policy Area.
- 4.4 The northeastern extent of the site falls within the Royal Arsenal Conservation Area and is located to the north of Woolwich Conservation Area, as shown in figure 2 of the submitted Heritage Impact Assessment prepared by Orion and dated March 2024. However, there are no listed buildings or heritage assets within the application site. The Site is in near proximity of heritage assets including the Grade II. Listed Laboratory Pavilions (West and East) which are located to the north-east of the application site across New Warren Lane, the Grade I. Listed Brass Foundry & Royal Foundry which is located to the northeast of the site, and there are other listed buildings within the masterplan area, including the Royal Military Academy which is located to the north of the application site. The Planning Statement includes the below list of historically significant buildings located within the local area:

Listed Buildings (not exhaustive list)

- Royal Arsenal Royal Brass Foundry, Listed Grade I
- Royal Arsenal Main Guardroom, Listed Grade II
- Royal Arsenal Verbruggens House, Listed Grade II
- Royal Arsenal, Royal Laboratory West Pavilion, Listed Grade II
- Royal Arsenal Royal Laboratory East Pavilion, Listed Grade II
- Royal Arsenal Dial Square Entrance Range, Listed Grade II\*
- Royal Arsenal The Board Room (The Academy), Listed Grade II\*

Locally Listed Buildings

- the Former Royal Dockyard Apprentice School,
- the Royal Dockyard Gates and Wall,
- the Royal Dockyard River Wall including Trinity Stairs,

- the Royal Dockyard Shipbuilding Slips No. 5 and 6, Mast Quay
- the Royal Dockyard Railway Tunnel under Woolwich Church Street
- Block I, the Royal Dockyard Woolwich Store Warehouse

4.5 Further, the site falls within the Areas of High Archaeological Potential designated within the Local Development Framework (2014). Beresford Street (A206) lies to the south of the site and is a London Distributor Road. The site is highly accessible, with a Public Transport Access Level (PTAL) of 6a. Crossrail Tunnels for the Elizabeth Line lay from south-east to north-west underneath the site.

4.6 Beyond the immediate site boundaries, to the north of is the River Thames and to the south and south east is Woolwich Town Centre including the main shopping area along Powis Street, General Gordon Square, the Woolwich Arsenal Overground Train Station and the Woolwich DLR Station.

## 5. Relevant Planning History

### Original Permission:

<b>App Number:</b>	<b>13/0117/0</b>	<b>Status:</b>	Approved 19/06/2013
<b>Address</b>	The Warren Masterplan, Land adjacent to Beresford Street/Woolwich High Street, Woolwich, SE18		
<b>Description:</b>	<b>Description:</b> Outline planning permission for a mixed-use development comprising 2,032 residential units and 2,442 (GEA) sqm of non-residential floor space (A1 / A2 / A3 / A4 / B1 / D1 uses), access, landscaping, publicly accessible open space, car and cycle parking provision and refuse and recycling storage areas.		

### As amended by:

<b>App Number:</b>	<b>16/3025/MA</b>	<b>Status:</b>	Approved 17/03/2017
<b>Address</b>	The Waterfront Masterplan, Land Off Beresford Street, Woolwich High Street, Woolwich, SE18		
<b>Description:</b>	S73 Variation application in respect of planning permission reference 13/0117/O being an Outline Planning Permission for mixed use development comprising 2,032 units and 2,442 (GEA) sqm of non-residential floor space (A1/A2/A3/A4/B1/D1 Use), access, landscaping, public accessible open space, car and cycle parking provision and refuse and recycling storage areas.		

**Any other associated planning history:**

<b>App Number:</b>	<b>I4/0604/R</b>	<b>Status:</b>	Approved 3/07/2014
<b>Address</b>	Phase 6, 7, and 8 (Blocks B), The Warren/Royal Arsenal, Plumstead Road, Woolwich, SE18		
<b>Description:</b>	<b>Description:</b> Submission of Reserved Matters (Appearance, Landscaping, Layout and Scale) pursuant to Condition 2 of Outline Planning Permission, dated 19.6.2013 (Ref: I3/01 I7/O) for 562 residential units and 127m <sup>2</sup> (GEA) of non-residential floor space within Blocks B1, B2 & B3.		

<b>App Number:</b>	<b>I4/I223/F</b>	<b>Status:</b>	Approved 31/07/2014
<b>Address</b>	Land Off Warrant Lane, The Warren Royal Arsenal, Warren Lane, Woolwich, SE18		
<b>Description:</b>	<b>Description:</b> Change of use of existing car park and site compound to landscaped open space, including the provision of 10 car parking spaces and amended pedestrian and vehicle access, for a temporary period of five (5) years.		

<b>App Number:</b>	<b>I5/0596/R</b>	<b>Status:</b>	Approved 30/04/2015
<b>Address</b>	Waterfront Park, The Warren/Royal Arsenal, Woolwich SE18		
<b>Description:</b>	Submission of Reserved Matters (Appearance, Landscaping, Layout and Scale) pursuant to Condition 2 of Outline Planning Permission, dated 19.6.2013 (Ref: I3/01 I7/O) for a new Waterfront Park.		

<b>App Number:</b>	<b>I5/I036/NM</b>	<b>Status:</b>	Approved 11/05/2015
<b>Address</b>	Phase 6, 7, and 8 (Blocks B), The Warren/Royal Arsenal, Plumstead Road, Woolwich, SE18		
<b>Description:</b>	<b>Description:</b> Non-material amendment is sought to reserved matters dated 3rd July 2014 (Ref: I4/0604/R) for alterations to the approved basement, access ramp and landscaping.		

<b>App Number:</b>	<b><u>16/3024/R</u></b>	<b>Status:</b>	Approved 20/03/2017
<b>Address</b>	Plot A, Royal Arsenal Riverside, Plumstead Road, Woolwich, SE18		
<b>Description:</b>	<b>Description:</b> Submission of Reserved Matters (Appearance, Landscaping, Layout and Scale), pursuant to condition 2 of Outline Planning Permission (Ref: 13/0117/O dated 19.06.13 for 764 residential units and 602 (GEA) sqm of non-residential floorspace within the A Blocks (Phases 9/10/11/12/13/14) and revised landscaping details for the northern part of the Waterfront Park.		

<b>App Number:</b>	<b><u>18/0342/NM</u></b>	<b>Status:</b>	Refused 23/02/2018
<b>Address</b>	Plot A, Royal Arsenal Riverside, Plumstead Road, Woolwich, SE18		
<b>Description:</b>	<b>Description:</b> An application submitted under Section 96a of the Town & Country Planning Act 1990 for a non material amendment in connection with the planning permission 20/03/2017 (Reference: 16/3024/R) for the submission of Reserved Matters (Appearance, Landscaping, Layout and Scale), pursuant to condition 2 of Outline Planning Permission (Ref: 13/0117/O dated 19.06.13 for 764 residential units and 602 (GEA) sqm of non-residential floorspace within the A Blocks (Phases 9/10/11/12/13/14) and revised landscaping details for the northern part of the Waterfront Park to allow: <ul style="list-style-type: none"> <li>• Removal of approved basement for A blocks.</li> <li>• Relocation of plant rooms and cycle stores.</li> <li>• Partial removal of tunnel abutting B blocks basement.</li> <li>• Reconfiguration of refuse stores, associated waste strategy and basement ramp entrance.</li> </ul>		

<b>App Number:</b>	<b><u>18/0650/NM</u></b>	<b>Status:</b>	Approved 26/04/2018
<b>Address</b>	Plot A, Royal Arsenal Riverside, Plumstead Road, SE18		
<b>Description:</b>	An application submitted under Section 96a of the Town & Country Planning Act 1990 for a non material amendment in connection with the planning permission dated 17/03/2017 (Reference: 16/3025/MA) for the S73		

	<p>Variation application in respect of planning permission reference 13/0117/O being an Outline Planning Permission for mixed use development comprising 2,032 units and 2,442 (GEA) sqm of non-residential floor space (A1/A2/A3/A4/B1/D1 Use), access, landscaping, public accessible open space, car and cycle parking provision and refuse and recycling storage areas to allow:</p> <ul style="list-style-type: none"> <li>- Amendment of condition 58 (Flood Defences) to read <i>"The development of Buildings A1, A2, A3, B1, B2 and B3 shall not commence until a scheme is submitted to and approved in writing by the Local Planning Authority, ensuring that the buildings are located at least 8 metres from the northern river wall and that a 3 metre wide corridor i.e between the new flood defence structure and the buildings, is kept clear of development."</i></li> </ul> <p><i>Phases 6, 7 and 8 of the development shall be carried out in accordance with the details approved by the Local Planning Authority on the 11th June 2015 under planning application reference 14/3794/SD, or as subsequently approved in writing by the Local Planning Authority."</i></p>
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<b>App Number:</b>	<b>18/1202/NM</b>	<b>Status:</b>	Approved 20/06/2018
<b>Address</b>	The Warren Masterplan, Royal Arsenal, Woolwich, SE18		
<b>Description:</b>	<p>An application submitted under Section 96a of the Town &amp; Country Planning Act 1990 for a non material amendment in connection with the planning permission 16/3025/MA, dated 17/03/2017. to allow:</p> <ul style="list-style-type: none"> <li>• Amendment to the wording of condition 18 (Security) to read "The applicant shall obtain 'Secured by Design' Certification for each group of phases (Phases 6-8, Phases 9-14, Phases 15-17, Phases 18-20 and Phase 21) within the development hereby permitted, a copy of which must be submitted to, and approved in writing by, the Local Planning Authority within 3 months of the completion of the final block within the relevant group of phases."</li> </ul>		

<b>App Number:</b>	<b>18/1622/R</b>	<b>Status:</b>	Approved 21/02/2019
<b>Address</b>	The Waterfront Masterplan, Land Off Beresford Street / Woolwich High Street, Woolwich, SE18		
<b>Description:</b>	<b>Description:</b> Submission of Reserved Matters (Appearance, Landscaping, Layout and Scale) pursuant to Condition 2 of Outline Planning Permission dated 17/03/2017 (Ref: 16/3025/MA) for undercroft and ground floor levels within the A Blocks (Phases 9/10/11/12/13/14).		

<b>App Number:</b>	<b>18/4008/NM</b>	<b>Status:</b>	Approved 14/05/2019
<b>Address</b>	A Blocks, Royal Arsenal Riverside, Plumstead Road, Woolwich, SE18 6ST		
<b>Description:</b>	<p><b>Description:</b> An application submitted under Section 96a of the Town &amp; Country Planning Act 1990 for a non material amendment in connection with the planning permission reference 16/3024/R, dated 20/03/2017, for the submission of Reserved Matters (Appearance, Landscaping, Layout and Scale), pursuant to condition 2 of Outline Planning Permission reference 13/0117/O, dated 19/06/2013, for 764 residential units and 602 (GEA) sqm of non-residential floorspace within the A Blocks (Phases 9/10/11/12/13/14) and revised landscaping details for the northern part of the Waterfront Park to allow:</p> <ul style="list-style-type: none"> <li>• Alterations to the Lantern Windows (Blocks A1 – A4);</li> <li>• Replacement Floorplates to reflect changes to windows and unit mix (Blocks A1 – A4);</li> <li>• Redistribution of Unit Mix across Blocks A1 and A2; and</li> <li>• Amendments to the approved residential entrances (Blocks A1 – A4).</li> </ul>		

<b>App Number:</b>	<b>19/3373/F</b>	<b>Status:</b>	Approved 13/07/2020
<b>Address</b>	Land off Warren Lane, The Warren/Royal Arsenal, Warren Lane, Woolwich, SE18		
<b>Description:</b>	Continued use of landscaped open space, including the provision of 10 car parking spaces and amended		



	pedestrian and vehicle access for a temporary period of five (5) years.
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<b>App Number:</b>	<b>19/4077/R</b>	<b>Status:</b>	Approved 27/05/2020
<b>Address</b>	The Waterfront Masterplan, Land off Beresford Street / Woolwich High Street, Woolwich, SE18		
<b>Description:</b>	Submission of Reserved Matters Application (Appearance, Landscaping, Layout and Scale) pursuant to Condition 2 of Outline Planning Permission dated 17/03/2017 (Ref: 16/3025/MA) the undercroft and ground floor levels within the A Blocks (Phases 9, 10, 11, 12, 13 & 14) to provide additional refuse and cycle parking, revised landscaping and an additional 4 residential units within block A4 ( <b>Reconsultation-amended description</b> )		

<b>App Number:</b>	<b>22/3206/NM</b>	<b>Status:</b>	Approved 15/12/2023
<b>Address</b>	Blocks A5 and A6, Part of the Royal Arsenal Riverside, Beresford Street, Woolwich		
<b>Description:</b>	<p>An application submitted under Section 96a of the Town &amp; Country Planning Act 1990 for a non material amendment in connection with the planning permission reference 16/3024/R, dated 20/03/2017, for the submission of Reserved Matters (Appearance, Landscaping, Layout and Scale), pursuant to condition 2 of Outline Planning Permission reference 13/0117/O, dated 19/06/2013, for 764 residential units and 602 (GEA) sqm of non-residential floorspace within the A Blocks (Phases 9/10/11/12/13/14) and revised landscaping details for the northern part of the Waterfront Park to allow:</p> <ul style="list-style-type: none"> <li>• Alterations to the Lantern Windows (Blocks A5 &amp; A6);</li> <li>• Updated apartment layouts and Amended stair and lift core (Blocks A5 &amp; A6)</li> <li>• Amended Building Perimeter (Blocks A5 &amp; A6);</li> <li>• Redistribution &amp; Relocation of Unit &amp; Dwelling Mix (Blocks A5 &amp; A6);</li> </ul>		

	<ul style="list-style-type: none"> <li>• Reduced ground floor commercial (Block A6 only) and increased Cycle Spaces &amp; Refuse/Recycling (Blocks A5 &amp; A6); and</li> <li>• Removal of the number of units and the amount of non-residential floorspace from the development description and addition of conditions to control the total unit numbers and amount of non-residential floorspace</li> </ul>
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<b>App Number:</b>	<b>23/1610/NM</b>	<b>Status:</b>	Approved 18/07/2024
<b>Address</b>	The Warren Masterplan, Land Adjacent to Beresford Street/Woolwich High Street, London SE18		
<b>Description:</b>	An application submitted under Section 96a of the Town & Country Planning Act 1990 for a non material amendment in connection with the planning permission reference 16/3025/MA and 13/0117/O. The amendment sought is to alter the wording of Condition 77 to replace 'Modelling exercise' with 'Design options'.		

<b>App Number:</b>	<b>23/3844/EIA</b>	<b>Status:</b>	Not required 5/01/2024
<b>Address</b>	Royal Arsenal Riverside – Blocks D & K3, K4, & K5 – The Waterfront Masterplan, Land off Beresford Street/Woolwich High Street, Woolwich, SE18		
<b>Description:</b>	Request for an EIA Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for a proposed reserved matters application for a mixed-use development within Plots D and K3, K4 & K5 with up to 660 residential units, and up to 1,100m2 (GEA) non-residential floorspace and landscaping pursuant to outline planning permission dated 17/03/2017 (Reference: 16/3025/MA). The submission of the reserved matters application will be subject to the submission and approval of an application submitted under Section 96a of the Town & Country Planning Act 1990 for a non-material amendment to the planning permission dated 17/03/2017 (Reference: 16/3025/MA) to allow amendments to the parameter plans including building plots, basement car parking, vehicular access and circulation, maximum and minimum heights.		

<b>App Number:</b>	<b>24/0887/NM</b>	<b>Status:</b>	Undetermined
<b>Address</b>	The Ropeyards, Royal Arsenal Riverside, Plots D & K, Land between Duke of Wellington Avenue and Beresford Street, London, SE18 6NP		
<b>Description:</b>	<p>An application submitted under Section 96a of the Town &amp; Country Planning Act 1990 for a non-material amendment in connection with planning permission reference 16/3025/MA, dated 17.03.2017, to allow changes in relation to Plots D and K for the following:</p> <ul style="list-style-type: none"> <li>• Increase height of the zones that contain Buildings 1, 2, 3 and 4 in Plot D and Buildings 3 and 4 in Plot K by 3m.</li> <li>• Increase height of the zone that contains Building 5 in Plot K by 3.5m.</li> <li>• Increase height of the setback along Duke of Wellington Avenue of the zones that contains Buildings 1 and 2 in Plot D by 3 metres.</li> <li>• Removing the setback along Beresford Street of the zones that contain Buildings 3 and 4 in Plot K.</li> <li>• Removal of the link buildings between Buildings D1-D2 and D4-D5.</li> <li>• Creation of a small separation between Building D1 and D5.</li> <li>• Minor modifications of the footprint of Plots D and K.</li> <li>• Update Use Classes to remove A1/A2/A3/A4/B1/D1 and replace with Use Classes E, F.1 and F.2 and drinking establishment (Sui generis), as per the Use Class Order 2020.</li> <li>• Alterations to the Secondary Road and Service / Maintenance Route.</li> <li>• The vehicular entrance into Plot D moved from the east to the north side.</li> <li>• Changes to the parking area in Plot D.</li> </ul>		

## 6. **Proposals (in detail)**

- 6.1 The current application seeks Reserved Matters Planning Permission for Appearance, Landscaping, Layout and Design pursuant to Condition 2 of planning permission reference 16/3025/MA, dated 17.03.2017, for residential units and non-residential floorspace within Plots D and K3, K4, K5, along with public / private landscaping details, car / cycle parking, refuse / recycling facilities and play provision.

- 6.2 The principle of redeveloping the application site for residential development has been established by the 2013 Outline Planning Permission (OPP) (Ref. 13/0117/O) as amended by planning permission reference 16/3025/MA. The outline scheme set the parameters for the quantum of development, range of uses, maximum building heights and massing together with hierarchies of open spaces and circulation routes. This application for reserved matters has been assessed concurrently with planning permission 24/0887/NM which proposes amendments to the outline planning permission and parameter plans. Accordingly, the parameter plans submitted under 24/0887/NM have been relied on by the applicant and officers in the consideration of this reserved matters application.

#### Summary of amendments under 24/0887/NM

- 6.3 As set out in the applicant's Planning Statement, Changes in regulations, standards, policy and guidance since 2013 have led to a considerable reduction in achievable residential floor space and the total number of homes within Plots D and K scheme, if constrained by the approved parameter plans under the extant OPP. Plots D and K have been designed to meet emerging fire design requirements under the 2022 Building Safety Act and London Plan Policy D12, which requires the safety of all building users and for all development proposals to achieve the highest standards of fire safety, while further meeting London Plan Policy D5 requiring the provision an evacuation lift to facilitate dignified escape. The Proposed Development has been designed to meet the new 2023 Building Regulations, specifically Part F (Ventilation), Part L (Conservation of Fuel & Power) and Part O (Overheating), which require an incremental increase in overall building height as additional service height is needed on every floor. This increase in height is accommodated through the proposed amendments under ref: 24/0887/NM and are assessed under that application.
- 6.4 As set out in the applicant's Planning Statement, Building K1 has been proposed to be removed as part of the amendments being considered under ref: 24/0887/NM. The removal of Building K1 enables the land to become additional publicly accessible green space by extending Maribor Park to Beresford Road, creating a clear connection from Woolwich Town Centre down to the River Thames. The applicant also considers the removal of K1 also significantly improve the visibility and setting of the adjacent Grade I listed Royal Brass Foundry.
- 6.5 As set out in the applicant's Planning Statement, Building K2 is not part of this RMA submission. It is proposed to be incorporated into an extension of the consented Purpose Built Student Accommodation (PBSA) scheme on the

adjacent former Catholic Club site, which the applicant considers creates a more coherent townscape through reducing changes in building typologies and a reduced height close to Woolwich Town Centre. The extended PBSA scheme would be subject to a separate planning application by the relevant new landowner.

#### Residential Provision

- 6.6 The original Outline Planning Permission (OPP) (ref: 13/0117/O as amended by ref: 16/3025/MA) approved a total of 2,032 residential homes. Plot B includes 562 homes and Plot A includes 780 homes, leaving a total of 690 homes remaining within the extant OPP.
- 6.7 The Proposed Development falls within this overall number of homes remaining within the OPP, comprised of 663 homes being provided on Site, but the intention for the provision of 25 affordable homes off-site at the Kidbrooke Village Masterplan, giving a total of 688no. homes if that occurs. The acquisition of the 25 dwellings at Kidbrooke Village by the Council is yet to be formally agreed and discussions are ongoing between Council officers and Berkeley Homes, with heads of terms agreed for the acquisition of the 25 homes at Kidbrooke Village. Of the 663 homes being provided on Site, 382 are private sale homes and 281 are other types of affordable housing product. However, the private residential occupation restrictions in the S106 legal agreement attached to the application site continues to secure 306 affordable housing dwellings and this will continue to be the case unless and until offsite provision of 25 affordable housing dwellings is formally agreed by the Council.
- 6.8 The proposed residential homes are split across the Proposed Development, within seven buildings (Buildings D1, D2, D3, D4, D5, K3 K4 and K5), comprising a variety of size and mix of homes, with the intention of creating a mixed and balanced community.

#### Affordable Housing

- 6.9 The s106 Agreement connected to the extant OPP sets the requirements for affordable housing provision for this remaining phase as 306 (46%) affordable homes to be delivered in this final phase of the Waterfront Masterplan, of which 115 (38%) are Affordable Rent (AR), 101 (33%) Shared Ownership (SO) and 90 (29%) Discount Market Sale (DMS) tenures.
- 6.10 The applicant intends to deliver the affordable provision of 306 dwellings secured by the S106 Agreement for the application site as follows:
- 281 affordable homes on-site (confirm split) of which 90 are AR, 101 are SO and 90 are DMS, in a variety of sizes and located as follows:

- Building D1 – 69 DMS
- Building D2 – 3 DMS
- Building D5 – 101 SO
- Building K3 K4 – 90 AR
- Building K5 – 18 DMS
- The intention is for 25 affordable homes (3+ bedroom homes) off-site at Kidbrooke Village, but this is yet to be formally agreed by the Council, but the total remaining 306 affordable dwellings will continue to be secured by the S106 Agreement unless and until the Council formally agrees to the offsite provision.

#### Unit Mix

- 6.11 As detailed in the submitted accommodation schedule, the proposed mix of homes, including market rate and affordable housing, is as follows:
- 1B1P: 35 (5.3%)
  - 1B2P: 253 (38.1%)
  - 2B3P: 125 (18.9%)
  - 2B4P: 180 (27.1%)
  - 3B5P: 70 (10.6%)
- 6.12 A total of 71 adapted and accessible homes are proposed, within Buildings D1, D2, D3, D4, D5 and K5.

#### Non-residential floorspace

- 6.13 The Proposed Development includes a total of 959.1sqm of non-residential floorspace, split across 4no. units. The application indicates that the future occupants of these units have not yet been determined. The breakdown of locations and floorspaces are set out below:
- D3 – Non-residential (Class E / F1 / F2) use (indicatively could be a coffee shop / gym) = 288m<sup>2</sup>
  - D5 – Non-residential (Class E / F1 / F2) use (indicatively could be an office) = 401m<sup>2</sup> (over two storeys)
  - K3/4 – Non-residential (Class E / F1 / F2) use (indicatively could be retail / office) = 158.8m<sup>2</sup>
  - K5 Non-residential (Class E / F1 / F2) use (indicatively could be retail / office) = 111.3m<sup>2</sup>
- Total – 959.1m<sup>2</sup>
- 6.14 As part of a ground floor activation strategy, the four non-residential spaces proposed are located on key corners of buildings. Entrances to buildings are also strategically located to ensure that there is good natural surveillance and activity around The Ropeyards.

#### Fire safety

- 6.15 The Proposed Development comprises of seven buildings (D1, D2, D3, D4, D5 and K3 K4 and K5) that are all above 18m in height. Two staircases and three lifts are included in each building, with Building K3 K4 being provided with four lifts, which the application indicates is to comply with the highest standard of fire safety. The Planning Statement advises that the third lift serving the secondary staircase is capable of being either firefighting or evacuation. Protected lobbies, which are all separately ventilated, are located by the lift and stair in each building. The communal corridors are also separately ventilated. Within the protected lobbies a wheelchair zone (1500x1500mm) and a refuge zone (1400x900mm) has been provided for, alongside the refuge communications required. A smoke shaft is also provided within each protected lobby.

#### Basement layout

- 6.16 Given the change in levels, the car parking area located under Plot D is accessed at street level on the north and extends to a partial basement area to the south which provides car parking, cycle storage, plant and other ancillary spaces.
- 6.17 Car parking has been reduced from 144 spaces compared to 253 spaces approved under the outline planning permission. The submission advised that this change is intended to:
- reduce car parking and in line with RBG's target of achieving carbon neutral by 2030 as set out in the 'Carbon Neutral Plan 2021-2030', and
  - reduce use of concrete (and consequently cement) and consequently reducing the amount of embodied carbon within the scheme.

#### Design and appearance

- 6.18 The design features two building groups the D Blocks and K Blocks which each have unique elements but are designed to complement each other and response effectively to the surrounding context. The proposed building are proposed to be primarily finished in:
- Plot D Buildings D1 and D2 - Black colour crittal style window, Metal balustrade black colour, White sill detail, Featured entrance chamfered wall and soffit, Brown/red multistock brick finish, Black brick finish;
  - Plot D Buildings D4 and D5 - Double soldier course detail alternating two brick finish tones, Standard stretcher bond detail alternating two brick finish tones, Window and door frames dark olive colour, Black brick finish soldier course detail, Feature balcony: combination of metal railing balustrade and solid metal side panels Dark olive colour, and

Detail around window reveals: chamfered brick finish and alternating tone;

- Plot D&K Buildings D3 and K5 - Window and door frames dark olive colour, Metal railing balustrade and solid metal side panels. Dark olive colour, White brick finish windows surround, Black brick finish, Brick finish, White brick finish banding with recess black brick underneath, Soldier course detail alternating two brick colours; and
- Plot K Buildings K3-4 - Banding to match metal work colour at ground floor, Window frame olive colour, Combination of metal railing balustrade on top and solid metal panel at the bottom. Colour to match window frames and main entrance door, Soldier course detail, Dark red multi-stock brick finish, Double soldier course reveal, and Coloured metal to match tone of the brick finish and horizontal banding on upper level.

6.19 The proposed homes have been designed to meet the National Minimum Internal Space Standards and Policy D6 in the London Plan. Private amenity space in the form of balconies or private terraces have been provided in accordance with Policy D6 in the London Plan.

6.20 Future residents of the homes located with Plot D also have access to the semi-private landscaped podium areas and all residents can easily access the new Maribor Park.

Landscaping, public realm and play space

6.21 The Proposed Development includes the new Maribor Park, measuring approximately 0.85 hectares in size, which sits between the D Blocks to the north east and the K Blocks to the south west and will be a publicly accessible link from Beresford Street to the south of the site through to the Thames riverside pathway to the north of the site.

6.22 A total quantum of 1,884m<sup>2</sup> play space is provided, broken down into:

- 853m<sup>2</sup> for 0-4yrs old,
- 633m<sup>2</sup> for 5-11yrs old,
- 261m<sup>2</sup> for 12-15yrs old and 1
- 38m<sup>2</sup> for 16-17yrs old.

An additional 175m<sup>2</sup> of playspace is also provided, as part of the requirements from previous development phases at Plots A and B.

6.23 A Biodiversity Net Gain Assessment has been undertaken and submitted with the application. This demonstrates a combined net gain in habitat units of 62.06% (2.23 units) and a hedgerow units net gain of 1897.55% (0.19 units).



The proposed development would achieve a Urban Greening Factor of 0.4, meeting the London Plan policy requirement.

Transport, access, parking and servicing

- 6.24 There are a total of 142 car parking spaces proposed. There are 127no.car parking spaces proposed within the basement of Plot D. This includes 7 blue badge spaces. There are 15no. on-street accessible car parking bays provided, along with 4no. loading bays within the public realm. This is a car parking ratio of 0.21 spaces per home, and a reduction from the original OPP, which had a car parking ratio of 0.35
- 6.25 Cycle parking has been provided in line with London Plan Policy requirements and consideration has also been given to the London Cycle Design Standards, as well as Secure by Design standards in relation to the size, location and separation of secure cycle parking facilities. In total, 1,262 residential cycle parking spaces are provided, along with visitor cycle parking comprising 7no. short stay stands serving Plot D and 4no. short stay stands serving Plot D. In addition, 34 non-residential cycle spaces, long stay and short stay, are provided to support future non-residential uses.

Sustainability, energy, and overheating

- 6.26 This planning application is supported by a Sustainability Statement and Energy Statement, prepared by Hodkinson. The Sustainability Statement considers that the Proposed Development is sustainable, and this has been achieved by the incorporation of sustainable design and construction methods, energy and water saving measures, waste reduction techniques as well as measures to enhance the ecological value of The Ropeyards.
- 6.27 The Energy Statement confirms that the Be Green requirement for a 35% regulated CO2 emissions reduction beyond the Part L (2021) baseline has been achieved. This builds upon compliance with the respective 10% and 15% Be Lean requirements for residential and non-residential spaces. The Energy Statement confirms that to achieve a Zero Carbon standard, an offsetting contribution for the remaining regulated emissions has been calculated at £465,865. However, to enable a flexible approach to delivery, the applicant has agreed to a contribution of £989,000 equivalent to a 50% reduction in emissions which could be reduced subject to the performance of the delivered scheme.
- 6.28 One of the central commitments of the Applicant is to connect all buildings in The Ropeyards to the existing Royal Arsenal Riverside heat network, according with the London Plan requirement for connection to and further

development of the site-wide heat network. To facilitate compliance with the project requirements, the network is decarbonising with the installation of air source heat pumps (ASHPs) outside The Ropeyards Site, as per the RBG and GLA approved strategy. In this way a single site network is retained and low carbon heating is prioritised.

- 6.29 The Applicant is committed to carrying out energy monitoring and reporting at each stage of the development: planning, construction and in-use to enable the RBG and the GLA to record the estimated and actual energy uses in new developments, helping to achieve net zero-carbon buildings and providing a number of environmental benefits.
- 6.30 A Dynamic Overheating Report has been prepared by Hodkinson and is included within the main Energy Statement. The report assesses the performance of homes and communal corridors proposed against the Chartered Institution of Building Services Engineers (CIBSE) Planning Statement Royal Arsenal Riverside, The Ropeyards, Plots D and K P-28 guidance TM59 Design methodology for the Assessment of Overheating Risk in Homes (2017) and Approved Document O Overheating (2021).

#### Environmental considerations

- 6.31 The original OPP (Ref: 13/0117/O) included a full Environmental Impact Assessment, and the extant OPP (Ref: 16/3025/MA) was accompanied by an ES Addendum, to update technical matters where applicable. An EIA Screening Request was submitted to the Council on 30 November 2023 (Ref. 23/3844/EIA) and on 5 January 2024, a response was issued by planning officers agreeing the proposed scope of the environmental compliance review for the forthcoming reserved matters submission.
- 6.32 The submission includes an Environmental Compliance Report, prepared by Plowman Craven, with other inputs from technical consultants. The ECR has been prepared to demonstrate that the Proposed Development meets the commitments made in the previous Environmental Assessments and that the proposed mitigation measures remain applicable and demonstrate that either the residual effects of the detailed scheme are unchanged or better than those reported in the previous Environmental Assessments.

## **7. Consultation**

- 7.1 The application since being submitted on 12 March 2024 has been subject of public consultation, comprising of a press notice dated 19/03/2024, four site notices dated 2/04/2024, and one thousand eight hundred and five (1,805)

individual letters, sent to individual occupiers in the vicinity of the application site. This also included consultation with statutory bodies and local amenity groups.

- 7.2 112 consultation responses (comprising 110 objections, two comments of support, and one comment of partial support) have been received from local residents and businesses and these are reported in section 7.5.

### 7.3 Statutory / External Consultees

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

<b>Consultee:</b>	TFL Safeguarding (NB TFL Spatial Planning Comments outstanding)
<b>Date received:</b>	5/04/2024
<p>Please note that ‘Crossrail’ conditions were applied to the outline planning permission 13/0117/O dated 19 June 2013, Conditions 49 and 49. These conditions would be relevant for each phase of the development as and when a planning application for the development phase was submitted to the local planning authority.</p> <p>The outline conditions were applied during the construction. Crossrail, now the Elizabeth line, was completed and became fully operational in 2015. At the same time the Crossrail conditions were revised to take into account the operational status of the railway.</p> <p>The local planning authority is therefore, requested to take account of the conditions applied to the outline planning permission but refer to the revised ‘Elizabeth line’ conditions, referenced below, when considering the grant of planning permission for the above application, as submitted:</p> <p><b><u>Elizabeth line condition for foundation design and settlement</u></b></p> <p>CI None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which: -</p>	

- (i) Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail),
- (ii) Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i) and C1(ii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.

**Elizabeth line Informative - transmitted groundbourne noise & vibration**

- II The Developer is recommended to assess and mitigate the possible effects of noise and vibration arising from the operation of the Elizabeth line.

**Officer comments on consultation response:**

Noted, the conditions referenced remain in place under the revised outline planning permission and applicable to this development.

<b>Consultee:</b>	Natural England
<b>Date received:</b>	26/03/2024
No comment	
<b>Officer comments on consultation response:</b>	
Noted	
<b>Consultee:</b>	Environment Agency
<b>Date received:</b>	17/06/2024
Summary The Environment Agency are not a statutory consultee for reserved matters applications. We understand that outstanding planning conditions with respect to Plots D & K include, but are not limited to:	

- condition 23 (contamination – preliminary risk assessment; site investigation scheme, risk assessment; site investigation, risk assessment, options appraisal, remediation strategy; verification plan);
- condition 24 (verification report);
- condition 25 (unexpected contamination);
- condition 31 (piling method statement);
- condition 54 (finished floor levels);
- condition 62 (surface water drainage scheme);
- condition 63 (ecological mitigation, compensation and enhancement scheme);
- condition 64 (landscape and ecology management plan);
- condition 67 (infiltration of surface water drainage).

We have **no objection** to the approval of reserved matters as submitted, providing the submitted details do not preclude the fulfillment of the aforementioned planning conditions.

We provide these comments on the understanding that the approval of said reserved matters would not alter that the aforementioned planning conditions remain outstanding.

We would seek to be consulted on the discharge of any planning conditions requested by the Environment Agency, including the aforementioned planning conditions.

**Officer comments on consultation response:**

Noted

<b>Consultee:</b>	Network Rail
<b>Date received:</b>	25/03/2024
No comment	
<b>Officer comments on consultation response:</b>	
Noted	

<b>Consultee:</b>	Historic England – GLAAS
<b>Date received:</b>	5/04/2023
Summary:	
No objection raised to the submitted information and the proposed reserve matters application, subject to the submission of full materials to discharge the archaeological conditions attached to 16/3025/MA.	
<b>Officer comments on consultation response:</b>	
Noted.	

<b>Consultee:</b>	Health and Safety Executive (HSE)
<b>Date received:</b>	8/04/2024
<b>Summary :</b> Headline Response from HSE: ' <b>content</b> ' <p>HSE welcomes the provision of two separate stair cores in each building and that each stair core is designed as a firefighting core.</p> <p>Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.</p>	
<b>Officer comments on consultation response:</b> Noted	

<b>Consultee:</b>	Met Police DOCO
<b>Date received:</b>	3/05/2024 and 22/04/2024
<b>Summary:</b> No objections raised. <p>Because the development is suitable to achieve Secured by Design accreditation, I would seek to have a 'Secured by Design' condition attached to any permission that may be granted in connection with this application. I would request the planning condition is in two parts so each relevant part can be discharged at the correct time.</p> <p>1. SBD Measures.</p> <p>The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.</p> <p>2. Secured by Design Certification.</p> <p>Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the local planning authority.</p>	

**Officer comments on consultation response:**

The conditions applicable to the development include condition 18 (security) attached to Ref: 16/3025/MA, which relates to achieving a Secured by Design Certificate within three months of the completion of the relevant phase of the development. Condition 18 attached to ref: 16/3025/MA will ensure the development proceeds in accordance the recommendations of the DOCO.

<b>Consultee:</b>	Thames Water
<b>Date received:</b>	9/05/2024
<b>Summary of consultation response:</b> No comments to make at this time.	
<b>Officer comments on consultation response:</b> Noted	

<b>Consultee:</b>	NHS
<b>Date received:</b>	9/05/2024
<b>Summary of consultation response:</b> No comments to make at this time.	
<b>Officer comments on consultation response:</b> Noted.	

<b>Consultee:</b>	TFL
<b>Date received:</b>	9/05/2024
<b>Summary of consultation response:</b> Visitors cycle parking should be provided directly outside the residential lobby of Block D, at the end of the loading bay, which is closer to the entrance than the current proposed provision.  The minimum 5% provision for larger cycles appears to be met in the totals. However, on examination of the plans, it seems that these spaces are often clustered in one store. We would expect the recommended mix of stands in each store, so that for example a disabled resident doesn't need to park in a separate store from their non-disabled companion or children." This aspect of the proposals fails to demonstrate inclusive design and it is recommendation is that you seek further improvements or recommend refusal.  Sheffield stands mounted under a top tier stands are not supported and the design should be revised to eliminate this. While the space constraints of the outline planning permission are cited by the applicant, the space	

constraints for block D could be addressed by reducing the car parking, and in block K by a degree of redesign.

The London Plan is clear that lockers are acceptable in addition to the minimum quantum standards, but cannot count toward that minimum. If they are requested by the Council's own standards, they should only be considered as additional to the minimum.

The proposed arrangements for accessing cycle stores (ie with primary access from public realm or car park) is sub-optimal. If you are to accept them, I recommend you secure (as already requested):

1. Residents must be permitted to take their cycles through the lobby. We consider it appropriate for this to be secured in some way.
2. The doors between the cycle store and lobby will need to be motorised obviously, but are all relatively narrow. We recommend 1.2m width to allow for easier access for cyclists, particularly given that they almost always require a 90-degree turn at the same time.

While safety concerns are raised with the shared surface, this is for the Council Highways Department to consider.

A sitewide travel plan is supported.

**Officer comments on consultation response:**

The Highways Department have agreed safety concerns can be adequately resolved through the approach set out in the submission, including restricting general traffic from the shared surface with the use of bollards, and the addition of signage which the applicant has agreed to.

Officers consider TfL's other concerns can be addressed through amendments to the recommended conditions of consent and a site wide travel plan is secured through the existing s106 agreement.

## 7.4 Council Departments

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

<b>Consultee:</b>	Early Years
<b>Date received:</b>	3/04/2024
No comments to make at this time.	
<b>Officer comments on consultation response:</b>	
Noted	



<b>Consultee:</b>	Waste Strategy
<b>Date received:</b>	20/09/2024
<b>Summary:</b> Subject to the amendments made and assurances provided by the applicant, no objection is raised.	
<b>Officer comments on consultation response:</b> Noted.	

<b>Consultee:</b>	Sustainability Comment
<b>Date received:</b>	1/05/2024
<b>Summary of consultation response:</b>  <b>I. The Energy/Sustainability general informatives</b> <b>I.1 <u>Energy Strategy evaluation</u> – general informative (for the Council and the Applicant)</b>  The Council do not object to the proposed energy strategy produced by Hodkinson in March 2024 (v1).  The Ropeyard will connect to the existing Royal Arsenal Riverside heat network. Currently the network is served by CHP and Gas boilers, but there is a longitudinal decarbonisation strategy in place which will see the gas systems replaced with ASHP. The “be Clean” carbon reductions are based on this ASHP scenario. The plan is to separate Ropeyard from the wider RAR network with heat exchangers which will allow the site to operate at a lower and more carbon efficient temperature. In this way 100% of the Ropeyard heat demand can effectively come from the ASHPs with a predicted system efficiency (SCOP) of 2.7.  Variable Refrigerant Volume (VRV) Air Source Heat Pumps will provide heating and cooling for the commercial space.  PV has been realistically maximised with arrays located on the blocks with a combined capacity of (approx) 169 kWp.  An <u>Overheating Analysis</u> with proposed mitigation measures has been submitted. The analysis assumes full mechanical ventilation and heat recovery (MVHR) with additional bypass cooling in units with potential noise issues. It is compliant with Part O (TM59/Guide A) and follows the TM49 methodology of modelling against the DSY1 average summer year (2020) weather data files, as well as the more intense (but non-mandatory) DSY2 (2003) and DSY3 (1976) data files. All rooms comply with TM59 for criteria (a) and (b) when modelled against DSY1.	

The Strategy has been assessed against Building Regulations Part ADL 2021 using SAP 10.2 emission factors, and follows the London Plan policy SI2/SI3 “Lean, Clean, Green, Seen” energy hierarchy. All main construction elements meet or exceed current B Regs minimum U value efficiency and thermal bridging standards.

#### Energy hierarchy conclusions and confirming compliance

At the current design stage the overall site-wide CO<sub>2</sub> emissions will be cut by at least 76.46% against BR Part L 2021 (using SAP10.2 emission factors), with 13% through “Lean” efficiency measures, 63.34% “Clean” reduction through connection to the (decarbonated) RAR heat network, and 0.12% through “Green” renewable energy PV.

There is a shortfall of 4,902 tonnes CO<sub>2</sub> (over 30 years) in the zero-carbon that will be mitigated through an “offset” S106 payment at £95 per tonne to the Council of £465,865. However, a minimum carbon emissions reduction of 50% beyond Building Regulations Part L 2021 and using SAP10.2 emission factors and associated offset payment of £989,000 would be acceptable as this approach is consistent with the London Plan (2021) and GLA contained within Table I of the GLA Energy Assessment Guidance (2022).

If after one year of in-situ monitoring the PV does not deliver, within a reasonable margin of error, the carbon reductions predicted in the Energy Strategy then the Developer may need to pay an additional Carbon Offset contribution to mitigate some or all of the shortfall.

The London Plan (policy SI2) introduces a fourth step to the existing (be Lean, Clean, Green) energy hierarchy of “be Seen”. In addition to the GLA 'be Seen' policy, Greenwich Council also requires the additional physical monitoring, and daily performance analysis, of the renewable/low-carbon energy through an automated monitoring system. This is to ensure real-time in-situ compliance with the Council and the Mayor’s renewable energy policies and to enable the effective longitudinal maintenance and operation of the equipment.

In line with this, Greenwich Council will require the monitoring of the PV arrays to evaluate their performance for a period of 5 years. Suitable monitoring devices must be fitted by the Applicant to achieve this in consultation with the Council. The Applicant will be required to sign a Legal Agreement contract with the Council to implement the monitoring process, and a S106 contribution may be sought for this.

Energy monitoring devices required to carry out the monitoring are:

- PV (GPRS) smart meters.
- SIM card and data processing (5 years).

## 1.2 Whole Life Carbon, Circular Economy, and BREEAM

The Whole Life Carbon (WLC) strategy produced by Hodkinson in March 2024 (v3) confirms that the development will be comfortably compliant with the GLA Benchmark targets. Modules A1-A5 should achieve 567 KgCO<sub>2</sub>e/m<sup>2</sup>, and B1-C4 (excluding B6/B7) 330 KgCO<sub>2</sub>e/m<sup>2</sup>, with a total carbon emissions baseline scenario (over 60 years) of 886 KgCO<sub>2</sub>e/m<sup>2</sup> (including sequestration).

The Circular Economy (CE) statement produced by Hodkinson in March 2024 (v5) confirms that the development will be aim to exceed baseline compliance with London Plan targets by diverting 98% of demolition/construction waste from landfill, putting 98% of excavation materials to beneficial on-site use, and supporting the diversion of at least 65% of Operational Waste from landfill by 2030.

The BREEAM pre-assessment report (Appendix A, Hodkinson Sustainability Statement) states that the non-residential element will achieve a BREEAM “Excellent” rating with a predicted score of at least 71.55%.

### **Officer comments on consultation response:**

While the submission details the proposed carbon emissions reduction at a rate of 76.46% against BR Part L 2021 (using SAP10.2 emission factors, the applicant has requested that a flexible approach be taken to the condition wording and offset payment should the development marginally fall short of meeting this target. In the interest of avoiding the need for amendment to the planning permission in the future, and on the advice of the Councils sustainability consultant, the Council have agreed to a condition requiring a minimum carbon emissions reduction of 50% and heads of terms requiring an offset payment of £989,000, which could be reduced based on the performance of the delivered scheme. For clarity, the applicant has confirmed that the intention is not to reduce to the 50% level, but the condition wording enables some flexibility through the detailed design process should the scheme fall short of the 76% carbon reduction target as set out in the submitted energy statement.

The Council’s sustainability consultant has confirmed that this approach, which establishes a minimum carbon emissions reduction of 50% beyond

Building Regulations Part L 2021 and using SAP10.2 emission factors, is consistent with the London Plan (2021) and GLA contained within Table I of the GLA Energy Assessment Guidance (2022) and therefore officers consider this is acceptable.

To support that the development proceeds as detailed in the submission, heads of terms and conditions of consent are recommended and these are included in section 25 of this report and in the appendices.

<b>Consultee:</b>	LLFA
<b>Date received:</b>	23/04/2024
<b>Summary of consultation response:</b> The evidence provided by the applicant in support of this reserved matters application has been reviewed and we do not object to the release of Condition 2 as it does not seek to amend or address any of the conditions attached to planning permission 16/3025/MA which relate to flood risk and drainage.	
<b>Officer comments on consultation response:</b> Noted.	

<b>Consultee:</b>	Environmental Protections – Contamination
<b>Date received:</b>	8/05/2024
<b>Summary of consultation response:</b> No comment subject to adherence with conditions to ensure the site is developed 'suitable for its intended use'.	
<b>Officer comments on consultation response:</b> Noted.	

<b>Consultee:</b>	Environmental Protections – Noise
<b>Date received:</b>	8/05/2024
<b>Summary of consultation response:</b> No objections raised.	
<b>Officer comments on consultation response:</b> Noted.	

<b>Consultee:</b>	Highways
<b>Date received:</b>	19/11/2024
<b>Summary of consultation response:</b> Concerns are raised with Block K and associated balconies encroaching on the public highway and this issue needs to be resolved.	

The lack of contribution towards cycle improvement is disappointing and does not demonstrate a willingness to promote active travel. While what is considered to be more of a secondary route is described to the Ferry it is clear that this is not the only route likely to be used. As mentioned before the route along the A206 is more likely to be preferred and with a reduction in car parking it is expected that there would be an increase in cycling as an alternative mode.

The additional signage for the service road should be conditioned.

The unorthodox loading bay should be supported by a Safety Audit.

It is not understood why the area adjacent to the roundabout on Beresford Street cannot provide a simpler and improved public realm layout. The area is included within the red line boundary and work could be carried out via a s278 for works in the highway. The current layout relates to a previous arrangement that was used for servicing following the alteration of the original roundabout design but no longer has same the relevance. The egress from the underground car park requires vehicles to travel through park area and would therefore be better relocated nearer the access.

It is noted that the main spinal footpath/cycle way that runs through the park area would encourage those users to cross the New Warren Lane at its widest point especially as there are paths on either side. As such the introduction of an island for the pedestrians is supported. The island would provide a safe refuge to enable vulnerable users to make two crossings safely. Indeed if the whole area is subject to a raised table it will encourage crossing at that point and the length of the table will have little effect on vehicle speed. It is recommended that a safety audit is commissioned.

**Officer comments on consultation response:**

The encroachment of Block K onto the public Highway would need to be resolved through a separate process to this planning application, and therefore despite any outcome of this application the applicant would need to achieve the relevant stopping up order for partially building on the highway most probably under S247 of the Town and Country Planning Act 1990 and highways oversailing licence under the Highways Act 1980 in relation to this aspect of the scheme before carrying out the relevant part of the development. However, the Council's Planning Board has to consider the highways and other implications and impacts of these aspects of the proposal in considering this application.

A safety audit of the layby and recommended pedestrian island, and an appropriate redesign of these spaces of the scheme, is supported in the recommended conditions of consent.

A redesign of the pedestrian realm to the north of Block K is secured by condition and the implantation of upgrade works would be delivered through a s278 agreement and this is secured through the recommended heads of terms.

<b>Consultee:</b>	Urban Design
<b>Date received:</b>	15/07/2024

**Summary of consultation response:**

**I. Layout**

The proposed landscaping of the linear park is underpinned by an interesting concept linked to the geological character and history of the site. It models the topography of the site in a way to create a diverse range of habitats and landscape typologies.

The more formal design and shallow character of vegetation on the raised podiums is suitable for these spaces positioned above the enclosed carparking.

The interface of the park with New Warren Lane should be further detailed at the next stage.

The loading bays and accessible carparking on Duke Wellington Avenue and New Warren Lane would have some negative impact on the spatial and environmental quality of these routes. Nevertheless, they have been acceptably integrated with interposed trees and shrub planting. The designed hedge planting assist in defining adequate defensible space in front of the maisonette units on New Warren Lane.

A more natural material than resin bound gravel could have been explored for part of the designed play area, more coherently with the organic and naturalistic character of the park and foster more informal, intergenerational play.

The proposed arrangement of buildings on the site is not objected to as in keeping with the approved masterplan.

In keeping with the pre-application stage, the removal of the low-rise links is not objected to in principle. However, the original concept presented at the first pre-app meetings of green steps with vegetation visually climbing onto the designed communal open-spaces hasn't been translated very effectively in the submitted proposals. Due to the necessity of providing natural ventilation to the enclosed garage, the steps have been replaced with a street-level low-wall and planter, with its vegetation partially concealing the garage passive wall and ventilation grids. The southern frontage of Blocks Ds is partially activated by the corner commercial units and central lobby to Block D2. Generally, the revised layout in this area presents some weaknesses which needs to be considered holistically with all identified issues and benefits.

The street frontage of Blocks Ds on Duke of Wellington Avenue and new Warren Lane is negatively affected by the designed enclosed carparking, bin stores and bike stores. Nevertheless, the proposed commercial units, residential units and communal entrances on these sides have been distributed in a way to provide sufficient activation on the most prominent points of the site.

The ground floor residential units facing New Warren Street should be carefully scrutinised in terms of their available sunlight/daylight.

The ground floor of Blocks Ks on Beresford street and the park are negatively affected by the concentration of bin stores, plant rooms and bike stores. In these terms, the side-to-side communal lobbies are beneficial to partially mitigate this issue and provide some visual connection between Beresford Street and the park. The designed corner commercial-units have been thoughtfully positioned to activate the most prominent points of the overall building approaching from Woolwich Church Street and eastern Beresford Street.

The chamfered corners of the building are beneficial to invite pedestrian into the masterplan and avoid any excessive bottleneck on the sidewalk, particularly at the junction of Beresford Street and New Warren Lane. The internal lane providing vehicular access and blue-badge carparking to the north of Blocks Ks has some negative impact on the intended pedestrian and naturalistic character of the linear park. A condition should be included to ensure that this lane is effectively detailed as an integral element of the landscape strategy.

Regarding the upper floors of Blocks Ds, the introduced gap between D1 and D5 is beneficial to slightly increase the percentage of dual aspect units on these blocks in comparison to the outlined layout in the approved masterplan.

The chamfered corners between the adjoining blocks D2 and D4 are beneficial to create enhanced single aspect units with more appealing outward views. The number of single aspect and enhanced single aspect units on the type floors of the buildings exceed 50% of all units on blocks Ds, which is far from ideal in design terms and not in line with the recommendations from the London Plan and GLA Housing Design Standards. However, it is understood that these weaknesses originate from the approved masterplan. It is noted that no single aspect-north facing unit is proposed in blocks Ds. Only Block D1 exceeds the maximum of eight units per floor recommended by the LPG, incorporating ten units per type floor.

Regarding the upper floors of Block Ks, some concern is raised on the long internalised corridors serving the residential units in blocks K3 and K4. This arrangement results into a high percentage of single aspect units, including north-east facing units in the overall type floors of blocks Ks, exceeding 50% of the total. Again, it is understood that this is in line with the approved masterplan.

The proposed mix of projecting and recessed balconies on the park side are beneficial to maximise the advantages from the proximity to the park and assist in the design of the form of the buildings.

The designed projecting balconies on the busy Beresford Street are less convincing, specifically on the lower floors. Recessed loggias would have been a more appropriate response on the lower floors of the building. It is noted that the projecting balconies on Beresford Street are not in keeping with the Masterplan layout, which incorporates recessed balconies on Beresford Street and projecting balconies on the park side. The projection of the balconies over the public realm is also reason for concern. An agreement on this issue should be found with the Council prior to submission.

In conclusion, the outstanding issue regarding the proposed layout is the interface of Blocks K3 and K4 with Beresford Street. No objection is raised regarding the acceptability in design terms of the rest of the designed layout.



## **2. Massing and form**

All proposed blocks have been increased in height by three metres (exception made for Block K5, which is increased by 3.5m) in comparison to the approved masterplan, equivalent to a single residential storey.

The proposed heights are generally suitable for the surrounding context. The increased height of Blocks D1 and D2 would create a slightly starker difference in height with the neighbouring Grade II\* Royal Arsenal Verbruggens House (The Board List Entry Number 1078957) and the Grade II\* Royal Laboratory West Pavilion (List Entry Number 1245208). However, it would sit peripherally on the main views of the listed building approaching from No 1 Street. Moreover, it is noted that the existing Riverside Towers sits in the background of the listed building on these views and have already established the principle of coexistence of buildings of different scales and periods in this part of the Royal Arsenal.

The proposed Blocks D1 and D2 are overall coherent with this emerging character.

The introduced gap between Blocks D1 and D5 is beneficial to avoid any excessive monolithic feel across the two buildings and provide a better and more balanced background of buildings to the views of the two Grade II listed Royal Laboratories, neighbouring the site to its east, from No.1 Street and their communal courtyard.

The slightly increased height and footprint of Block D3 slightly exacerbates its sense of proximity to the neighbouring block B of the Riverside towers and the perceived pinch point at the street level, due to the limited interposed distance in comparison to the heights of the proposed and existing neighbouring tower.

The increased height of Blocks K3 and K4 has some negative impact on how their bulk is perceived approaching from Beresford Street. The two blocks create a rather monolithic feel on this side, which is only in minor part mitigated by the designed subdivision of this overall form into smaller elements, using the setback of the designed staircases. The language of recessed balconies is more successful on the park side in these terms. The designed projecting balconies on both sides are beneficial to a certain extent to further mitigate the monolithic feel of the overall building.

No particular issue is raised on the massing and form of the taller element K5, which would provide a legible marker of the entrance to the masterplan together with the neighbouring Block A.

Overall, the main outstanding issue is in regard to the bulk and monolithic feel created by Blocks K3 and K4 on Beresford Street. It is understood that this should be considered holistically with all other identified issues and benefits provided by the scheme.

### **3. Architecture**

Blocks D3,D4 and D5 are designed as a legible family of buildings approaching from the linear park. Their brown/red multistock brick facades incorporate expressive detailing subtly referring to the history of rope making in the Royal Arsenal. These include the windows surrounds of Blocks D4 and D5, which incorporate a chamfered brick finish and double soldier course detailing, reproducing the feel of a rope by alternating two brick finish tones. The grouping of windows is thoughtfully balanced to legibly expressed the main parts of the buildings, including their base, middle and top.

Soldier black brickwork is selectively used to mark the lintels of doors and windows.

This overall language is slightly simplified on the taller block D3, which is marked by the white brick surrounds and interfloor fasciae, grouping adjoining floors and defining the rhythm on façade.

The metalworks of the buildings, including all windows, doors and balconies are expressed with a dark olive colour that would complement successfully the proposed brickwork. The designed balconies with frontal metal railings and solid side panels contribute to merging the three buildings with the warehouse styled blocks D1 and D2.

The recessed communal entrances to the buildings are marked by the chamfered brick elevation and soffit and generous doors with side windows. The warehouse styled architecture of Blocks D1 and D2 works well with the established character to the north of the site, defined by the neighbouring redd-brick mansion blocks, the historic Grade II\* The Board building and the warehouses of the Grade II Building 4I and 4IA Royal Laboratory Square buildings, now hosting Woolwich Works, with their full width Crittall windows.

The black finish of doors, windows and balconies are coherent with the warehouse style of the buildings. The white sill detail creates an appealing contrast with the dark colour of the windows.

The recessed entrances are marked by generous glazing incorporating the entrance door. Their chamfered elevations and soffits creates a legible relationship with the neighbouring blocks D3-D5.

The architecture of blocks K3, K4 and K5 is coherent with that of blocks Ds.

The superficial treatment of Block K5 is in keeping with Block D3, which creates a legible coherent character entering the masterplan from Beresford Street. Blocks D3 and D4 are expressed by an expressively textured dark-red brick, complemented by soldier courses and interfloor pre-cast fasciae.

The door and windows of ground floor and bike stores are finished with the same colour to effectively merge with the façade.

The recessed communal entrances are effectively marked with corbelled brick elevation.

Balconies are thoughtfully designed with partial solid balustrades, which improve their sense of privacy and separation from the busy street and creates a legible relationship and expression line with the height of the window sills. The olive colour of windows, doors and balconies works well with the brickwork and help to create a coherent character across the overall group of buildings.

While further improvement is recommended on Blocks Ks, the overall architecture of the scheme is considered acceptable in design terms.

#### **4. Conclusion**

As noted above some concern is raised in relation to Blocks Ks and an on balance determination is recommended in relation to this building. Leaving aside this issue, the rest of the scheme is considered acceptable in design terms.

A comprehensive condition should be included for all proposed materials and features on facade. Material samples should be provided for all visible materials and features on façade and in the public realm. Mock-up panels should be prepared for all type bay-walls. Detailed technical section drawings (scaled 1:5, 1:10 and 1:20) should be provided for all type walls and key interfaces between different components and materials.

**Officer comments on consultation response:**

The Urban Design Officers comments are discussed in full in section 16 of this report.	
<b>Consultee:</b>	Tree Officer
<b>Date received:</b>	11/11/2024
<b>Summary of consultation response:</b> No objections raised to the submitted landscape plan and planting details shown in the BNG submission.	
<b>Officer comments on consultation response:</b> Noted.	

<b>Consultee:</b>	Air Quality – Pollution Regulation Officer
<b>Date received:</b>	27/09/2024
<b>Summary of consultation response:</b> <i>All EP conditions previously imposed in relation to 16/3025/MA and 13/0117/O are remain the same.</i>  <i>However, an NRMM condition or air quality neutral condition should be considered now and imposed.</i>	
<b>Officer comments on consultation response:</b> Noted and this is supported in the recommended conditions of consent.	

<b>Consultee:</b>	Housing New Supply
<b>Date received:</b>	27/09/2024
<b>Summary of consultation response:</b>  <b>Affordable Housing</b> Housing New Supply Team (HNST) generally requires 35% Affordable Housing provision, with a compliant 70/30 split rented to shared ownership units. However, this application relates to the submission of Reserved Matters for Plots D and K (Buildings D1, D2, D3, D4, D5 and K3 K4, K5) and the remaining area of Maribor Park on the Royal Arsenal Riverside Site, Woolwich, known as the Ropeyards. The original Outline Planning Permission (Ref: 13/01170), approved in June 2013, secured approval for the erection of 2,032 residential homes and 2,442 sqm of non-residential uses. This was subsequently amended in March 2017 (Ref: 16/3025/MA), the extant Outline Planning Permission (OPP). Previous applications have been submitted and approved in relation to the Waterfront Masterplan, including RMAs for 'Plot B', the detailed design of the Waterfront Park, and 'Plot A'. The Ropeyards comprises the final phase of development under the extant Outline Planning Permission.	

The developer states that this application has been designed to comply with the Affordable Housing requirements under the 2017 S106 agreement connected to this existing Outline Planning Permission and therefore there are a total of 306 affordable homes to be delivered within this final phase, which are broken down as follows 115 affordable rent (38%) 101 shared ownership (33%) and 90 Discount Market Sale (29%).

This tenure mix would be acceptable as it relates to the existing s106 agreement.

### **Tenure Mix**

It is proposed that the tenure mix is delivered as follows:

281 affordable homes on-site, of which 90 are AR, 101 are SO and 90 are DMS, in a variety of sizes and the remaining 25 affordable homes (3+ bedroom homes) to be provided at Kidbrooke Village (offsite)

### **Site Layout – location of Affordable Housing**

The Affordable Housing will be spread across the scheme and located as follows:

Building D1 – 69 DMS units

Building D2 – 3 DMS units

Building D5 – 101 Shared Ownership units

Building K3/K4 – 90 Affordable Rent units

Building K5 – 18 DMS units

Overall, a total of 663 units will be delivered on site including the private market units, and the remaining 25 affordable homes (3+ bedroom homes) to be provided at Kidbrooke Village (offsite)

### **Unit Mix**

The Accommodation schedule indicates the following breakdown of affordable housing units:

	1b1p	1b2p	2b3p	2b3pw	2b4p	3b5p	Total
D1 (DMS)	0	40	14	14		0	68
D2 (DMS)	0	1			2	0	3
D5 (SO)	0	64	0	25	12	0	101
K3/K4 (AR)	0	9	9	9	27	36	90
K5	18	0	0	0	1	0	19
<b>Total</b>	<b>18</b>	<b>114</b>	<b>23</b>	<b>48</b>	<b>42</b>	<b>36</b>	<b>281</b>

\*The breakdown shown in the accommodation schedule is very slightly different from the description above with one fewer unit in block D1 and one more in block K5.

In terms of the mix of units provided within the development, generally a mix of Housing types and sizes will be required in all schemes, and they should contain a significant proportion of family sized properties i.e., three bedroom or larger.

There are a range of units included within the scheme, in this case there are a total of 36 x 3 Bedroom Affordable Rented (AR) units within the S106 onsite units that are to be included within the S106 offer, which equates to 40% of the AR Units.

In addition, the 25 units which are off-site provision of affordable rented units related to Royal Arsenal Riverside (RAR) to be provided at Kidbrooke Village are all three-bedroom units.

There is a need generally for 3-bedroom plus homes within the affordable housing as there is a continuing need for additional larger family sized units to accommodate existing applicants on the Council's Housing Register, which include 3 children or more and whose needs are not met by 2-bedroom units.

Within the accommodation schedule it indicates that the on-site rented units are all provided within Block K3/K4.

In terms of the proposed habitable room requirement under the S106 Agreement, according to Officers calculation there are a reduced number of habitable rooms within the revised unit mix. This reduction in habitable rooms needs to be explained and justified by the applicant in terms of planning requirements.

### **Rents**

It is understood that the Affordable rented units, and the off-site RAR units will be delivered at social rent i.e. Formula rent levels.

### **Space standards**

The Planning Statement indicates that all proposed units are designed to exceed the National minimum space standards, and the London Plan standards which is welcome.

### **Wheelchair accommodation**

In line with the London Plan guidance requiring all new residential developments to have minimum of 10% wheelchair adaptable homes 71 homes, have been proposed as M4 (3) with the remainder provided as M4(2).

The planning statement indicates that 9 will be wheelchair adaptable M4(3)a and 62 will be wheelchair adapted M4(3)b.

The accommodation schedule indicates that 9 of the affordable rented units are provided as wheelchair units. The requirement for the affordable rented units is that they should be wheelchair user dwellings fitted out ready for occupation, in line with M4 (3) 2b and secured by planning condition, where the local authority will be nominating the residents, and this would be the case regarding affordable rented accommodation.

The suitability of the design and layout in terms of M4(2), M4(3)a, and M4(3)2b is subject to the review of the Council's Occupational Therapist.

### **Car Parking**

The developer states that the site currently has a PTAL rating of 6a, which is highly accessible, it is situated close to the rail stations at Woolwich Arsenal and the Elizabeth line station and there is access to several bus routes and the Thames Clipper service.

There are 127 car parking spaces proposed in the basement of block D including 7 blue badge spaces, plus 15 on street accessible bays and 4 loading bays. The developer states that this equates to a car parking ratio of 0.21 spaces per home.

HNST would expect that car parking is provided to the affordable units in proportion and the affordable rented units which are fitted out for wheelchair use would have access to a disability parking space within a reasonable distance of their home if required.

### **Facilities management and service charge**

The Developer and the nominated Registered Provider will be required to minimize service charges for the affordable housing through appropriate integration and detailed design allied with effective management arrangements to be agreed with the Registered Provider.

Further response 20/09/2024

Looking at the information provided – my original query related to the fact that I understood the developer was counting a number of separate kitchens as habitable rooms, which in my view from a housing perspective was not correct. On that basis I did not include any kitchens in my calculations.

The information provided below confirms that there are 27 x 3 bedroom units where a separate kitchen has been counted as a habitable room, marked with an asterisk, and it seems that their inclusion has allowed the

Developer to state that they are providing a marginal increase in habitable rooms.

In HNS view this is really a planning consideration as we are not aware that there is any definition of “habitable room” in our local planning policy that would support us in pushing back against the inclusion of separate kitchens in the calculation. There is a definition of habitable room in the latest S106 template recently circulated, and it appears in some individual S106 agreements, however, it is not included in the S106 agreement relating to this scheme which dates from 2013.

Therefore, it appears that we have to accept their response on this point, although it would be a planning consideration, and you mentioned in a previous e mail that there may be other factors that could also potentially affect this calculation.

We don’t see that the inclusion of separate kitchens in the social rented units would be an issue in a practical sense, as that would be the case in many of the properties that RBG manage, and there will be some clients who would prefer this layout.

**Officer comments on consultation response:**

These comments are discussed further within the Officers report.

<b>Consultee:</b>	Occupational Therapist
<b>Date received:</b>	19/11/2024
<b>Summary of consultation response:</b> In light of the revisions made to the application and assurances made by the applicant, subject to the confirmation of compliance with Occupational Therapy requirements at the detailed design stage, no objections are raised.	
<b>Officer comments on consultation response:</b> Noted. This is supported through the extant conditions on the outline planning permission.	

<b>Consultee:</b>	Conservation Officer
<b>Date received:</b>	26/11/2024
The application site is only partially located within the boundaries of the Royal Arsenal Conservation Area; however, it falls within the visual site line of not only the Royal Arsenal Conservation Area, but also the Woolwich Conservation Area.	



The originally approval ranged between low to high range of buildings. The current proposal seeks approval for an additional one stories throughout the proposed development. There will be improvement to the visual setting of the new buildings, creating continuous vista from the east towards the Grade II Listed designated heritage asset (the Laboratory Building). The separation gap between each building has also been increased, reducing the continuous building lines and the visual bulk from the original approval. The tallest element of the development is located away from the immediate setting of the adjacent designated heritage asset. The proposed lay out of the buildings makes the overall buildings to be more permeable visually. The heritage benefits includes, the increased gaps between the new buildings, cut through towards the visual site-line of the Laboratory Building (Grade II Listed), de-coding the architectural pattern to reflect the history and the historic industrial use of the 'locality'.

Having assessed the detailed submission, and to reiterate the Urban Design Manager's comments, the proposed changes in 'massing terms' and 'the arrangement of footprints together with the heights' are to be 'limited' and the proposal does not create any 'significant additional impact' on the nearby heritage assets in comparison to the outline approval.

The detailed proposal does not create additional harm on the following designated heritage assets:

Grade I foundry. The proposal sits in a peripheral position in relation to this asset and...

Grade II laboratories. The proposal has created a gap between blocks D1 and D2 which is considered to be heritage benefit.

The proposed development will be visual from the setting of the Grade II\* former Board Room (Building 40), however, this impact is considered to be negligible due to the original approval (the impact of which remains unchanged).

The proposed architectural treatment is considered to be of high quality and reflective of the 'history' of the locality, they are well integrated within the established architecture of the Royal Arsenal and the Woolwich Conservation Area in the nearby designated heritage assets. It is agreed in heritage terms that the proposed changes to the approved scheme has a 'beneficial effect' to partially mitigate any undesirable visual harm created by the scale of the buildings on the surrounding heritage assets and the Royal Arsenal conservation area (and Woolwich Conservation Area).

The application/s are recommended for approval.

**Officer comments on consultation response:**

Noted.

<b>Consultee:</b>	Parks Estates and Open Spaces
<b>Date received:</b>	25/11/2024
<p>Summary:</p> <p>No objections raised. However, the following queries and comments are raised.</p> <ul style="list-style-type: none"> <li>• The play spaces appear adjacent to the swales that we assume will hold water during periods of heavy/prolonged wet weather. Are there any barriers/fences that help protect young children from accidentally falling in/entering the water?</li> <li>• The provision of outdoor sport seems limited - have the Council's Sports and Leisure Team been consulted?</li> <li>• It is assumed maintenance of the public green spaces and play areas will remain the responsibility of the managing agent of the developer in terms of management and maintenance.</li> </ul>	
<p><b>Officer comments on consultation response:</b></p> <p>Barriers are not shown around the swales on the submitted plans, but this level of detail can be secured through the existing conditions attached to the outline planning permission. The swales, or the area adjacent to the swales, seems to be double purposed as a play trail, however, officers have reviewed this and have confirmed that the play trails are surplus to the required quantum of play space.</p> <p>The Council's Sports and Leisure Team were consulted, and no comments have been received at the time of writing. In the Planning Board report for the outline planning permission (13/0117/O), in their comments, Sports England note that 'No sports facilities are currently proposed as part of the proposed development' and Sport England went on to request a financial contribution. This request was not accepted by the officer who noted:</p> <p><i>'Within the previous Section 106 Legal Agreement for the 2011 Warren / Royal Arsenal Masterplan, obligations and financial contributions were secured for open spaces, children's play space, sports and leisure facilities (on and off site). ITEM NO.: 5 PAGE NO.: 61 The current application is a revision of the Warren Site and will therefore be legally linked to the original Section 106 Agreement (Ref: 08/1121/O). The quantum of development is similar to that approved on the Warren site in 2011. Therefore, it is considered unreasonable to request further contributions towards sports provision.'</i></p>	

On this basis, Officers understanding if that the outline planning permission was granted on the basis that no sports facilities were to be provided within the development.

In regard to the maintenance, the long term maintenance of the space is covered within the existing s106 wording.

## 7.5 Local Residents and Businesses

7.5.1 A summary of the 112 consultation responses (comprising 110 objections, two comments of support, and one comment of partial support) received from local residents and business, along with the officer comments are set out in table below:

Support	
Supportive of reduction to national housing deficit.	Noted
Supportive of new linear park as a connection between the river, the arsenal and Woolwich proper. Supportive of approach to minimal street parking, very low provision of underground car parking spaces, and elimination of the premier inn car park. The level of density is good appropriate within context to support new housing.	Noted
Partial support Generally I support the proposal. It was planned a long time back and we knew the current park was temporary when we bought our property in 2018.	Noted
Objections	
Objections due to adverse amenity impacts to adjoining properties, including loss of light and overshadowing, loss of views, loss of privacy and overlooking, and noise impacts	These matters are assessed in section 19 of this report.
Objection to loss of existing greenspace including in regard to loss of children's play space, ecological impacts, loss of place which fosters social cohesions, impacts to wellbeing, reducing quality of life, and negative impacts on the Council's broader	These matters are assessed in section 10 of this report.

sustainability goals (exacerbates issues such as urban heat island effect, air pollution, and stormwater management)	
Objection to the replacement greenspace within proposed development in regard to the adequacy of the landscape design, its accessibility, and the play space provision	These matters are assessed in sections 13, 16, and 22 of this report.
Objection to ecological impacts including wind impacts and environmental degradation	Environmental compliance matters is discussed in section 18 of this report.
Objection due to misrepresentation in submission in terms of impacts on the environment, impacts to the community, and scale of the proposed greenspace	In terms of the accuracy of the submission documents, Council Officers have engaged third party experts to scrutinise the technical reports submitted as part of this application and the Council have been advised that, overall, standard methodologies have been used and the conclusions reached are reliable.
Objection to the public consultation completed by applicant	<p>The consultation requirements for town planning purposes have been met by Council Planning Officers as part of this application, and the associated reserved matters application, as described in the preceding sections of this report.</p> <p>Concern has been raised by objectors about consultation completed by the applicant in advance of the planning submission. Planning Officers cannot comment on any events which were run separate to this planning submission.</p>
Objection to the height increase	The proposed height increases are considered within the officers' report for ref: 24/0887/NM and officers have

	concluded that the proposed amendments are considered non-material within the context of the approved outline planning permission.
Objection to negative impact of design on character and heritage due overdevelopment	These matters are considered in sections 13 and 14 of this report.
Objection due to concern that proposal prioritises development over local needs, the need to ensure an appropriate balance is struck between enabling growth and minimising impacts, and support for reductions in scale of buildings and housing numbers	The application site forms part of 'The Waterfront Masterplan' which was granted outline planning permission on 19th June 2013 under reference 13/0117/O and later amended by planning application reference 16/3025/MA. Given the existing planning history, the consideration of an alternative site for the proposed development or a reduction in unit numbers and scale is not considered a material consideration in this instance.
Objection due to lack of services and facilities for existing and future residents, including insufficient public transportation, car parking, nurseries, health facilities, and other amenities	The number of approved homes within the application site is not proposed to change from what has been approved at the outline planning permission and revised outline planning permission stage. Consequently, in respect of the potential impacts on social infrastructure and amenities, the submitted Environmental Statement Addendum (ESA) concludes that impacts of the development remain consistent with what has already been approved on this site. These conclusions have been assessed by the Council's third party EIA consultant who

	have raised no objections to the submitted ESA.
Objection to construction impacts including construction traffic	Environmental compliance matters are assessed in section 18 of this report.
Objection to removing location for the air ambulance to land	Officers understand the air ambulance is a rapid response service capable of landing in a variety of settings. Given this was not secured through the outline planning permission or s106 legal agreement, this is not considered a material planning consideration in the assessment of the matters reserved by Condition 2 attached to ref: 16/3025/MA.
Objection to potential for community safety impacts to be exacerbated by increase in resident numbers and concern that safety is not adequately managed by site operators	<p>The application site forms part of 'The Waterfront Masterplan' which was granted outline planning permission on 19th June 2013 under reference 13/0117/O and later amended by planning application reference 16/3025/MA. The residential unit numbers have not increased in the submissions. Pedestrian safety is discussed in section 21 of this report and secured by design is discussed in section 25 of this report.</p> <p>Concerns related to the adequacy of the applicant's property management service are not considered a material planning consideration in this instance.</p>
Objection due to negative impacts on property prices	This is not a material planning consideration in this instance.

Objection due to transportation concerns including with cycling design, cycle parking provision, and parking design and removal of existing parking at Premier Inn	Transportation and safety are discussed in section 21 of this report.
Objection to unsafe pool	Fencing around the proposed swales would be secured by condition.
Objection to limited commercial space	The proposals would be consistent with the quantum of commercial space approved under the outline planning permission.
Objection due to too much emphasis being placed on car parking	The proposed development will result in a reduction in car parking compared to the outline planning permission. Transportation and the proposed approach to parking are discussed in section 21 of this report.
Objection due to lacking information in terms of climate change, carbon emission and energy efficiency, green infrastructure and biodiversity conservation, waste management and circular economy principles, transportation, and air quality	The proposed approach to sustainability, energy, and ecology is discussed in section 22 of this report. Transportation is discussed in section 21 of this report. Air quality is assessed in section 20 of this report.
Objection due to lack of clarity about how the proposed development aligns with the findings and conditions outlined in the Environmental Statement attached to the outline planning permission and its subsequent addendum	The submitted Environmental Statement Addendum (ESA), submitted as part of the non-material amendment, and the submitted Environmental Compliance Report, submitted under this reserved matters application, conclude overall that impacts of the development remain consistent with what has already been approved on this site under the outline planning permission and revised outline planning permission. These conclusions have been assessed

	by the Council's third party EIA consultant who have raised no objections to the submitted ESA.
Objection due to inadequate information regarding provision for accessibility	The application has been reviewed by the Council's Housing Occupational Therapist and is considered acceptable subject the discharge of the relevant conditions attached to the revised outline planning permission.
Objection due to loss of view from Forbes Apartment to Maribor Park and Woolwich Central	Potential impacts associated with the proposed height increase as are assessed within the associated s96a application, ref: 24/0887/NM. While outlook and protection of amenity are material considerations, views from private properties are not a material consideration.
Objection due to concern that the district heat network will not be upgraded and currently experiences failures when demand is high.	The applicant proposes to connect to a system of air source heat pumps as opposed to the existing district heat network. The approach to energy and sustainability is discussed in section 22 of this report.
Objection due to concern with loss of Catholic Club not being eco-friendly	The Catholic Club site is not considered within this development.
Objection as the proposed changes would not attract families or working professionals	The proposed housing mix is discussed in section 11 of this report and officers consider this is acceptable. The approach to play space is assessed in section 16 and officers consider this is acceptable.
Objection to the podium courtyards not being publicly accessible	The application site forms part of 'The Waterfront Masterplan' which was granted outline planning permission on 19th



	June 2013 under reference 13/0117/O and later amended by planning application reference 16/3025/MA. The approach to providing podium courtyards for the D Blocks is consistent with the outline planning permission.
Objection that there are no new gym facilities proposed	The proposal features potential for gym uses, which would be restricted to the commercial Buildings in D3 and D5, and this is assessed in the associated s96a application, ref: 24/0887/NM.
Objection on the basis that the concierge service and management company will struggle to accommodate increases in resident numbers	A delivery and service plan has been secured by condition to ensure the site and management approach are acceptable. The performance of the existing management company is not a material planning consideration in this instance.
Objection to empty retail units within the wider scheme	This is not a material planning consideration in this instance.
Objection to the lack of affordable housing	Affordable housing matters are considered in section 12 of this report.
Objection to building flats rather than houses	The proposed development is considered in accordance with style of development approved under the outline planning permission, which largely featured flatted development.
Objection on the basis that the height increase is only to make the development more financially viable	Financial viability is not a material consideration in the assessment of the reserved matters secured by Condition 2 attached to the revised outline planning permission.
Objection on the basis that a full planning permission should be required given the	Officers have reviewed the proposal and consider the development remained

time which has passed since the outline planning permission was approved	implementable at the time of submission.
Objection to removing the temporary park as it would decrease the value of nearby properties	This is not a material planning consideration in this instance.

## 8. **Planning Context**

8.1 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 – 2023) and Proposed reforms to the National Planning Policy Framework and other changes to the planning system (2024)
- Technical Housing Standards (2015)
- The London Plan (2021)
- The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy”) (2014)
- Full details of relevant SPD / Documents refer to appendix 3.

## 9. **Material Planning Considerations**

9.1 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 (Ref: 24/0848/R):

- Principal of development/compliance with the outline permission;
- Housing mix;
- Affordable housing;
- Quality of living environment provided for future residents;
- Design and Townscape;
- Heritage and conservation;
- Archaeology;
- Non-residential Uses;
- Environmental Compliance
- Residential Amenity;
- Noise and Air Quality;
- Transport and Access;
- Sustainability, Energy, and Ecology;
- Flood Risk;
- Crime and Firesafety;
- Equalities Duties;

- Community Infrastructure Levy (CIL);
- RBG CIL;
- Legal Agreement; and
- Implications for Disadvantaged Groups.

9.2 An EIA Screening Opinion (ref. 23/3844/EIA) concluded that the proposed does not require an Environmental Statement to accompany the reserved matters application as it is unlikely to give rise to significant environmental effects outside which have already been considered by the Environmental Assessment previously undertaken for the outline planning permission. The reserved matters application is supported by an Environmental Compliance Report prepared by Plowman Craven which covers several topics. This is discussed further in Section 18 of this report.

9.3 This reserved matters application has been submitted in accordance with the requirements set out by Condition 2 (Appearance, Landscaping, Layout and Design) of the Revised Outline Planning Permission (OPP), reference 16/3025/MA dated 17.03.2017, with relevant level of details provided.

## 10. **Principal of development/compliance with the outline permission**

10.1 The principle of redeveloping the application site for a mixed use development was established by the approved 2013 Warren Masterplan (Ref: 13/0117/O) which granted approval for the erection of 2,032 residential units and 2,442sqm on non-residential uses. This was maintained by approval reference 16/3025/MA dated 17th March 2017.

10.2 Condition 2 of permission 13/0117/O and 16/3025/MA states that:  
*“No building work shall be started until detailed plans / sections and elevations showing the following details in respect of relevant parts of the development have been submitted to, and approved by, the Local Planning Authority and the relevant part of the development shall in all respects be carried out in accordance with the approved plans:*  
 a) *External appearance of the buildings,*  
 b) *Design of the buildings,*  
 c) *Landscaping,*  
 d) *Siting of buildings.”*

10.3 A set out in section 3 and 6 above, this application is for residential units and non-residential floorspace within Plots D and K3, K4, K5, along with public / private landscaping details, car / cycle parking, refuse / recycling facilities and play provision. The development proposes to deliver 663 homes being

provided on site, 382 are private sale homes and 281 are other types of affordable housing product governed by the S106 legal agreement attached to the application site. The proposed residential homes are split across the Proposed Development, within seven buildings (Buildings D1, D2, D3, D4, D5, K3 K4 and K5), comprising a variety of size and mix of homes, with the intention of creating a mixed and balanced community. The Proposed Development includes a total of 959.1sqm of non-residential floorspace, split across 4no. units. Further the development proposes a 0.85 hectare park with play space for a range of age groups, 142 car parking spaces, and 1,262 cycle parking spaces.

- 10.4 The development of housing commensurate with the unit numbers and scale proposed on Plots D and K3, K4, K5, the establishment of a linear park between these blocks, and the establishment of a basement level car park are all in accordance with parameter plans established by the revised OPP. While the accompanying s.96A application seeks to amend some of the parameters of the original masterplan (and it is considered that those amendments are indeed non-material for the reasons set out in that report), it is necessary to consider the current proposal against the parameters already approved for this Warren Masterplan under the revised OPP and those in the non-material amendment application 24/0887/NM should it be approved prior to this application.
- 10.5 The linear park forms part of 'The Waterfront Masterplan' which was granted planning permission on 19<sup>th</sup> June 2013 under reference 13/0117/O and later amended by planning application reference 16/3025/MA, and is shown below in figure 3 along with the surrounding approved buildings within the Warren Masterplan. The groups of buildings are known as the A blocks, B blocks, blocks D and K and the park land. The A and B blocks have been constructed and are positioned to North of the application site. Blocks K3 and K5, along with block D are proposed to be built on the undeveloped areas currently occupied by the temporary open space known as Maribor Park. The new permanent park space will be formed between blocks D and K. This arrangement was approved as part of the 2013 masterplan, and revised OPP.



**Figure 3 Excerpt from outline planning permission**

- 10.6 The current application, as amended through the accompanying s96A applications, excludes block K2 and K1 and is therefore only for blocks K3-5 and D, as shown below in figure 4.



**Figure 4 Proposed landscape plan**

- 10.7 The current layout of Maribor Park which falls within the application site was granted temporary approval only under ref 14/1223/F and the design for the permanent park was granted reserved matters approval under 15/0596/R. The current plans for the permanent park will partially supersede the plans previously approved under submission 15/0596/R. As the current layout only benefits from temporary planning permission, and as the proposed landscaping plan and distribution of housing blocks and roading are in accordance with the approved OPP and revised OPP, no objection is raised in terms of the proposed landscaping plan and cessation of the temporary uses on the site.
- 10.8 Accordingly, the principle of the development is considered to primarily accord with the OPP and the revised OPP and therefore in principle no objection is raised.

## 11. Housing Mix

11.1 London Plan Policy H10 states schemes should consist of a range of unit sizes and should match the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment. Local Plan Policy H2 requires all developments to contain family sized units (i.e. 3+ bedrooms). Table 8 further clarifies the housing needs within borough and highlights there is a demand for 49% to be one- or two-bedroom units, and 51% to be 3-bedroom units. This does not mean all new development needs to comply with this mix as the existing housing stock already consists of a substantial proportion of family sized housing which caters for some of this demand. The policy states that exact mix on each site will vary according to the location of the development and the character of the surrounding area.

11.2 The overall number of homes across the masterplan is 2,032 homes (across Plots A, B, D, and K). The following condition was attached to the revised OPP:

*Condition 11 Residential Mix*

*Details in respect of residential accommodation shall include a mix of household types for both family and non-family households to be distributed throughout the development and shall include a significant element of accommodation capable of accommodating families and shall be submitted to, and approved by, the Local Planning Authority prior to the submission of any relevant reserved matters application. Such approved details shall be implemented in accordance with details approved pursuant to this condition.*

*Phases 6, 7, and 8 (Blocks B1, B2, and B3) of the development shall be carried out in accordance with the details approved by the Local Planning Authority on the 22nd of April 2015 under planning application reference 15/0675/SD, or as subsequently approved in writing by the Local Planning Authority.*

*Reason 11 To ensure there is a mix and size of dwellings to meet the future needs of households and ensure compliance with Policy H2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

11.3 The current application seeks the following housing mix:

Unit type / size	Total (%)
1-bed-1P	35 (5.3%)
2-bed-2P	253 (38.1%)
2-bed-3P	125 (18.9%)
2-bed-4P	180 (27.1%)

3-bed-5P	70 (10.6%)
<b>Total</b>	<b>663 (100%)</b>

- 11.4 A submission of details under Condition 11 was lodged in advance of the reserved matters application and registered with the Council under Ref 24/0459/SD. This details the housing mix within Blocks D1-D5 and K3-4, and K5 by tenure as shown below and is consistent with this reserved matter submission.

	1B1P	1B2P	2B2P WC	2B3P	2B3P WC	2B4P	2B4P WC	3B5P	Total
<b>Private</b>	17	137	2	36	18	137	1	34	382
<b>Discount Market Sale</b>	18	41	0	14	14	3	0	0	90
<b>Shared Ownership</b>	0	64	0	0	25	12	0	0	101
<b>Affordable Rent</b>	0	9	0	9	9	27	0	36	90
<b>Total</b>									<b>663</b>

## 12. **Affordable Housing**

- 12.1 As set out in the Planning Statement, the proposal has been designed to enable compliance with the S106 Agreement Affordable housing requirements and details will be provided via the discharge of the relevant S106 provisions.
- 12.2 Under the 2017 S106 Agreement connected to the extant outline planning permission, the requirements for affordable housing provision are for a total of 306 (46%) affordable homes to be delivered in this final phase of the Waterfront Masterplan, of which 115 (38%) are Affordable Rent (AR), 101 (33%) Shared Ownership (SO) and 90 (29%) Discount Market Sale (DMS) tenures. The developer states that this application has been designed to comply with the Affordable Housing requirements under the 2017 S106 agreement connected to this existing Outline Planning Permission and therefore there are a total of 306 affordable homes to be delivered within this final phase, which are broken down as follows 115 affordable rent (38%) 101 shared ownership (33%) and 90 Discount Market Sale (29%). However, the configuration of D&K means that there are 25 affordable units that cannot be secured on site. The intention is that these are delivered at another site controlled by Berkeley Homes, Kidbrooke Village, and resolution to grant planning permission subject to the completion of a s106 legal agreement has



been achieved for 25no 3-Bedroom properties within Block A1 of Phase 5 at Kidbrooke Village (ref: 23/3976/F).

- 21.3 Therefore, the applicant proposes to meet the remaining s106 Affordable Housing requirements for 306 affordable housing units by providing the following tenures within the application redline and as offsite provision:
- 281 affordable homes on-site, of which 90 are AR, 101 are SO and 90 are DMS, in a variety of sizes and located as follows:
    - o Building D1 – 69 Discount Market Sale (DMS)
    - o Building D2 – 3 DMS
    - o Building D5 – 101 Shared Ownership
    - o Building K3 K4 – 90 Affordable Rent
    - o Building K5 – 18 DMS
  - 25 affordable homes (3+ bedroom homes) at Kidbrooke Village
- 12.4 The Council's Housing New Supply Department has advised that this tenure mix would be acceptable as it relates to the existing s106 agreement.
- 12.5 The tenure mix within the Warren Master plan is controlled by a mechanism in the s106 which specifies a required amount to be paid to the developer for the affordable homes. The amount was set in 2011 and is inflated based on BCIS build cost indexation from 2011 until one year after planning is achieved.
- 12.6 The S106 agreement states that should the developer not receive offers for the affordable rented housing at the required amount, a review mechanism can be applied to the affordable housing. This mechanism allows for the rented stock to be varied to Discount Market Sale or Shared Ownership homes, which can achieve a higher per unit value, to fill the funding deficit for the affordable rented homes.
- 12.7 Due to the existing s106 wording, if a registered provider cannot be found to purchase the units at the dictated rate, the Local Planning Authority would not have powers to stop the cascade to DMS from happening. To ensure the tenures set out above are achieved on site, a separate agreement is being reached between the applicant and the Council's Housing New Supply Department to acquire Blocks K3-K4 to ensure these 90 units are utilised as Affordable Rent tenure, which is the Council's preferred tenure, and to avoid the cascade mechanism in the s106 from being implemented. The acquisition of these units and the process to secure their utilisation as Affordable Rent would be secured through a Developers Agreement between the applicant and the Borough and a Deed of Variation to the Warren Masterplan s106 agreement.

- 12.8 In terms of the offsite provision of 25 affordable homes, the existing s106 agreement restricts the full occupation of the private tenure units until the affordable housing obligations have been fulfilled. The Local Planning Authority have been advised that these existing restrictions provide certainty that the 25 affordable homes (3+ bedroom homes), or units with an equivalent number of habitable rooms, would need to be delivered by the applicant to satisfy the s106 affordable housing obligation before full occupation of the private units could be achieved. On this basis, Officers are satisfied that there is certainty that these homes will be delivered in accordance with the s106 requirements.
- 12.9 While the s106 allows for changes to tenure through the cascade mechanism described above, should this reserved matters application be approved, an amendment would be required to facilitate changes to the proposed tenure outlined above. Accordingly, Officers consider that the tenure proposed by the applicant is acceptable and understand that an agreement would be reached to ensure its delivery as proposed. On this basis, Officers consider the application is acceptable in regard to the proposed affordable housing offer.

### 13. **Design and Townscape**

- 13.1 NPPF chapter 12 states good design is a key aspect of sustainable development. New developments should function well, be visually attractive as a result of good architecture, layout and appropriate and effective landscaping. They should be sympathetic to local character and history and establish or maintain a strong sense of place using the arrangement of streets, spaces, building types and materials. Development that is not well designed should be refused.
- 13.2 London Plan Policy D3, D5 and D8 state new development should enhance local context by their layout, orientation, scale, appearance and shape, provide legible entrances to buildings, clearly defined public and private environments, achieve safe and inclusive environments, provide active frontages, contribute towards the local character and be of high quality.
- 13.3 These policies are supported by Core Strategy Policy DH1, which states all developments are required to be of a high quality of design and to demonstrate that they positively contribute to the improvement of both the built and natural environments.

### Layout

- 13.4 The key features of the designed layout as secured by the parameter plans are:
- A linear park between the D Block and Blocks K5-3
  - Block D comprising a perimeter block with raised podium gardens above basement car parking
  - Block K5-3 forming a linear composition which fronts Beresford Street to the south and the linear park to the north
  - Blocks K5 and D3 forming the key gateway buildings to the scheme and sitting at heights above the other D and K block buildings
- 13.5 The scheme has been designed to align with the revised layout and parameters submitted as part of the pending S96A application 24/0887/NM. The proposed removal of Block K1 from the masterplan has freed up space to south of the linear park, which the applicant consider improves the public realm and existing building to the north and east.
- 13.6 The Urban Design Officers comments on layout and form are copied below.

Urban Design Comment
<p><b>Layout</b></p> <p>The proposed landscaping of the linear park is underpinned by an interesting concept linked to the geological character and history of the site. It models the topography of the site in a way to create a diverse range of habitats and landscape typologies.</p> <p>The more formal design and shallow character of vegetation on the raised podiums is suitable for these spaces positioned above the enclosed carparking.</p> <p>The interface of the park with New Warren Lane should be further detailed at the next stage.</p> <p>The loading bays and accessible carparking on Duke Wellington Avenue and New Warren Lane would have some negative impact on the spatial and environmental quality of these routes. Nevertheless, they have been acceptably integrated with interposed trees and shrub planting. The designed hedge planting assist in defining adequate defensible space in front of the maisonette units on New Warren Lane.</p> <p>A more natural material than resin bound gravel could have been explored for part of the designed play area, more coherently with the organic and</p>

naturalistic character of the park and foster more informal, intergenerational play.

The proposed arrangement of buildings on the site is not objected to as in keeping with the approved masterplan.

In keeping with the pre-application stage, the removal of the low-rise links is not objected to in principle. However, the original concept presented at the first pre-app meetings of green steps with vegetation visually climbing onto the designed communal open-spaces hasn't been translated very effectively in the submitted proposals. Due to the necessity of providing natural ventilation to the enclosed garage, the steps have been replaced with a street-level low-wall and planter, with its vegetation partially concealing the garage passive wall and ventilation grids. The southern frontage of Blocks Ds is partially activated by the corner commercial units and central lobby to Block D2. Generally, the revised layout in this area presents some weaknesses which needs to be considered holistically with all identified issues and benefits.

The street frontage of Blocks Ds on Duke of Wellington Avenue and new Warren Lane is negatively affected by the designed enclosed carparking, bin stores and bike stores. Nevertheless, the proposed commercial units, residential units and communal entrances on these sides have been distributed in a way to provide sufficient activation on the most prominent points of the site.

The ground floor residential units facing New Warren Street should be carefully scrutinised in terms of their available sunlight/daylight.

The ground floor of Blocks Ks on Beresford street and the park are negatively affected by the concentration of bin stores, plant rooms and bike stores. In these terms, the side-to-side communal lobbies are beneficial to partially mitigate this issue and provide some visual connection between Beresford Street and the park. The designed corner commercial-units have been thoughtfully positioned to activate the most prominent points of the overall building approaching from Woolwich Church Street and eastern Beresford Street.

The chamfered corners of the building are beneficial to invite pedestrian into the masterplan and avoid any excessive bottleneck on the sidewalk, particularly at the junction of Beresford Street and New Warren Lane.

The internal lane providing vehicular access and blue-badge carparking to the north of Blocks Ks has some negative impact on the intended pedestrian and naturalistic character of the linear park. A condition should be included to ensure that this lane is effectively detailed as an integral element of the landscape strategy.

Regarding the upper floors of Blocks Ds, the introduced gap between D1 and D5 is beneficial to slightly increase the percentage of dual aspect units on these blocks in comparison to the outlined layout in the approved masterplan.

The chamfered corners between the adjoining blocks D2 and D4 are beneficial to create enhanced single aspect units with more appealing outward views. The number of single aspect and enhanced single aspect units on the type floors of the buildings exceed 50% of all units on blocks Ds, which is far from ideal in design terms and not in line with the recommendations from the London Plan and GLA Housing Design Standards. However, it is understood that these weaknesses originate from the approved masterplan. It is noted that no single aspect-north facing unit is proposed in blocks Ds. Only Block D1 exceeds the maximum of eight units per floor recommended by the LPG, incorporating ten units per type floor.

Regarding the upper floors of Block Ks, some concern is raised on the long internalised corridors serving the residential units in blocks K3 and K4. This arrangement results into a high percentage of single aspect units, including north-east facing units in the overall type floors of blocks Ks, exceeding 50% of the total. Again, it is understood that this is in line with the approved masterplan.

The proposed mix of projecting and recessed balconies on the park side are beneficial to maximise the advantages from the proximity to the park and assist in the design of the form of the buildings.

The designed projecting balconies on the busy Beresford Street are less convincing, specifically on the lower floors. Recessed loggias would have been a more appropriate response on the lower floors of the building. It is noted that the projecting balconies on Beresford Street are not in keeping with the Masterplan layout, which incorporates recessed balconies on Beresford Street and projecting balconies on the park side. The projection of the balconies over the public realm is also reason for concern. An

agreement on this issue should be found with the Council prior to submission.

In conclusion, the outstanding issue regarding the proposed layout is the interface of Blocks K3 and K4 with Beresford Street. No objection is raised regarding the acceptability in design terms of the rest of the designed layout.

- 13.7 The Urban Design Officers concerns with the loading bays on New Warren Lane have also been highlighted by the Council's Highways Officer, and this aspect of the design would be subject to refinement through safety audit and final design agreed with the Council.
- 13.8 The quality of the accommodation, including the sunlight and daylight performance of units, is considered in section 16 below.
- 13.9 A condition of consent is recommended to ensure that the layout of the shared surface to the north of Block K is acceptable prior to implementation. Similarly, a redesign of the landscaping to the north of Block K would be secured in the heads of terms, to ensure that this area is sufficiently integrated into the park.
- 13.10 Overall, the proposed layout is considered in accordance with the parameter plans approved through the revised OPP and, subject to the recommended conditions of consent and informatives, the proposed design is considered acceptable.

#### Massing and Form

- 13.11 The scheme has been designed to align with the revised layout and parameters submitted as part of the pending S96A application 24/0887/NM. This has resulted in the addition of a further floor to all building within the scheme and some modification to form of some buildings. The D Blocks have been slimmed down with greater separation distances provided between these buildings and an additional separation added between Blocks D1 and D5. Further, the minimum height of the podium park has been removed in order to soften that the transition between the permitter block and the park. The set back on the upper floors Block K3-K4 have been removed which bring the full extent of these buildings to 10 floors, maximising utilisable floor space.

13.12 The Urban Design Officers comments on layout and form are copied below.

Urban Design Comments on Massing and Form

All proposed blocks have been increased in height by three metres (exception made for Block K5, which is increased by 3.5m) in comparison to the approved masterplan, equivalent to a single residential storey.

The proposed heights are generally suitable for the surrounding context. The increased height of Blocks D1 and D2 would create a slightly starker difference in height with the neighbouring Grade II\* Royal Arsenal Verbruggens House (The Board List Entry Number 1078957) and the Grade II\* Royal Laboratory West Pavilion (List Entry Number 1245208). However, it would sit peripherally on the main views of the listed building approaching from No 1 Street. Moreover, it is noted that the existing Riverside Towers sits in the background of the listed building on these views and have already established the principle of coexistence of buildings of different scales and periods in this part of the Royal Arsenal.

The proposed Blocks D1 and D2 are overall coherent with this emerging character.

The increased height of Blocks D1 and D2 would create a slightly starker difference in height with the neighbouring, three storey high, Grade II\* The Board building. However it would sit peripherally on the main views of the listed building approaching from No 1 Street. Moreover, it is noted that the existing Riverside Towers sits in the background of the listed building on these views and have already established the principle of coexistence of buildings of different scales and periods in this part of the Royal Arsenal. The proposed Blocks D1 and D2 are overall coherent with this emerging character.

The increased height of Blocks K3 and K4 has some negative impact on how their bulk is perceived approaching from Beresford Street. The two blocks create a rather monolithic feel on this side, which is only in minor part mitigated by the designed subdivision of this overall form into smaller elements, using the setback of the designed staircases. The language of recessed balconies is more successful on the park side in these terms. The designed projecting balconies on both sides are beneficial to a certain extent to further mitigate the monolithic feel of the overall building.

No particular issue is raised on the massing and form of the taller element K5, which would provide a legible marker of the entrance to the masterplan together with the neighbouring Block A.

Overall, the main outstanding issue is in regard to the bulk and monolithic feel created by Blocks K3 and K4 on Beresford Street. It is understood that this should be considered holistically with all other identified issues and benefits provided by the scheme.

- 13.13 An Environmental Statement was submitted alongside the OPP (13/017/O) (2013 ES) and an Environmental Statement Addendum (2016 ESA) was submitted alongside the Revised Outline Planning Permission (16/3025/MA). This non-material amendment application is supported by a further Environmental Statement Addendum (further ESA) and this approach was agreed through a screening decision issued by the Council on 5 January 2024 (23/3844/EIA).
- 13.14 As set out in the non-technical summary, the further ESA concludes that significant effects, mitigation proposals, and residual effects associated with the proposed amendments remain unchanged when compared to the 2013 ES and 2016 ESA in terms of: landscape and visual impacts; heritage impacts; air quality; noise and vibration; soil and groundwater; daylight, sunlight and overshadowing impacts; wind and microclimate impacts; and cumulative impacts.
- 13.15 The submission documents including the further ESA have been reviewed by the Council's independent third party environmental impacts assessment specialist, RPS consulting. While RPS raised some initial points of clarification which were resolved by the applicant, RPS have concluded that they concur with the applicant that the conclusions reached in the previous environmental impact documents remain unchanged.
- 13.16 Overall, the Urban Design Officer has concluded that the massing is largely acceptable and consistent with the general scale of the massing approved under the outline planning permissions, with the exception of the increased massing to Blocks K3 and K4 which they consider increases the bulk of the building as visible on Beresford Street. Further, they have cited that the amended Block D footprint exacerbates the sense of pinch point with Block B of the riverside towers. Furthermore, the associated reserved matter application (24/0848/R) has been reviewed by the Council's Conservation Officer who has raised no objections to the scheme.
- 13.17 The outline planning permission was submitted in the context of the need to revisit the 2008 outline planning permission to make revisions to ensure that compliance with revised minimum room requirements in the development



plan could be achieved. Similarly, the current proposal is being driven by a need to meet the emerging fire safety guidelines and to ensure compliance can be achieved with London Plan (2021) Policies D5 and D12, which support that, in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety, including the provision of suitably sized fire evacuation lift suitable are provided to evacuate people who require level access from the building.

- 13.18 Officers note that Blocks K3-K4 are proposed as 100% affordable rented units. Secondly, officers note that Blocks K3 and K4 were approved with a maximum height of 9m (c40m AOD), although the approved parameter plan show this height stepped down to c34m AOD for an instep of approximately 2m where the building joins Beresford Street and by approximately 3m towards the southern extent of the building where the building joins New Warren Lane (as shown on approved plan 10 - 116\_P3011\_Rev 01\_Maximum Heights). Despite these setbacks being shown on the approved plans, this setback is not relied on in the officers assessment of the scheme in the Planning Board report for the Outline Planning Permission which references the height of Blocks K3 and K4 as 9m. On this basis, while the approved plans featured this setback, officers due not consider that this setback was relied on as a significant or mitigating design feature when the Outline Planning Permission was considered, and this aspect of the design was not reconsidered under the Revised Outline Planning Permission. Accordingly, subject to a consider of sunlight and daylight and environmental factors, officers do not consider the omission of this setback is a material change in this instance as it is not clear that absence of this setback would have changed the officer's recommendation when the outline planning permission was approved.
- 13.19 In terms of the proposed single storey height increase to Block K3 and K4, Officers consider that the proposed height is minimal in the wider context of meeting the emerging fire safety guidance and supporting the delivery of the approved quantum of affordable housing. Further, Officers note that the primary amendments are proposed at the upper extent of the building with the building footprint remaining largely as approved with a more slimline design, which ensures that the building as experienced at the human scale will be largely unchanged from the consented position.
- 13.20 In term of the Urban Desing Officer comments on D3, Officers note that, while the building footprint is slightly amended, the overall bulk of the footprint of D3 would be significantly reduced from maximum footprint permitted under the outline planning permission. Accordingly, the overall

reducing of the footprint of Block D3, as well as the other block on Plot D, would adequately diminish the sense of proximity noted by the Urban Design Officer. Overall, while the heights would be increasing, the buildings remain in keeping with the general scale which was approved under the outline planning permission and building are refined through the addition of chamfered corners and increased separation distances between the D Blocks, including the addition of a new separation between blocks D1 and D5. Therefore, these changes are considered non-material as they are generally consistent with the level of development which was approved under the outline planning permission.

- 13.21 Officer concur with the Urban Design Officers overall finding that changes to that massing are acceptable despite the proposed height increases, and Officers are satisfied that the massing changes to Blocks K3, K4, and D3 are acceptable as discussed above.

### Architecture

- 13.22 The Urban Design Officers comments on architecture are copied below.

#### 3. Architecture

Blocks D3, D4 and D5 are designed as a legible family of buildings approaching from the linear park. Their brown/red multistock brick facades incorporate expressive detailing subtly referring to the history of rope making in the Royal Arsenal. These include the windows surrounds of Blocks D4 and D5, which incorporate a chamfered brick finish and double soldier course detailing, reproducing the feel of a rope by alternating two brick finish tones. The grouping of windows is thoughtfully balanced to legibly expressed the main parts of the buildings, including their base, middle and top.

Soldier black brickwork is selectively used to mark the lintels of doors and windows.

This overall language is slightly simplified on the taller block D3, which is marked by the white brick surrounds and interfloor fasciae, grouping adjoining floors and defining the rhythm on façade.

The metalworks of the buildings, including all windows, doors and balconies are expressed with a dark olive colour that would complement successfully the proposed brickwork. The designed balconies with frontal metal railings and solid side panels contribute to merging the three buildings with the warehouse styled blocks D1 and D2.

The recessed communal entrances to the buildings are marked by the chamfered brick elevation and soffit and generous doors with side windows. The warehouse styled architecture of Blocks D1 and D2 works well with the established character to the north of the site, defined by the neighbouring redd-brick mansion blocks, the historic Grade II\* The Board building and the warehouses of the Grade II Building 4I and 4IA Royal Laboratory Square buildings, now hosting Woolwich Works, with their full width Crittall windows.

The black finish of doors, windows and balconies are coherent with the warehouse style of the buildings. The white sill detail creates an appealing contrast with the dark colour of the windows.

The recessed entrances are marked by generous glazing incorporating the entrance door. Their chamfered elevations and soffits creates a legible relationship with the neighbouring blocks D3-D5.

The architecture of blocks K3, K4 and K5 is coherent with that of blocks Ds.

The superficial treatment of Block K5 is in keeping with Block D3, which creates a legible coherent character entering the masterplan from Beresford Street. Blocks D3 and D4 are expressed by an expressively textured dark-red brick, complemented by soldier courses and interfloor pre-cast fasciae. The door and windows of ground floor and bike stores are finished with the same colour to effectively merge with the façade.

The recessed communal entrances are effectively marked with corbelled brick elevation.

Balconies are thoughtfully designed with partial solid balustrades, which improve their sense of privacy and separation from the busy street and creates a legible relationship and expression line with the height of the window sills. The olive colour of windows, doors and balconies works well with the brickwork and help to create a coherent character across the overall group of buildings.

While further improvement is recommended on Blocks Ks, the overall architecture of the scheme is considered acceptable in design terms.

#### 4. Conclusion

Full agreement should be found with the Council regarding Blocks Ks prior to submission. Leaving aside this issue, the rest of the scheme is considered acceptable in design terms.

A comprehensive condition should be included for all proposed materials and features on facade. Material samples should be provided for all visible materials and features on facade and in the public realm. Mock-up panels should be prepared for all type bay-walls. Detailed technical section drawings (scaled 1:5, 1:10 and 1:20) should be provided for all type walls and key interfaces between different components and materials.

13.23 Overall, the Urban Design Officer has concluded that the architecture is largely acceptable subject to a full review of materials at the submission of details stage. While the Urban Design Officer has raised some issues with K Block, this primarily relates to concern about creating a monolithic presence on Beresford Street. However, as discussed above, this concern is primarily related to the massing which Officers consider is acceptable and no amendments to materials or architectural detailing have been sought in relation to this comment. However, in terms of the relationships with the groups of buildings, the Urban Design Officer has confirmed that the architecture of blocks K3, K4 and K5 is coherent with that of blocks Ds. Accordingly, Officers concur with the overall feedback of the Urban Design Officer that the architecture is acceptable, and despite the concerns raised with the K Blocks no objection is raised to these buildings. A condition of consent has been recommended to support the Urban Design Officers comments on materials.

#### 14. **Heritage and conservation**

14.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislation which protects the historic environment. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty upon local planning authorities to consider the impact of proposals on listed buildings.

14.2 Chapter 16 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent. Where a development proposal will lead to

less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

- 14.3 London Plan Policy HCI and Core Strategy Policy DH3 state new development should preserve or enhance the character and setting of heritage assets, including listed buildings, locally listed buildings and conservation areas.
- 14.4 The buildings' location, scale form, mass and design accords with the design principles established within the approved applications.
- 14.5 The site does not contain any designated heritage assets and has no built heritage of significance, however the northern extent of the site falls within the Royal Arsenal Conservation Area and the site is in the near vicinity of numerous heritage assets.
- 14.6 Since the revised OPP was granted in 2017, Woolwich Conservation Area was designated in 2019 and the former Carriage Completion Workshops (9-11 Gunnery Terrace, Cornwallis Road) were added to the Council's Local List in 2021. The submitted Heritage Statement concludes a negligible impact on the Woolwich Conservation Area. It concludes no harm to Gunnery Terrace due to its distance from the site and the site not falling within its setting.
- 14.7 The application contains an Environmental Compliance Report (ECR), which builds upon the original Environmental Statement that was submitted with the Outline Planning Permission and the Environmental Statement Addendum that was submitted with the revised Outline Planning Permission. The ECR contains chapters on the Townscape and Visual Impact Assessment (TVIA) and archaeological and Built Heritage effects. The ECR concludes that the reserved matters application would have no change upon national or local heritage assets in comparison to the original approval or indeed views towards the site from various vantage points in the locality. This information has been received by the Council's Conservation Officer as well as the Council's environmental impact assessment consultant who have raised no objection to the conclusions reached in the ECR of the methodologies used to reach them. This position is considered understandable considering the outline planning permission established the presence of modern buildings of increased density in this setting, and despite the amendments put forward under the associated s96A application, this relationship remains as consented. Consequently, Officers do not consider that the proposed development will

cause any greater harm to heritage assets of the local/wider townscape than has already been assessed previously.

## 15. **Archaeology**

- 15.1 Following consultation with GLAAS, the revised OPP 16/3025/MA was approved with relevant archaeological conditions attached: condition 37, which requires that the applicant secure the implementation of a programme of archaeological work in accordance with a written scheme for investigation; and 38, which requires that no demolition or development shall take place on the relevant part of the site until the developer has secured the implementation of a programme of archaeological recording on.
- 15.2 GLAAS have been consulted on the proposed development and, subject to assurance provided by the applicant through the course of processing the application, are satisfied that the development will be acceptable in terms of archaeological impacts subject to the submission of full materials under the approved conditions.
- 15.3 Accordingly, the reserved matters for this application are considered acceptable in regard to archaeology.

## 16. **Quality of Living Environment provided for future residents**

- 16.1 The current application seeks permission for seven proposed buildings comprising 663 residential units (D1 – 83 units, D2 – 48 units, D3 – 136 units, D4 – 120 units, D5 – 101 and K3-K4 – 90 and K5 – 85).

### Cores

- 16.2 Standard B2.5 of the Housing Design Standards London Planning Guidance (LPG) relate to access to units, including incorporation of access control measures, core layouts and lift provision and that each core should be accessible to generally no more than 8 units per core.
- 16.3 Buildings D2-D5 and K5 would have a maximum dwellings per floor plate (D2 (6 units per core), D3 (8 units per core), D4 (8 units per core), D5(8 units per core), and K5(4 units per core)). Buildings D1 and K3-4 both feature 10 units per floor plate. Whilst D1 and K3-4 technically exceeds the flats to core ratio specified within the LPG, the majority of blocks comply with this requirement of eight flats per core. Due to the fire safety requirements, and considering the constraints of the outline parameter plans, the applicant

advised it was not feasible to subdivide these blocks as providing the required stair core and lifts for each block would be highly inefficient and would likely lead to an increase in service charges. Furthermore, the applicant has advised across the scheme the average is 8 units per core. The HSE (Planning Gateway 1) has been consulted and has not objected to the proposed layout of the buildings. Given these factors, officers raise no objection to this arrangement in this instance.

#### Internal Space Standards

- 16.4 London Plan Policy D6 and Table 3.1 require new housing to meet specific internal space sizes, including the provision of built-in storage. Policy D6 also states that a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged.
- 16.5 All of the residential units within the detailed elements either meet or exceed the requirements of London Plan Policy D6 and Table 3.1 and incorporate the appropriate built-in storage. The floor to ceiling heights would be at least 2.5m across all rooms within the Plot in accordance with these requirements.

#### Aspect, Outlook and Privacy

- 16.6 London Plan Policy D6 as well as Standard 29 of the Housing SPG state that developments should minimise the number of single aspect dwellings, particularly if they are north facing. This is supported by Core Strategy Policy H5. London Plan Policy D6 also requires new housing to provide sufficient outlook and privacy.
- 16.7 In terms of aspect, the proposal would provide an acceptable standard of accommodation. Of the proposed 663 units, it is proposed that 100% of three bedroom units would be dual aspect, with 44% dual aspect home (or 49% including semi dual or 'enhanced' aspect homes) with instances of single aspect units limited to 1-Bedroom and some 2-Bedroom properties. Enhanced aspect units are still regarded as single aspect ones but also have windows on the side of projecting bays which themselves are less than 50% the depth of the room the windows would serve. These provide a better outlook and living conditions than a straightforward single aspect dwelling. Further, the applicant has advised that the design revision, included the added cut through between Block D1 and D5, have enhanced the percentage of dual aspect and semi dual aspect homes by approximately 7%. Considering the block pattern and block sizes are largely dictated by the outline planning permission,

Officers consider that the achieved percentage of dual aspect home is acceptable.

- 16.8 In general, the units would be provided with acceptable levels of outlook. While the D Blocks would be engaged with each other, and also have outlooks onto New Warren Lane and the housing opposite, this layout and the outlooks provided are dictated by the outline planning permission. The majority of units will have outlook onto amenity planting within the park or podium courtyard which is considered a positive feature of the scheme. The southern façade of the K Block, which includes single aspect and enhanced aspect units, would feature a primary outlook onto Beresford Street, and this is considered acceptable on the basis that this layout is dictated by the outline planning permission. Separation distances of 18-20 meters would be provided for the majority of buildings within the site. Separation distances to the north of the scheme with the B Blocks (Judd House and Deveraux House) would be less than this, but this arrangement is in accordance with the outline parameter plans. Privacy screen for balconies will be utilised on balconies fronting Beresford Street, Duke of Wellington Avenue, and New Warren Lane and balconies have been positioned to maximise privacy. A condition of consent is recommended to secure final materials, including balcony privacy screens. Overall it is considered that the acceptable levels of privacy have been achieved and that the scheme is consistent with the pattern of development approved under the outline planning permission.

#### Daylight and Sunlight

- 16.9 London Plan Policy D4 states new development should provide sufficient daylight and sunlight to new housing and is appropriate for its context.
- 16.10 In relation to the detailed parts of the proposal, the submission includes an assessment of the internal daylight and sunlight levels within all of the proposed units, and of the overshadowing of external amenity areas. The daylight and sunlight calculations have been correctly undertaken in accordance with the BRE document 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice, Third Edition 2022'.
- 16.11 The BRE guide recommends that interior daylighting is checked using the daylight provision test set out in BS EN 17037. The test measures both the amount of daylight, as well as the distribution of daylight within a room. The test is applied to habitable rooms within domestic properties.



- 16.12 The BRE guidance states that, in general, for a dwelling to be reasonably sunlit it should provide at least one main window facing within 90° of due south, and a habitable room, preferably a main living room, receiving a total of at least 1.5 hours of sunlight on 21 March.
- 16.13 With regards to the acceptability of the proposed residential homes, an Internal Daylight, Sunlight and Overshadowing (DSO) Assessment, prepared by GIA, supports the application submission and assesses the proposed residential homes in terms of daylight and sunlight. In relation to daylight, the overall performance of the Proposed Development is good and 68% of the tested rooms meet or exceed the recommended targets. For sunlight, 61% of all proposed residential homes will have at least a south-facing window and all of these will achieve at least 1.5 hours of sunlight on the 21st March. Sunlight levels are reduced in north aspect homes and in some located at the lower levels where they face another building. Whilst a number of rooms do not meet the recommendations, the results are not unusual in the context of an urban location and a level of non-compliance can be attributed to the consideration that the BRE guide standards are derived from a low density, suburban housing model, and are primarily meant for assessing new two storey housing. In contrast, this scheme is a 663 unit development with multistorey buildings in an arrangement largely dictated by the outline planning permission, and also featuring balconies as required to achieve compliance with the London Plan private amenity requirements. In this context, a level of non-compliance is anticipated. The BRE notes that the recommended guidelines are to be interpreted flexibly and daylight issues have to be balanced against the other planning merits of a development.
- 16.14 Taking all of the above into consideration, officers are of the opinion that on balance the amount of daylight and sunlight being provided to the units Blocks D and K is acceptable noting the site constraints and relevant points made above.

#### Noise

- 16.15 Core Strategy Policy H5 requires the incorporation of appropriate protection including through layout and design. Policies DH1 and E(a) also seek to protect new and existing residential uses from adverse noise impacts as a result of development.
- 16.16 The matter of noise insulation for residential units within the development would remain covered by conditions 41 to the revised OPP which specifically requires a detailed noise mitigation scheme be submitted to the Council for approval which shall identify noise exposed habitable rooms including

dwellings fronting Beresford Street/Plumstead Road as shown on plan 434\_05\_M\_07\_120 (Rev. P1) and outdoor amenity space (including balconies or shared outdoor amenity space. Officers note that a submission has been received in respect of this condition, under Ref: 24/046/SD, which corresponds with the details of this reserved matters submission. There are some noise level exceedances recorded on the balconies fronting Beresford Street, however the submission advises these exceedances would be mitigated by the presence of nearby, quieter amenity space. The Council's Environmental Protection Department have raised no objection to the proposed development in terms of noise levels for future occupiers within dwellings or the proposed approach to private amenity spaces, under either Ref: 24/0460/SD or Ref: 24/0848/R, and officers consider the approved conditions on the revised OPP would ensure acceptable noise levels are attained in all future units and appropriate levels noise levels are attained in either private or public amenity spaces.

- 16.17 In addition to the above, Condition 33 (Code of Construction Charter), Condition 39 (Noise and Ventilation), Condition 40 (plant noise), Condition 48 (Crossrail) attached to the revised OPP 16/3025/MA and the further Condition 78 (noise and vibration from gyms) proposed under the associated s96A application, 24/0887/NM, ensure further safeguards are in place to protect future occupiers from inappropriate levels of noise and vibration.
- 16.18 Accordingly, in light of the advice received from the Council's Environmental Protection Department, officers consider the combined conditions above would ensure that future occupiers of the development would be provided with adequate noise insulation and protection from vibration impacts, in accordance with Core Strategy Policy H5.

#### Private Outdoor Amenity

- 16.19 London Plan Policy D6 requires a minimum of 5sqm of private outdoor space be provided for 1-2 person dwellings with an extra 1sqm should be provided for each additional occupant. Terraces/balconies must also achieve a minimum depth and width of 1.5m.
- 16.20 In general, all of the proposed private amenity spaces within the proposed Development meet or exceed the minimum requirements, with the exception of the 3B5P chamfer balconies on Plot D, which measure 7.2sqm and fall slightly below the requirement of 8sqm. This minor shortfall is related to ensuring a consistent design and appearance across the façade is achieved. While this minor shortfall is noted, officers consider this is acceptable in this

instance considering residents in Block D would have access, in the immediate vicinity of their homes, the podium and ground level gardens for their use. Overall, the proposed approach to private amenity space is considered acceptable.

### Play Space

- 16.21 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 which also expects all new residential developments to incorporate good quality, accessible play provision for all ages of a minimum of 10sqm per child.
- 16.22 This is consistent with London Plan Policy S4 which identifies the play space requirements for 0–4-year-olds (described as doorstep play), 5–11-year-olds, 12–15-year-olds and 16-17 year-olds.
- 16.23 Using the figures provided and the GLA Population Yield Calculator, the development overall would need to provide 1,884sqm of play provision site wide, and is broken down as follows (and shown in figure below):
- 853sm<sup>2</sup> for 0-4yrs old,
  - 633m<sup>2</sup> for 5-11yrs old,
  - 261m<sup>2</sup> for 12-15yrs old and 1
  - 38m<sup>2</sup> for 16-17yrs old.

An additional 175m<sup>2</sup> of playspace is also provided, as part of the requirements from previous development phases at Plots A and B.



**Figure 5 Play distribution diagram**

- 16.24 The planning submission explains that the play space is integrated throughout the park to provide a variety of experiences, including a number of flat areas and mounds, making the most of the park's topography. The described concept is to create an accessible playable landscape, encouraging interaction and engagement with the natural world. As shown in figure 5, the majority of the playspace would fall within the publicly accessible section public realm and provision for Block D provided on the podium courtyard, with some Block D provision within the public realm. The application redline for Ref: 24/0848/R falls partially over the redline for of the submission approved under ref 15/0596/R. Where this overlap occurs, the proposals for ref: 24/0848/R would supersede ref 15/0596/R. The areas of ref 15/0596/R outside of the current application boundary would retain reserved matters approval.
- 16.25 Play space provision is therefore considered to be compliant with London Plan Policy S4 and Policy H(e) of the Core Strategy. Precise details of play space are required by condition 68 of the planning permission for the whole of the development (16/3025/MA).

## Accessibility

- 16.26 London Plan Policy D7 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'.
- 16.27 Wheelchair user dwellings include those designed to be wheelchair accessible M4(3)(2)(b) and in which a wheelchair user can live permanently, comfortably and conveniently with access and use of all facilities within the home, or easily adaptable M4(3)(2)(a), which is one that is not immediately occupied by a wheelchair user but with all spatial provisions in place. This requirement is mirrored in policy H5 of the Core Strategy.
- 16.28 The Proposed Development delivers a total of 71 M4(3) compliant Adapted or Accessible Homes, exceeding the 10% planning policy requirement. Of these 71 homes, 9 will be wheelchair adaptable (M4(3)a) and 62 will be wheelchair adapted (M4(3)b). The rest of the homes within The Ropeyards development have been designed to comply with Building Regulation M4(2) for accessible and adaptable homes.
- 16.29 The Council's Occupational Therapist has reviewed the proposed development in terms of the acceptability of the design of the proposed units and means of access and approach within the scheme. Subject to assurance and further information provided by the applicant and design revisions to the basement parking layout, the Occupational Therapist is satisfied that the development can achieve the necessary compliance through the submission of further details.
- 16.30 The standard of accommodation is to be strictly enforced through several conditions, including Condition 12 (Housing Choice) which requires the developer to demonstrate full compliance with Part M4 (2) (for 90% of dwellings) and Part M4 (3) (for 71 of the dwellings) prior to commencement of development, Condition 17 (Mobility and Access Arrangements) which requires the submission and approval of access and approach details, and Condition 74 (accessible parking for K Blocks) which ensure accessible parking in near proximity will be provided.
- 16.31 Overall, it is considered that the conditions secured in permission, Ref: 16/3025/F, are adequate to ensure that accessible housing provision for the development is appropriate for use.

## **17. Non-residential Uses**

- 17.1 As set out in section 6.13 of this report, development includes a non-residential spaces at ground floor level, which equate to 959.1m<sup>2</sup>. The proposed commercial unit would fall within use classes E, F, F2 which as assessed in the associated s96A application are considered compliant with the use classes approved within the revised OPP consent and therefore acceptable in principle. The positioning of the units is considered beneficial to the scheme in design terms as they appropriately activate the ground floors spaces and no objection has been raised to this layout as set out in section 13 of this report. The final details and appropriate operation of the commercial premises would be controlled through the conditions secured under the associated s96A and extant permission. Overall, the proposed approach to the non-residential units is acceptable.

## **18. Environmental Compliance**

- 18.1 An Environmental Statement was submitted alongside the OPP (13/017/O) (2013 ES) and an Environmental Statement Addendum (2016 ESA) was submitted alongside the Revised Outline Planning Permission (16/3025/MA). The accompanying non-material amendment application to the OPP (24/0887/NM) is supported by a further Environmental Statement Addendum (further ESA) and this approach was agreed through a screening decision issued by the Council on 5 January 2024 (23/3844/EIA).
- 18.2 As set out in the non-technical summary, the further ESA concludes that significant effects, mitigation proposals, and residual effects associated with the proposed amendments to the OPP remain unchanged when compared to the 2013 ES and 2016 ESA in terms of: landscape and visual impacts; heritage impacts; air quality; noise and vibration; soil and groundwater; daylight, sunlight and overshadowing impacts; wind and microclimate impacts; and cumulative impacts. Topics scoped out of the 2013 ES included: Ecology, Archaeology, Water Resources, Waste, Socio-economics and Transport.
- 18.3 The reserved matters application is supported by an Environmental Compliance Report (ECR) prepared by Plowman Craven which covers several topics. The ECR and further ESA have been reviewed by the Council's independent third party environmental impacts assessment specialist, RPS consulting. While RPS raised some initial points of clarification which were resolved by the applicant, RPS have concluded that they concur with the applicant that the conclusions reached in the previous environmental impact documents remain unchanged.

- 18.4 The ECR confirms that the reserved matters application is consistent with the most up-to-date EIA. Accordingly, in terms of environmental impacts and cumulative impacts, the proposed development remains consistent with the impacts approved by the Council under the OPP and revised OPP.
- 18.5 In terms of socio-economics including of services and public amenities, the capacity of existing services to accommodate the proposed unit numbers was considered when the outline planning permission was assessed and approved, and was deemed acceptable due to the contributions secured within the Warren Masterplan s106 Agreement. Accordingly, on the basis that this topic was scoped out of the 2013 ES and because the number of homes accommodated on the site has not changed, officers do not consider socio-economics impacts of the development can be considered under the reserved matters secured by Condition 2 attached 16/3025/MA. And therefore, officers do not object to the development in terms of socio-economic impacts.
- 18.6 Comment from officers report for OPP (13/0117/O):  
*"If Outline Planning Permission is to be granted, the current application would be legally linked to the Section 106 Agreement associated with Outline Planning Permission (Ref: 08/1121/O) dated 15th February 2011 for the wider Warren / Royal Arsenal site (2011 Masterplan).*

*This Section 106 Agreement sets out all of the planning obligations and financial contributions that were deemed necessary in order to ensure that the granting of planning permission for 3,711 residential units and 26,362m<sup>2</sup> of non-residential floor space across the 2011 Masterplan for the wider Warren / Royal Arsenal site was considered acceptable by the Council.*

*These included for example, financial contributions and obligations in relation to local traffic and pedestrian highway improvements, public transport facilities, education, healthcare / social services and community facilities, amongst a whole range of other requirements. The current application is bringing forward the same quantum of development in a different form. Therefore, the proposed development does not have any greater impact than that already assessed and mitigated for within the Section 106 Legal Agreement for the wider site."*

## **19. Residential Amenity**

- 19.1 Policy D4 'Delivering Good Design' of the London Plan confirms the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding

overheating, minimising overshadowing and maximising the usability of outside amenity space. Policy D13 places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Policy D14 sets out the ways to reduce, manage and mitigate noise to improve health and quality of life.

- 19.2 London Plan Policy D12 sets out that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. London Plan D5 also asserts that development proposals should achieve the highest standards of accessible and inclusive design and includes requirements for developments to be designed to incorporate safe and dignified emergency evacuation for all building users.
- 19.3 GLA's Housing SPG (March 2016, Updated August 2017) states that dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements. Suitable plans have been provided. In addition, the SPG requires that each core be accessible to generally no more than eight units on each floor.
- 19.4 Core Strategy Policy H5 seeks to ensure an adequate standard of accommodation is provided to ensure satisfactory levels of residential amenity and quality of life for future occupiers. Policy DH(b) 'Protection of Amenity for Adjacent Occupiers' of the Core Strategy 2014 states that new development will only be permitted where it can be demonstrated that the proposal 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 un-neighbourly sense of enclosure.
- 19.5 These Blocks, Blocks D and K, are the last remaining blocks to come forward as part of the outline planning permission and are therefore situated in the context of the other development which was also approved as part of the Warren Masterplan under the outline planning permission, as amended by Ref: 16/3025/MA. The nearest sensitive receptors are: to the north Judd House, Deveraux House, Hampton Apartment, and 2 Duke of Wellington Avenue (Imperial Buildings); to the east Thunderer Walk (Minotaur and Ocean House), 5 New Warren Lane (Laboratory Pavillion), and 7 New Warren Lane (Tyger); to the south 91 Beresford Street (Royal Arsenal Hotel), 92 Beresford Street (Royal Sovereign House), and Riverside House; and to the east 6 Brigadier Walk.



- 19.6 As discussed in the preceding section of this report, the ESA submitted as part of the associated s96A and the ECR submitted alongside this reserved matters application demonstrate that the impacts of the proposed development remain as previously approved. The submission has been reviewed by the Council EIA consultant and an independent third-party expert on sunlight and daylight, and overall the Council have been advised the impacts arising from the proposed development are consistent with the impacts accepted under the outline planning permission.
- 19.7 The proposal is in accordance with the relevant parameter plan associated with the revised OPP (16/3025/MA) and associated s96A application, in terms of the overall maximum heights and uses as previously highlighted with the detailed design elements fully considered as part of this reserved matters application. The achieved separation distances are considered compliant with the minimum separation distances shown on the minimum and maximum height parameter plans which allow for some flexibility in terms of the final placement of buildings within designed minimum and maximum height zones. Particularly, the consented relationship with Plot B remains consistent with minimum separation distance of 15.5m considered when the buildings on Plot B were approved under ref: 14/0604/R. During construction, there is not considered to be an unacceptable impact upon all adjoining residential neighbours which cannot be mitigated or controlled via the relevant conditions which were imposed when the outline planning permission was approved (notably Condition 7 (compliance with Environmental Statement mitigation measures), Condition 28 (demolition and construction methods statement), Condition 32 (construction), Condition 33 (Code of Construction Charter), Condition 34 (road conditions during construction), Condition 35 (disposal of construction waste), Condition 63 (ecological mitigation scheme), Condition 72 (Construction Logistic Plan), Condition 73 (water transport strategy for construction waste), and 23 relating to construction environmental plans and management plans respectively).
- 19.8 Officers consider that, in terms of Residential Amenity, the proposal complies with the relevant policies of the London Plan (2021), the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

## 20. **Pollution**

### Air Quality

- 20.1 NPPF chapter 14 states the planning system should support the transition to a low carbon future and take a pro-active approach.

- 20.2 London Plan Policy S11 sets out a number of matters to tackle poor air quality and stipulates that, as a minimum, development proposals must be at least Air Quality Neutral. Any planning application for a development of ten or more units requires an air quality assessment which needs to be in accordance with London Plan requirements, GLA Supplementary Planning Guidance and relevant EPUK & IAQM Guidance.
- 20.3 At a local level Core Strategy Policy E(a) and E(c) require development proposals to assess and minimise the likely impact of development on air quality. Since declaring the whole Borough as an Air Quality Management Area (AQMA), the Greenwich Air Quality and Action Plan has been developed to manage and reduce air quality impacts, particularly along major roads
- 20.4 The outline planning permission was considered acceptable in air quality terms by the Council in light of mitigation measures set out in the approved Environmental Statement, including in relation to the use of a Combined Heat and Power network, and a financial contribution towards the Greenwich Council's Air Quality Action Plan was also secured. Condition of consent are secured the revised OPP which control air quality, including Condition 69 (Combined Heat and Power (CHP)) and Condition 70 (CHP emission standards) and the conditions controlling construction practices and emissions as set out in section 19.7.
- 20.5 As set out within the Air Quality chapter within the environmental compliance review (Chapter 4.3), an assessment of baseline air quality conditions has been carried out relevant to the Proposed Development and comparing to the baseline conditions from the 2013 ES, noting that there is a reduction in overall homes and car parking spaces for the Proposed Development in comparison to the original OPP. Further, the ECR finds that there would be no unacceptable construction impacts with a dust impacts with a dust management plan in place.
- 20.6 As summarised in the Planning Statement, the ESA Addendum Air Quality chapter has also considered matters at the operational phase of development and considers that there will not be an increase in pollutant concentrations as a consequence of road traffic emissions or emissions associated with the site-wide energy strategy, therefore mitigation is not necessary. The decrease in generated trips relative to the OPP, assessed in the 2013 ES, as well as the introduction of offsite air source heat pumps to the energy strategy would be considered a reduction in emissions and an improvement in local air quality than the OPP. Overall, the Planning Statement concludes that the proposed

development would not lead to a further deterioration of air quality or breach current air quality targets.

- 20.7 As set out above in section 18, the ECR and ESA have been reviewed by the applicants EIA consultant who have found the conclusions reached by the applicant acceptable. Further, the proposals have been reviewed by the Council's Environmental Protection Officer in relation to Air Quality. The Environmental Protection Officer has concluded that no objections are raised to the development subject to adherence with approved environmental documents and the imposition of a non-mobile road machinery condition. This condition is therefore recommended along with a condition securing a dust management plan and, considering the advice received from the Council's EIA consultant and the Environmental Protection Officer, Officers raise no objections in terms of air quality. Accordingly, the proposed development has been assessed as compliant with London Plan Policy S11, RBG Core Strategy Policy E(c), as well as guidance contained within the NPPF. The Proposed Development is therefore considered to be acceptable.

#### Contamination

- 20.8 Chapter 15 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by remediating and mitigating contaminated land, where appropriate, and should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 20.9 London Plan Policy SD1 requires the development should take appropriate measures to deal with contamination that may exist. Meanwhile, Core Strategy Policy E(e) states that the Council will need to be assured that where contamination is found, development can be built and occupied safely without any adverse environmental or health impacts.
- 20.10 The Soil and Groundwater chapter within the ECR (Chapter 4.5) considers the potential impact from the disturbance of contamination and hazardous materials on human health and the environment, and the impacts of potentially contaminated ground or groundwater conditions on existing adjacent structures and the Proposed Development, and the findings are largely in line with the main risks identified within the 2013 ES.
- 20.11 The submission materials have been reviewed by the Council's Environmental Protection Officer who has raised no objections to the proposed development subject to the assurances made in the application and adherence with the conditions imposed through the revised OPP, which include

Condition 23 (Contamination), Condition 24 (Verification Report), and Condition 25 (reporting Unexpected Contamination). Further, the Environment Agency have been consulted and have raised no objection and have cited the following conditions secured on the revised OPP as controlling contamination impacts to ground and water:

- condition 23 (contamination – preliminary risk assessment; site investigation scheme, risk assessment; site investigation, risk assessment, options appraisal, remediation strategy; verification plan);
- condition 24 (verification report);
- condition 25 (unexpected contamination);
- condition 31 (piling method statement);
- condition 54 (finished floor levels);
- condition 62 (surface water drainage scheme);
- condition 63 (ecological mitigation, compensation and enhancement scheme);
- condition 64 (landscape and ecology management plan);
- condition 67 (infiltration of surface water drainage).

## **21. Transport and Access**

- 21.1 London Plan Policy T4 encourages sustainable and interconnected forms of transport. Development that is harmful to highways capacity and congestion should be mitigated, and new development should not increase road danger.
- 21.2 At a local level, Core Strategy IM4 supports the development of an integrated and sustainable transport system that is extensive in coverage and meets the needs of residents, businesses, workers and visitors. The policy aims for all development in the Borough to contribute to improved accessibility and safety and reduce the use of the private car and the need to travel. Importantly, development should be designed for the needs of pedestrians, cyclists and public transport users first.
- 21.3 Policy IM(a) of the Core Strategy states that when planning transport provision for major developments and extensive sites where comprehensive development can take place, developers should have regard to the road hierarchy, including provision of speed management, incorporation of appropriate traffic calming measures and encouraging residential roads to be designed as shared spaces.

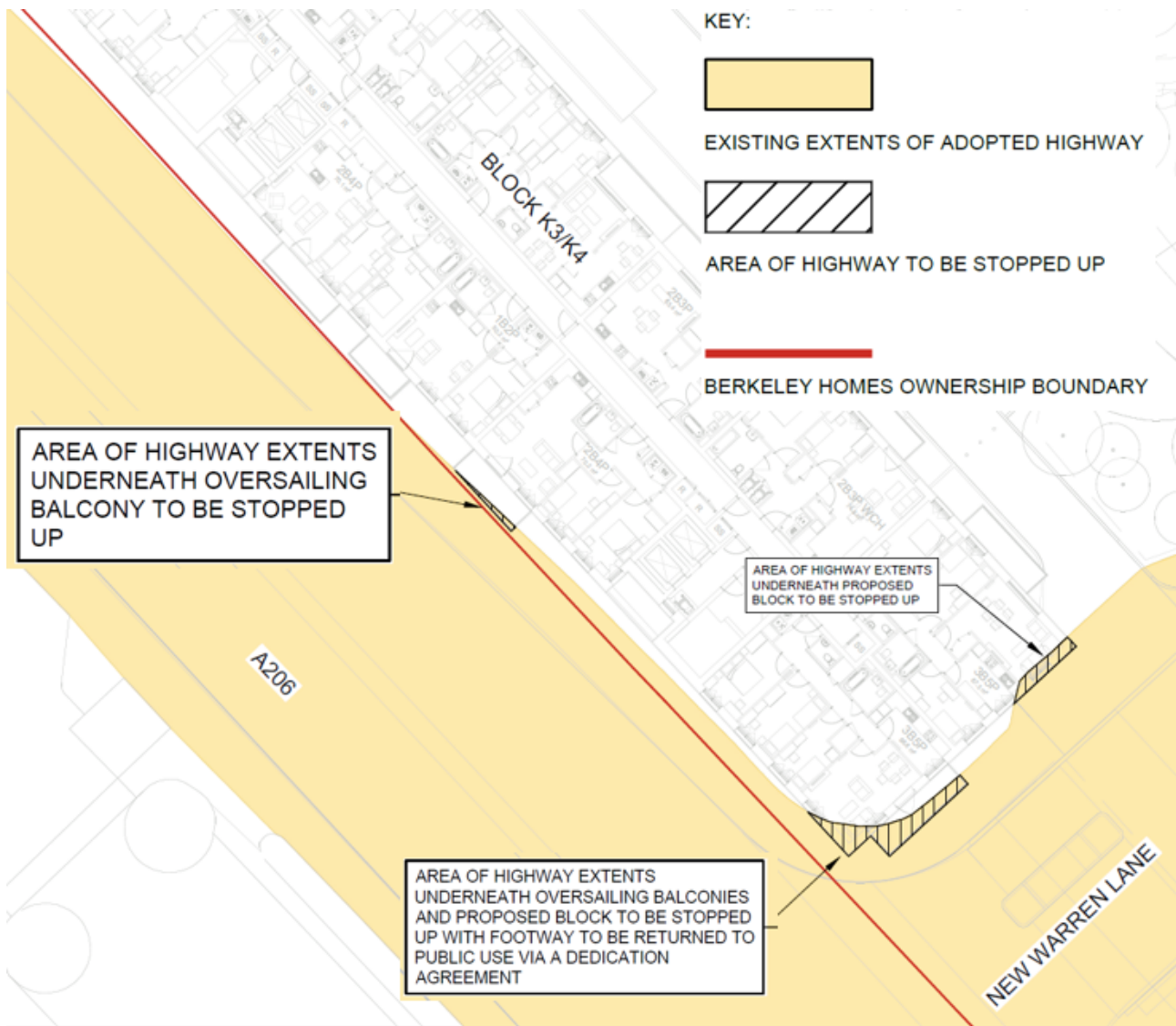
### Access and Layout

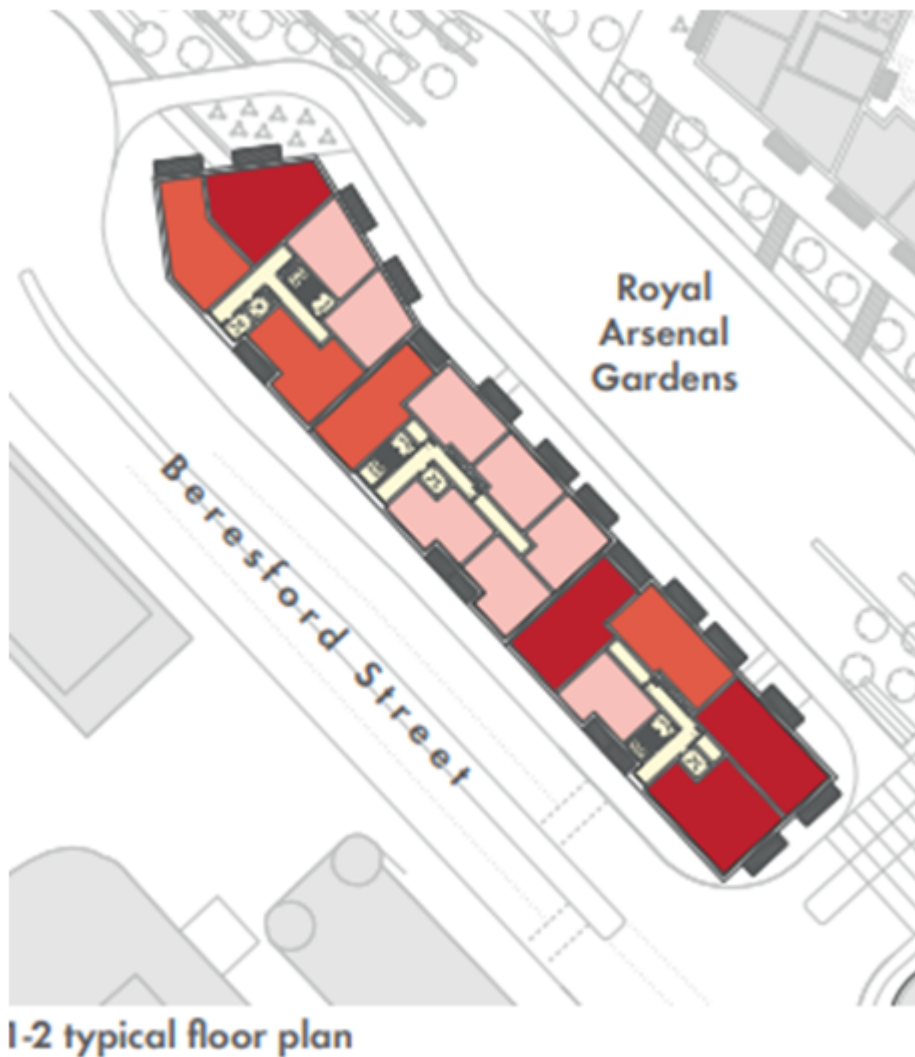
- 21.4 As part of the outline permission for Plots D and K for up to 717 residential units and 1,682 sqm of commercial space was proposed with 253 residential car parking spaces at a ratio of 0.35 and 140 public car parking spaces.
- 21.5 As set out in the associated s96A application, the access is proposed to run through the northern extent of the park, instead of exiting on to Beresford Street. The section of the southern access road has been reoriented to run along the existing buildings, avoiding unnecessary disruption the park land. The Transportation Assessment submitted under the reserved matters confirms that the segment of the road running adjacent to the K Blocks will function as a service road which is intended for use by refuse vehicles, deliveries to Buildings K3 K4 and K5, servicing vehicles, blue badge holders and emergency access if required. Further, the Transportation Assessment confirms that the route will not be open for general traffic and will have bollards at the access and will be signposted accordingly.
- 21.6 This layout, subject to modifications to resolve concerns raised by the Council's Waste Strategy Department, has been accepted from a waste management perspective in terms of adequately accommodating refuse collection and the required vehicle tracking curves. Transport for London have raised some concern about this surface being shared by pedestrians and vehicles due the proposed width, but have noted this is for the Local Highways Authority to advise. While the layout has been amended slightly, Officers note that the area to the east of Blocks K5-3 was always intended as a shared surface and is indeed needed for this purpose to ensure on-street disabled parking bays are provided in close proximity to the K Blocks as secured by Condition 78 attached to the revised OPP. The Council Highways Officer has reviewed the proposal and has advised that any road safety issues with the shared surface can adequately be resolved through adherence with the approach set out in the Transportation Statement and the establishment of signage alerting traffic and pedestrians of the shared surface. Accordingly, Officers consider the layout of the shared surface adjacent to the K Blocks is acceptable and condition of consent related to management and signage is recommended.
- 21.7 It is noted that the main spinal footpath/cycle way that runs through the park area would encourage those users to cross the New Warren Lane at its widest point. This creates a potential safety issue for vulnerable users as they are in the carriageway for the longest time where there is no protection or measures such as dropped crossovers or islands to assist them. Consideration should be given to either relocation, narrowing the road or providing

additional measures. A zebra crossing is present to the north of the road at the bend and a signal controlled crossing to the south. To support this, a Road Safety Audit is secured in the proposed heads of terms as well redesign of the roading in this area to resolve any issues.

21.8 The Highways officer also identified that there is such an unorthodox loading area provided for Block D off New Warren Lane at the bend in the road which is defined by an excessive amount of bollards. Officers consider that this layout is likely to create confusion for drivers and promotes large vehicles to manoeuvre, (include reverse) near to a signal controlled junction. It is recommended that a standard bay is considered instead allowing vehicles to drive in to, and out of, in a forward gear. To support this, a Road Safety Audit is secured in the proposed heads of terms as well redesign of the roading in this area to resolve any issues.

21.9 The Highways Officer has raised concern as the southern most balconies in Block K oversail the adopted public highway and the corner of the building at New Warren Lane partially sits on and over existing adopted highway, due to the arrangement of the chamfered lower ground floor. The extent of the oversailing is shown below in figure 6. This is shown alongside figure 7 which is an extract from the design and access statement for the outline planning permission which officers consider demonstrates a degree of oversailing for this block was approved under the outline planning permission. The applicant has indicatively repositioned the balconies to minimise oversailing and the final placement would be agreed by condition. Generally, the Highways Officer advised that the Highway Authority do not support balconies oversailing the public highway in order that users of a public highway are not endangered as a result of a building oversailing the public footway. If the Planning Board approves the application, the developer will after the grant of the reserved matters approval need to obtain a highways oversailing licence from the Council's highway authority under the Highways Act 1980. The developer will also have to apply for and obtained a stopping up order to be able construct Block K in respect of the corner of the building at New Warren Lane partially sits on existing adopted highway. The usual process for applying for this type of stopping up order is under S247 of the Town and Country Planning Act 1990. The licence and stopping up order will need to be obtained before the relevant parts of the development are carried out. However, the Council's Planning Board has to consider the highways and other implications and impacts of these aspects of the proposal in considering this application.





**Figure 7 Extract from Design and Access Statement attached to Ref: 13/0117/O which also indicated oversailing**

21.10 Planning Officers note that, notwithstanding the associated s96A amendment, the boundaries of Blocks K5-3 with Beresford Street and New Warren Lane remains consistent with the approved outline parameter plans and accordingly this arrangement is understood to already benefit from planning permission. While this does not resolve the comments of the Highways Officer, Planning Officers consider this is a material consideration of determining this reserved matters application, alongside the concerns of the Council's highways department, which the Planning Board should consider. Accordingly, in light of the principle of this arrangement being approved under the OPP and revised OPP and whilst noting the concerns of the Council's highway officer, Planning Officers do not object to layout of Blocks K3-4 in relation to the public highway.



21.11 Overall, subject to the details provided and the secured conditions and heads of terms, no objections are raised to the proposed access and layout arrangements.

Parking and cycle parking

- 21.12 London Plan T6 and Table 10.3 set out parking standards for new development. Where parking is provided the London Plan require that initially 3% disabled parking should be provided and indicate that a further 7% could be provided in the future if required. All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles, with at least 20% of spaces having active charging facilities and passive provision for all remaining spaces.
- 21.13 At a local level, policy IM(c) of the Core Strategy states that developments must provide the minimum level of car parking provision necessary for people with disabilities. Developments supported by a high level of public transport accessibility and within Controlled Parking Zones (CPZ) should be car free. Policy IM(c) also strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments and seeks the provision of electric charging points in accordance with the minimum standards set out in the London Plan
- 21.14 According to the London Plan the site is deemed to be an “inner London” location, and inner London sites with a PTAL score of 4 or better should be car free developments.
- 21.15 London Plan Policy T5 and Table 10.2 set cycle provision standards. This is supported by Core Strategy Policy IM(c). Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.
- 21.16 However, the quantum of car parking provision has already been established under the consented application (23/3025/MA). Following a review, of the car parking, the number of spaces to be provided is also to be reduced to 144 spaces compared to 253 in the Outline Consent. The public car park spaces have also been omitted on the basis that they were largely related to the Waterfront leisure centre which is relocating to General Gordon Square. The public parking should however still be retained until the new site is operational.

- 21.17 Most of the parking spaces are provided in the basement car park although car parking for blue badge holders is provided for Plots D and K in a mixture of on and off-street bays, 6 being in the car park with the remaining 15 dispersed along the access road around block D. This is in line with the London Plan requirements for 3% of all units to be provided with a bay for the disabled. The 15 spaces provided on street align with core entrances to reduce distances between spaces and access doors and will all be provided with electric vehicle charging facilities. The 7 provided within the basement are also close to core entrances. The layout has been further revised through discussions with the Council's Occupational Therapist to ensure there are no objections within the required clear widths for disabled parking spaces. The applicant has suitably overcome the Occupational Therapists concerns through a revised layout which has resulted in a further reduction by 3 Parking spaces, as shown on Drawing Z429- PRP01- DZ- BI- DR- A-880-610 Rev P01. This has resulted in a reduction in the proposed parking to 141 spaces. Overall, the layout of spaces is adequate.
- 21.18 A Management Strategy is to be employed to manage the spaces although it is not supported that a lease is used but rather a permit system is adopted in order to allow flexibility in allocation and any future change. The applicant has confirmed that this will be agreed through the discharge of conditions attached to the revised OPP.
- 21.19 With regard to cycling, for Plot D, 895 long term cycle spaces are proposed and for Plot K 367 long term cycle spaces. A further 22 short stay spaces are provided in the public realm mostly near core entrances. Visitor parking for the K buildings does however seem clustered to the north of the building K5 when it is reasonable to assume that provision should be dispersed. Cycle parking is being provided in line with both London Plan standards for numbers and London Cycle Design Standards (LCDS) for layout requirements. Of the total spaces available, 20% will be provided as Sheffield Stands with a further 5% of spaces to be enlarged spaces to cater for those with cargo or adaptable bikes. The remaining 75% are to be provided in two tier racks. TfL have raised issues with the proposed cycle design, particularly in relation to the dispersion of larger sized space which they consider should not be clustered within one cycle store and due to some Sheffield stands being located underneath tiered cycle parking which restricts access. The applicant has declined to resolve these issues now and has indicated that these issues would be resolved as the submission of details stage. To ensure these issues are appropriately resolved, a revised cycle parking conditions is proposed which secures that issues raised by TfL will need to be resolved through a revised design, including the loss of car parking if necessary.

- 21.20 As there is a reduction in car parking from the original outline consent it is anticipated that more people will need to cycle, therefore, the presence of high-quality cycle parking is integral to the updated design, as well as good connectivity to the wider cycle network infrastructure. TfL and the Council are currently exploring a possible cycle extension of a route between the Woolwich ferry and that currently existing on Plumstead Road to the east. Given the potential increase in cycle users from the outline application the Highways Department recommend that a contribution should be sought towards cycle facilities in the area.
- 21.21 The applicant has agreed to make a contribution of £127,296 to be used towards local cycle improvements and the Highways Department has advised that this is considered acceptable in this instance to offset any impacts resulting from the proposed reduction in car parking. Overall, Officers consider the reduction in car parking is consistent with the aspiration for minimising reliance on car travel and car free development set out under Policy T6 of the London Plan 2021. In light of the proposed contribution, Officers consider the proposed reduction in car parking is acceptable.
- 21.22 Taking all of the above into account, the level of car parking proposed for this development is considered to be acceptable and in accordance with the approved outline parameter plans.
- Refuse and Recycling and Delivery and Servicing
- 21.23 London Plan Table 3.1 states recycling and waste disposal, storage and any on site management facilities should be convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services.
- 21.24 Residential waste storage will consist of separate 1,110 litre Eurobins for refuse and dry recyclables, and 500 litre wheeled bins for compostable waste, in accordance with local authority guidance. Waste stores have been located within the curtilage of the residential buildings at ground level to ensure easy access for both residents and waste collection operatives.
- 21.25 Waste storage for these commercial spaces will consist of 1,100 litre Eurobins to be collected by a contractual arrangement. The waste storage areas will be located within the curtilage of the buildings for ease of use and to ensure accessibility for commercial waste collection operatives. The applicant advised that the Proposed Development has also been designed to be compliant with all relevant waste management policy and will manage and dispose of waste in a sustainable manner.

21.26 The Planning Submission explains that the servicing strategy for the application has been developed with the wider Warren/Royal Arsenal Masterplan in mind, and it includes the need to collect Plot A bins from outside Plot D and the requirement to service the Hotel, located at the junction between the A206 and New Warren Lane. As described above, the movement of large vehicles around the estate and ensuring they are able to access all buildings has also been considered, within the shared surface which connects to the road layout around Block D. As set out above, the layout and manoeuvring room for service vehicles is considered acceptable.

21.27 The proposed development has been reviewed by the Council's Waste Strategy team who, subject to clarifications and minor design revisions made through the course of processing the application, have confirmed that no objections are raised to the proposed development subject to the discharge of the relevant conditions attached to the revised OPP. Officers note that Condition 36 (refuse and recycling) will require full details of the waste strategy to be submitted to the Council prior to commencement. Further, Condition 71 requires the submission of a delivery and service plan which will ensure the operation of commercial units is fully considered. As explained above, some concerns were raised with the loading bay in front of Block D, and these would be resolved through the secured Road Safety Audit and redesign if necessary. In light of the comments received and existing and proposed conditions and heads of terms, no objection is raised to the proposed waste and refuse arrangements and approach to deliveries and servicing.

#### Construction

21.28 In accordance with London Plan Policy T7, it is recommended that the Construction Logistics Plan or CLP be secured through condition. This was secured by condition 72 within the planning permission 16/3025/MA.

21.29 Further, the full list of construction mitigation conditions set out in section 19.7 above will further ensure impacts of construction traffic are suitably minimised.

#### Travel Plans

21.30 Travel plans are an established tool to manage travel behaviour and the application is supported by a Residential Travel Plan and a Framework Travel Plan (for commercial elements of the development). As requested by TfL it is recommended that the travel plans be designed to deliver the Mayor's strategic mode shift target for 90% of all trips to be made by public transport, walking and cycling by 2041 and be secured through condition.

21.31 A travel plan is secured through the existing s106 agreement and TfL have confirmed that the existing requirements under the s106 are acceptable.

## 22. **Sustainability, Energy and Ecology**

### Energy

- 22.1 London Plan Policy SI2 requires major development to be net zero-carbon. This means a minimum on-site reduction of at least 35% beyond Building Regulations is required for major development. This requires reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation;
  - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - 4) be seen: monitor, verify and report on energy performance
- 22.2 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. Where it is clearly demonstrated that the zero-carbon cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site provided that an alternative proposal is identified, and delivery is certain.
- 22.3 Energy performance criteria, including connection to a Combined Heat and Power (CHP) network are required under the existing Warren Royal Arsenal Masterplan s106 agreement. The applicant proposes to decarbonise their heating network with the installation of air source heat pumps (ASHPs) outside The Ropeyards application area. In this way, although the application diverges from the current approach secured under the s106, a similar approach in terms of a single site network is retained, but the divergence allows for a lower carbon emissions producing heating source (ASHPs) to be prioritised over the use of the current CHP and gas boiler system. The Council's sustainability consultant has advised that the plan to separate Ropeyard from the wider Royal Arsenal Riverside CHP network is acceptable and as they consider the proposed system with heat exchangers will allow the site to operate at a lower and more carbon efficient temperature. In this way, the Council's sustainability consultant advised that 100% of the Ropeyard heat demand can effectively come from the ASHPs. The proposal is assessed under

the Development Plan and the Council's sustainability consultant has recommended heads of terms and further conditions to ensure the development proceeds as proposed by the applicant, and these are discussed further below.

### *Sustainability and Energy*

- 22.4 Paragraph 162 of the NPPF (2023) states that, in determining planning applications, LPAs should expect new developments to comply with policies and requirements for decentralised energy supply unless this is demonstrated not to be feasible or viable. Moreover, the same paragraph establishes that new developments are expected to take account of landform, layout, building orientation, massing, and landscaping to minimise energy consumption.
- 22.5 Policy SI 2 of the London Plan (2021) requires major development to be net zero-carbon and policy EI of the Core Strategy states proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the energy hierarchy. Any shortfall will be met through a s106 carbon offset contribution. Policy SI 2 adds to the existing energy hierarchy which requires development to monitor, verify, and report on energy performance. This policy is reinforced by Greenwich Council's requirement for the automated monitoring of renewable/low-carbon energy equipment to confirm compliance with the submitted energy strategy.
- 22.6 Policy SI 3 recognises that combined heat and power (CHP) may have negative effects on London's air quality. The policy also recognises that because the carbon intensity of grid electricity is steadily dropping, electric air-source-heat-pumps are a better carbon reduction option than gas fired CHP.
- 22.7 The application is supported by an Energy Strategy produced by Hodkinson in March 2024 (v1). As set out above, the Council's sustainability consultant has advised that the proposal is acceptable. The proposed development will connect to the existing Royal Arsenal Riverside heat network hydraulically through heat exchangers. Currently the network is served by CHP and Gas boilers, but there is a longitudinal decarbonisation strategy in place which will see the gas systems replaced with ASHP. The "be Clean" carbon reductions are based on this ASHP scenario. The plan is to separate Ropeyard from the wider RAR network with heat exchangers which will allow the site to operate at a lower and more carbon efficient temperature. In this way 100% of the Ropeyard heat demand can effectively come from the ASHPs, and not from the existing CHP and Gas boiler system. Further, Variable Refrigerant Volume

(VRV) Air Source Heat Pumps will provide heating and cooling for the commercial space. The Council's sustainability consultant advised that Photovoltaic Panels (PV) has been realistically maximised with arrays located on the proposed blocks.

- 22.8 At the current design stage, the applicant proposes that the overall site-wide CO<sub>2</sub> emissions will be cut by at least 76.46% against Building Regulations Part L 2021 (using SAP 10.2 emission factors), with 13% through "Lean" efficiency measures, 63.34% "Clean" reduction through connection to the (decarbonated) RAR heat network, and 0.12% through "Green" renewable energy PV. This results in a shortfall of 4,902 tonnes CO<sub>2</sub> (over 30 years) in the zero-carbon. To offset this in accordance with the development plan, the submission proposes an "offset" S106 payment at £95 per tonne to the Council of £465,865. However, to enable flexibility in case of a shortfall in meeting the anticipated target of 76%, the applicant has agreed to an increased offset payment of £989,000, which is consistent with a 50% reduction in carbon emissions, with the potential to achieve a better reduction and a lower offset contribution at the submission of details stage.
- 22.9 If after one year of in-situ monitoring the PV does not deliver, within a reasonable margin of error, the carbon reductions predicted in the Energy Strategy then the Developer may need to pay an additional Carbon Offset contribution to mitigate some or all of the shortfall.
- 22.10 The London Plan (policy S12) introduces a fourth step to the existing (be Lean, Clean, Green) energy hierarchy of "be Seen". In addition to the GLA 'be Seen' policy, Greenwich Council also requires the additional physical monitoring, and daily performance analysis, of the renewable/low-carbon energy through an automated monitoring system. This is to ensure real-time in-situ compliance with the Council and the Mayor's renewable energy policies and to enable the effective longitudinal maintenance and operation of the equipment.
- 22.11 In line with this, Greenwich Council will require the monitoring of the PV arrays to evaluate their performance for a period of 5 years. Suitable monitoring devices must be fitted by the Applicant to achieve this in consultation with the Council. The Applicant will be required to sign a Legal Agreement contract with the Council to implement the monitoring process, and a S106 contribution may be sought for this. Energy monitoring devices required to carry out the monitoring are:
- PV (GPRS) smart meters.
  - SIM card and data processing (5 years).

22.12 While the applicant has agreed to a contribution and has anticipated a reduction of 76.46% against Building Regulations Part L 2021 (using SAP10.2 emission factors), they have sought flexibility to avoid any need to vary planning conditions or obligations should there be any shortfall or exceedance of the anticipated reduction. To enable this flexibility, while also ensuring compliance with the Development Plan, the Council's sustainability consultant has advised that it is acceptable to condition emissions reductions to a minimum of 50% beyond Building Regulations Part L 2021 and using SAP10.2 emission factors as this approach is in line with Table I of the GLA Energy Assessment Guidance (2022), and well exceeds the minimum threshold of 35% emissions reductions stated in London Plan Policy SI2. The applicant has agreed to this approach, and a proportionate increased offset payment of £989,000 with potential to achieve a better reduction and a lower offset contribution at the submission of details stage.

22.13 Officers consider this approach is acceptable as this is in compliance with the stated GLA guidance and as the applicant has confirmed the intention is to achieve as close to the proposed 76% reduction as possible and any shortfall to achieving zero carbon emissions will be appropriately mitigated. This contribution and associated monitoring are secured through the proposed heads of terms. Accordingly, Officers consider that the proposed development would comply with policy SI 2 of the London Plan (2021).

*Whole Life Carbon Assessment (Operational and Embodied Carbon)*

22.14 Policy SI 2 of the London Plan (2021) requires referable applications to include a Whole Life-Cycle Carbon ('WLC') assessment against each lifecycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the building's life. Supporting policy SI 2 and SI 7 of the London Plan (2021), the GLA has produced Whole Life-Cycle Carbon Assessments – London Plan Guidance.

22.15 The application is supported by a Whole Life Carbon (WLC) strategy produced by Hodkinson in March 2024 (v3) which confirms that the development will be comfortably compliant with the GLA Benchmark targets. The Council's sustainability consultant advised that the submitted information is acceptable in regard to WLC and officers consider compliance with SI 2 and SI 7 has been achieved. Compliance with WLC requirements and the assurance in the submission are secured by condition.



*Circular Economy (Waste)*

- 22.16 London Plan (2021) policy SI 7 referable applications to include a Circular Economy Statement and sets out a series of circular economy principles that major development proposals are expected to follow, which include, conserve resources, increase efficiency and source sustainably, design to eliminate waste (and for ease of maintenance) and manage waste sustainably.
- 22.17 The application is supported by a Circular Economy statement prepared by Hodkinson dated March 2024 (v.5) which aims to demonstrate that the proposed development has considered, and will incorporate, circular economy principles into all aspects of the design, construction, and operation process. The Council's sustainability consultant has raised no objection to the proposed approach and has recommended a Circular Economy condition of consent to ensure the development proceeds as proposed. Accordingly, officers consider compliance with London Plan Policy SI 7 has been suitably demonstrated.

*Overheating*

- 22.18 Policy SI 4 of the London Plan (2021) requires major development proposals demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy.
- 22.19 London Plan Policy D6 highlights the need for new developments to be designed to avoid overheating. Part B of Policy SI4 in the London Plan requires major development proposals to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
  - 2) minimise internal heat generation through energy efficient design;
  - 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
  - 4) provide passive ventilation;
  - 5) provide mechanical ventilation; and
  - 6) provide active cooling systems.
- 22.20 An Overheating Analysis, within the submitted Energy Statement prepared by Hodkinson dated March 2024 (v.2), with proposed mitigation measures has been submitted. The analysis assumes full mechanical ventilation and heat

recovery (MVHR) with additional bypass cooling in units with potential noise issues. The Council's sustainability consultant has advised that the proposed development would be compliant with Part O (TM59/Guide A) and follows the TM49 methodology of modelling against the DSY1 average summer year (2020) weather data files, as well as the more intense (but non-mandatory) DSY2 (2003) and DSY3 (1976) data files. Further, the Council's consultant advised that all rooms comply with TM59 for criteria (a) and (b) when modelled against DSY1. The sustainability consultant has recommended conditions of consent to ensure the development proceeds as proposed in terms of overheating.

- 22.21 In light of the advice received, and subject to the recommended conditions of consent, officers consider the proposed development is acceptable in regard to overheating and compliant with London Plan Policy SI 4 and D6.

*Biodiversity and Ecology*

- 22.22 Paragraph 180 of the NPPF (2021) requires planning decisions to contribute to, and enhance, the natural and local environments, including through protecting and enhancing sites of biodiversity value and through minimising impacts on and providing net gains for biodiversity.
- 22.23 Policy G5 of the London Plan (2021) outlines that proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. The policy contains greater emphasis on green infrastructure and proposes that new developments achieve quantifiable net gain using the 'Urban Greening Factor' to achieve a score of 0.4 (housing) or 0.3 (commercial). This is supported by Policy G6 which states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 22.24 At a local level policy OS4 of the Core Strategy requires that new development enhances the borough's rich biodiversity and geodiversity. Policy OS(f) expands on the aspects that must be taken into account when assessing ecological factors, including the requirement for appropriate surveys to be undertaken. Policy DH1 requires all developments to enhance biodiversity.

*Biodiversity net gain*

- 22.25 In line with Policy G6 of the London Plan (2021), development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. As noted above a UGF Assessment has been submitted and a Biodiversity Net Gain Report has also been submitted. Officers note that, in accordance with government guidance, Biodiversity Net Gain requirements under the

Environment Act 2021 were made mandatory from 12 February 2024 and were in force when the application was made valid on 12 March 2024. However, in accordance with [Planning Advisory Service guidance](#), the approval of reserved matters for outline planning permissions are not within the scope of biodiversity net gain (as they are not a grant of planning permission).

22.26 The application submission is accompanied by an Ecological Assessment and Biodiversity Net Gain Report, prepared by Ecology Solutions. On-Site habitat surveys were undertaken in February 2023 and January 2024 and a desk-based study was also undertaken to inform this assessment.

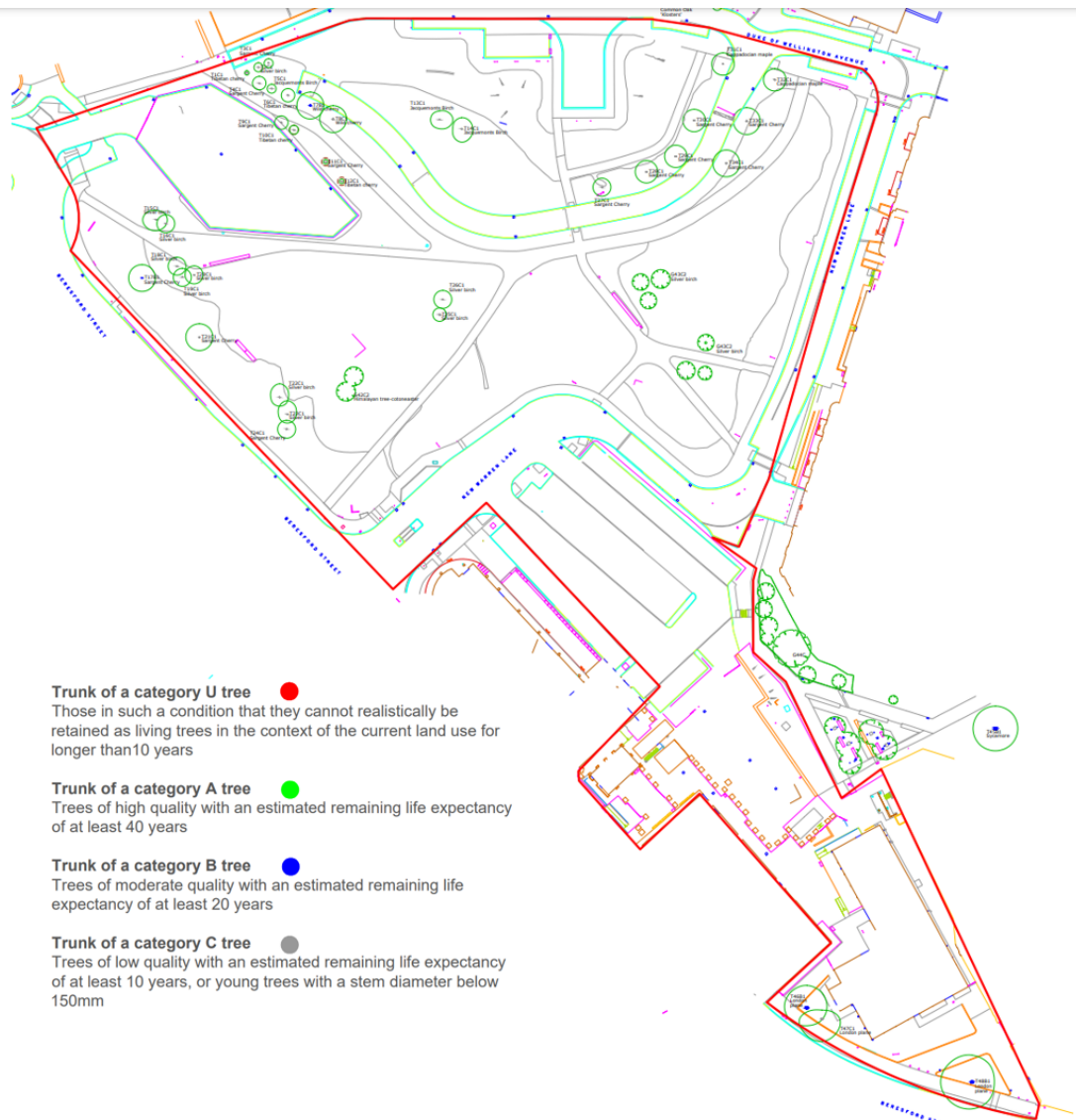
22.27 While the Proposed Development is not subject to the mandatory 10% Biodiversity Net Gain, the scheme has been assessed using the Statutory Metric with this illustrating the development far surpasses the minimum 10% Biodiversity Net Gain (BNG) achieving an anticipated BNG of 62%. Therefore it is considered that the proposed development meets national and local policy requirements. The Council's EIA and ecology consultant, RPS, subject to points of clarification raised through the course of processing the application, has confirmed that the applicant has correctly assessed the reported baseline and anticipated BNG of 62%. Accordingly, the proposed development is considered acceptable in regard to biodiversity and compliant with London Plan Policy G6. Further, officers note that this evidence supports the finding that the landscape proposals would provide for a high quality environment to replace any existing planting lost as a result of the development.

*Urban Greening Factor and landscaping*

22.28 With regards to urban greening, the requirements of London Plan Policy G5 are noted, with a UGF target score of 0.4 for developments that are predominantly residential. As set out within the accompanying Design and Access Statement, the landscaping section confirms that the Proposed Development achieves a UGF of 0.4, meeting the policy requirement. Full details of the UGF can be found in the accompanying DAS. The proposed approach to Urban Greening Factor has been assessed by the Council's Environmental Impact Assessment consultant and ecologists, RPS. RPS have concluded that the UGF has been appropriately calculated and accordingly officers consider the proposed development would comply with London Plan Policy G5.

## Trees

- 22.29 Policy G7 of the London Plan (2021) seeks to ensure that existing trees of value are retained and encourages the planting of new trees and woodlands in appropriate locations. It states that the planting of additional trees should generally be included in new developments, particularly large-canopied species. The policy further notes that where a planning application results in the loss of trees there should be adequate replacement based on the existing value of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system.
- 22.30 Policy OS(f) of the Core Strategy states that development decisions will be based on the requirement that landscaping schemes should include environmentally appropriate planting using locally native species and demonstrate appropriate irrigation plans for landscaping.
- 22.31 The application is supported by an Arboricultural report (prepared by GRS Arboricultural Consultant Ltd dated 1 March 2024) which advises that in total forty-six individual trees and two groups were surveyed and that to facilitate this development it will be necessary to remove all the trees within the area to be developed, with the exception of the three trees adjacent to Beresford Street which are proposed to be retained. As noted previously, the northern extent of the development falls within the Royal Arsenal Conservation Area and the application has confirmed that 10 tree and tree groups will be removed within the Conservation Area, however the applicant considers that these are of low quality and do not warrant preservation.
- 22.32 The existing tree survey is shown below in Figure 8 and identifies that the majority of trees on the application site are classed as category C Trees with some recorded Category B trees. The proposed planting plan and indicative planting strategy are set out in the submitted design and access statement, and the submitted planting plan is shown below in figure 9. This shows that the proposed planting strategy will exceed a 1:2:1 replacement ratio, as evidenced by the achieved 62% BNG. The planting strategy features a high proportion of native species and the strategy sets an approach to target planting choices based on location within the scheme, including street trees, park trees, play area trees, and podium level trees.



**Figure 8 Existing tree survey (Arboricultural Report GRS date 1 March 2024)**



**Figure 9 Planting Plan as shown in Design and Access Statement and plan Z429-HTA01-STW-ZZ-DR-L-880-I30**

22.33 The Tree Officer has reviewed the landscape proposals set out in the Design and Access Statement, the submitted landscape drawings, and the submitted Biodiversity Net Gain assessment. Subject to the confirmation of the proposed tree diameters at the time of planting the Tree Officer has raised no objection to the proposed loss of trees or the replacement strategy. The applicant has provided a revised Biodiversity Net Gain assessment which details the locations and size at the time of planting, which are shown as Plan ECO (Post-Development Habitats Rev B March 2024) within the appendices of the Biodiversity Net Gain Report prepared by Ecology Solutions (10995.BNGReport.vf1 dated March 2024). The Tree Officer has reviewed these details and has confirmed they have no objection to the proposed

development. To ensure that the retained trees would be appropriately preserved (T46BI London plane, T47CI London plan, and T48BI London plan as identified within the Arboricultural report Reference GRS.129.22 dated 1 March 2024 and shown on plan Z429-HTA01-STW-ZZ-DR-L-880-130 Rev P00) RPS recommend an arboricultural methods statement and this has been adopted. Accordingly, officers consider the proposed development, despite the loss of trees including within the Conservation Area, is acceptable subject to the discharge of the landscape and ecology conditions attached to the OPP ref: 16/3025/MA, including condition 19 (open space/landscaping), condition 20 (landscape management strategy), condition 47 (traffic calming details including street trees), and condition 64 (landscape and ecological management plan).

#### *Ecology*

- 22.34 At a local level Policy OS4 of the Core Strategy requires that new development enhance the boroughs biodiversity and geodiversity. Policy OS(f) expands on the aspects that must be taken into account when assessing ecological factors, including the requirement for appropriate surveys to be undertaken.
- 22.35 As set out in the submitted Ecological Assessment prepared by Ecology Solutions (10995.EcoAs.vf2 dated July 2024). There are no non-statutory sites within or directly adjacent to the site boundary. The closest non-statutory site is River Thames and Tidal Tributaries SINC Site of Metropolitan Importance, which is located approximately 100m north of site. This is a large 2313ha site spanning across multiple London boroughs and supports a range of freshwater, estuarine and marine communities that are rare in London. It is an area of particular importance for birds, including provide feeding areas for Black Redstart. The closest SINC Site of Borough Importance (borough I) is Royal Docks, located approximately 920m north of site and the closest SINC Site of Borough Importance (borough II) is Plumstead Railway Cutting located approximately 390 southeast of site. The former site is important for its value to birds, including its use as a nesting habitat for Common Tern and a hunting area for Peregrine Falcon *Falco peregrinus* that nest nearby. The latter site contains areas of Sycamore *Acer pseudoplatanus* woodland, Bramble scrub and patches of Bracken that support a population of common birds and invertebrates. The closest SINC Site of Local Importance is St Mary Magdalene Churchyard located approximately 380m west of site. The site has numerous mature trees and walls that support locally scarce ferns including Common Polypody *Polypodium vulgare* and Maidenhair Spleenwort *Asplenium trichomanes*.

- 22.36 Ecology Solutions find that highly unlikely that any direct adverse impact will occur to these or any other non-statutory sites as a result of the development of the site. However, as the closest non-statutory site is 100m from the proposed development there is a risk of indirect impacts via pollution during construction. To ensure no adverse impacts arise from the proposed development, the Council's consultant ecologist, RPS, recommend a construction environment management plan be secured by condition and this recommendation has been adopted by officers.
- 22.37 In terms of onsite habitat, Ecology Solutions find that the habitats within the site consist of common and widespread species, with majority of the area consisting of hardstanding, modified grassland, and introduced shrub which are of limited nature conservation interest. The site was considered habitat for badgers. The site was not considered to provide opportunities for bat roosts or foraging. However, habitat improvements and sensitive lighting design were recommended. The Council's consultant RPS recommended a bat sensitive lighting condition be secured. This was not adopted as a bat friendly lighting condition, Condition 16 (Lighting), is already attached to Ref: 16/3025/MA. The site was not considered suitable for hedgehogs or any other protected mammals. Some opportunity for nesting birds were identified and suggested ecological improvements for nesting birds to be achieved through a Landscape Environmental Management Plan secured by condition. The Council's consultant ecologist supported these recommendation be secured by condition. Condition 64 attached to ref: 16/3025/MA already requires the submission of a landscape and ecology management plan for the Council's approval. Officers have amended Condition 64 to address the specific recommendation of Ecology Solutions.
- 22.38 Overall, subject to the recommended conditions of consent and existing conditions of consent attached to ref: 16/3025/MA, RPS have raised no objection to the proposed approach to ecology. Accordingly, Officers consider that the proposed development will be acceptable and compliant with Policies OS4 and OS(f) of the Core Strategy.

## 23. **Flood Risk**

- 23.1 NPPF chapter 14 states that where development is necessary in areas at risk of flooding the development should be made safe for its lifetime without increasing flood risk elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable), it can be demonstrated



that the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location, the development is appropriately flood resistant, it incorporates sustainable drainage systems, any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

- 23.2 London Plan Policy SI 12 states development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 23.4 Core Strategy Policy E2 states development must demonstrate consideration of all forms of flood risk by preparing FRAs in line with advice from the Environment Agency. Meanwhile, Policy E3 relates to flood risk reduction measures.
- 23.5 The site is in Flood Zone 1, an area with a low probability of flooding, and is located near the Thames which is categorised as Flood Zone 3.
- 23.6 The application is supported by Flood Risk Assessment and Drainage Strategy prepared by Herrington Consulting (dated March 2024) which has been reviewed by the Lead Local Flood Authority (LLFA) along with the submitted landscape plans.
- 23.7 The LLFA have advised that, overall, the LLFA do not object to the release of Condition 2 as it does not seek to amend or address any of the conditions attached to planning permission 16/3025/MA which relate to flood risk and drainage. Officers note that conditions 29, 54, 55, 56, 57, 59, 60, and 62 are attached to ref: 16/3025/MA and all pertain to flooding. On this basis of the LLFA's comment, and subject to the requirements to discharge the exiting conditions attached to Ref: 16/3025/F, officers consider the proposed development is acceptable in terms of flooding.

## 24. **Foul and Potable Water Infrastructure and Capacity**

- 24.1 It has already been established within the original application that the development would introduce new land uses on the site and will therefore result in an increase in foul water discharges to the public sewer network.

24.2 As such, condition 29 (Thames Water) was attached to the approval to ensure the development did not commence until a drainage strategy for that part of the development is submitted to the Local Planning Authority for approval in consultation with the sewerage undertaker and that no discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed. The current application is supported by a Foul Sewage and Utilities Assessment prepared by Buro Happold. Thames Water have reviewed this reserved matters submission and have advised that they have comments to make.

24.5 In light of the existing approval and the requirement to discharge condition 29, planning officers consider the approach to foul and potable water will be appropriately considered under the discharge of condition 29 attached to Ref: 16/3025/MA.

25. **Crime and Fire safety**

25.1 London Plan Policy D11 states Boroughs should work with their local Metropolitan Police Service in order to 'Design Out Crime' and maintain a safe and secure environment. Meanwhile, Policy D12 states all development proposals must achieve the highest standards of fire safety and that a fire safety assessment must be included with any future full application.

25.2 In regard to safety and crime prevention, the condition 18 (security) attached to Ref: 16/3025/MA which requires a Secured by Design Certificate be achieved within three months of the completion of the relevant phase of the development. This relates closely to condition recommended by the Designing Out Crime Officer (DOCO) above in section 7.3. Condition 18 attached to ref: 16/3025/MA will ensure the development proceeds in accordance the recommendations of the DOCO.

25.3 The application is supported by a Fire Statement prepared by BB7. The Planning Statement sets out that Plots D and K have been designed to meet emerging fire design requirements under the 2022 Building Safety Act and London Plan Policy D12, which requires the safety of all building users and for all development proposals to achieve the highest standards of fire safety, while further meeting London Plan Policy D5 requiring the provision an evacuation lift to facilitate dignified escape.

25.4 Further, the planning statement explains that the Proposed Development comprises of seven buildings (D1, D2, D3, D4, D5 and K3 K4 and K5) that are all above 18m in height. Two staircases and three lifts are included in each

building, with Building K3 K4 being provided with four lifts, to comply with the highest standard of fire safety. The third lift serving the secondary staircase is capable of being either firefighting or evacuation. Protected lobbies, which are all separately ventilated, are located by the lift and stair in each building. The communal corridors are also separately ventilated. Within the protected lobbies a wheelchair zone (1500x1500mm) and a refuge zone (1400x900mm) has been provided for, alongside the refuge communications required. A smoke shaft is also provided within each protected lobby.

- 25.5 HSE have been consulted and confirm that they welcome the provision of two separate stair cores in each building and that each stair core is designed as a firefighting core. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.

## **26. Equality Impacts**

- 26.1 Section 149 of the Equality Act 2010 (Public Sector Equality Duty ("PSED")) ("Equality Act") provides that in exercising its functions (which includes the functions exercised by the Council as Local Planning Authority), that the Council must have due regard to the need to-

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 26.2 The protected characteristics set out in Section 4 of the Equality Act are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties in section 149 may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Equality Act.

## **27. Community Infrastructure Levy (CIL)**

Mayoral 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 2012 and was revised in 2019.

27.2 The current application would be liable to this requirement for Mayoral CIL.

RBG CIL

27.3 The Royal Borough adopted Local Community Infrastructure Levy (CIL) charging schedules in 2014 and 2015.

27.4 The current application is liable to this requirement, or the charging schedule rates applicable at the time that the planning permission decision is issued, to the extent set out in the Community Infrastructure Levy Regulations 2010 (as amended).

## 28. **Legal Agreement**

28.1 Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a S106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are statutory tests.

28.2 The NPPF (paragraph 56) states that “*Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.*”

28.3 Core Strategy Policy IM1 seeks the use of planning obligations and other funding mechanisms to support the delivery of infrastructure facilities and services to meet needs generated by new development and mitigate the impacts. The Planning Obligations SPD (2015) provides further guidance on how the Council will secure planning obligations, where these are necessary to mitigate the impacts of development.

28.4 Pursuant to the considerations within the previous sections of this report, and in line with the policy context set out above, officers propose to secure the following planning obligations to appropriately mitigate the impact of this development.

### ***Affordable Housing***

- A detailed review of the housing occupation trigger for private units in clause 9.2 of the current S106 Agreement (as amended to date) to ensure restriction are in place to prevent an appropriate level of private units until 928 Affordable Housing Units specified in the current S106 Agreement have been delivered (such restrictions not to be less than the current ones), or amendments to secure this if relevant in the Director of Regeneration, Enterprise & Skills' opinion

### ***Transport***

- Requirement to enter into an agreement pursuant to s38/s278 of the Highways Act 1980 (as amended) to improve pedestrian realm to the north of Block K
- Submission of a Stage 1 Road Safety Audit for loading bay adjacent to Block D and pedestrian crossing of New Warren Lane with redesign of roading and public realm plans to be submitted to and agreed in writing by the Council, and a Stage 2 Road Safety Audit if necessary.
- Requirement to enter into an agreement pursuant to s38/s278 of the Highways Act 1980 (as amended) for realignment of Beresford Street and the junction of Beresford Street and New Warren Lane
- A Prior to commencement of above ground works, a financial contribution of £127,296 towards local cycle improvements to be paid to the Council

### ***Sustainability***

- A carbon off-setting payment of £989,000, in order to mitigate against the shortfall in on-site CO2 reduction, or another contribution based on an improved achieve emissions rate as assessed against Building Regulations Part L 2021 (using SAP10.2 emission factors) at a rate of £95 per tonne over a period of 30 year period to achieve zero-carbon emissions
- Obligations to secure compliance with the carbon reductions, including monitoring of the renewable/low-carbon energy systems and to allow for the payment of a further Carbon Offset contribution to mitigate any shortfall that may occur, and amendments as necessary to existing sustainability and energy requirements

### ***Other Obligations***

- Payment of S106 monitoring costs associated with these additional obligations.
- Payment of legal costs

## 29. **Implications for Disadvantaged Groups**

29.1 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:

- The securing of an inclusive environment for prospective residents including seventy-one (71) of the homes to be designed to meet building regulation requirement M4 (3) for wheelchair users.
- Access to and within the development for persons with physical disabilities, including through priority needs parking spaces and accessible cycle parking.
- Public realm improvements within and surrounding the site which link to the wider outline consents

## 30. **Conclusion**

30.1 Overall the proposals are considered to be acceptable and in general accordance with the extant planning permission (16/3025/MA as amended by 18/0650/NM, 18/1202/NM and 24/0887/R).

30.2 As set out in the submitted Planning Statement, in summary, the applicant considered the proposed development provides the following benefits:

- On-site delivery of 663 high quality new homes on brownfield land, in a highly sustainable location, contributing to housing delivery in RBG;
- Enabling delivery of affordable homes with a broad and appropriate housing mix, range of sizes and types to create a mixed and balanced new community;
- Increasing in the number of dual aspect homes compared to the outline planning permission;
- Integrating modern home design within the surrounding area and historic context.
- Improving the setting of the Grade I listed Brass Foundry and Grade II Laboratory Pavilion West through design of the buildings;
- Delivery of the new permanent Maribor park to replace the temporary car park, temporary refuse store and temporary park;
- Providing a Biodiversity Net Gain of 62% in habitat units, providing a much improved situation on the current baseline and Greening' the Site, with an UGF of 0.4;
- New publicly accessible play spaces for all ages, enhanced landscaping, public realm improvements;

- Delivery of energy efficient homes that are part of the future decarbonisation of the Royal Arsenal Riverside heat network;
- Reduction in car parking provision in favour of cycle parking provision; and
- Employment through construction jobs and 959.1sqm non-residential space to provide creation of permanent on-site job opportunities.

- 30.3 Officers broadly accept the benefits cited above, although it is noted that achieving a UGF and delivering an appropriate quantum of playspace are requirement of the London Plan (2021). Whilst no harm to the setting of the Listed Buildings is identified, it is not necessarily agreed that the proposals will improve their settings though it is the case that the proposals will make improvements from the massing approved under the outline planning permission. Further, as noted above, an offset payment for carbon emissions reduction and cycle infrastructure upgrades have been secured to ensure the proposal will achieve zero carbon emissions and to ensure an increased demand for active travel infrastructure associated with the reduction in car parking is appropriately mitigated.
- 30.4 Overall, while some concerns were raised with the design of Blocks K3-4 and Block D3, the Urban Design and Conservation officers consider the development largely is acceptable in conservation and design terms. Planning Officers have considered the concerns raised by the Urban Design Officer and have concluded the proposed design is acceptable as set out in section 13 of this report.
- 30.5 The majority of transportation concerns have been resolved through the recommended heads of terms and conditions as discussed in section 21 of this report. The Highways Officer has raised concern as the southern most balconies in Block K oversail the adopted public highway and as the corner of the building at New Warren Lane partially sits on and over existing adopted highway, due to the arrangement of the chamfered lower ground floor. Generally, the Highways Officer advised that the Highway Authority do not support balconies oversailing the public highway in order that users of a public highway are not endangered as a result of a building oversailing the public footway. If the Planning Board approves the application, the developer will after the grant of the reserved matters approval need to obtain a highways oversailing licence from the Council's highway authority under the Highways Act 1980. The developer will also have to apply for and obtain a stopping up order to be able to construct Block K in respect of the corner of the building at New Warren Lane partially sits on existing adopted highway. The usual

process for applying for this type of stopping up order is under S247 of the Town and Country Planning Act 1990. The licence and stopping up order will need to be obtained before the relevant parts of the development are carried out. However, the Council's Planning Board has to consider the highways and other implications and impacts of these aspects of the proposal in considering this application.

- 30.6 Planning Officers note that, notwithstanding the associated s96A amendment, the boundaries of Blocks K3-4 with Beresford Street and New Warren Lane remains consistent with the approved outline parameter plans and accordingly this arrangement is understood to already benefit from outline planning permission. While this does not resolve the comments of the Highways Officer, Planning Officers consider this is a material consideration of determining this reserved matters application, alongside the concerns of the Council's highways department, which the Planning Board should consider. Accordingly, in light of the principle of this arrangement being approved under the OPP and revised OPP and whilst noting the concerns of the Council's highway officer, Planning Officers do not object to layout of Blocks K3-4 in relation to the public highway. Overall, subject to the details provided and the secured conditions and heads of terms, planning officers raise no objections to the proposed access and layout arrangements.
- 30.7 The application is supported by an Environmental Compliance Review (ECR) to demonstrate compliance with the Environmental Statement approved under the outline planning permission and Environmental Statement Addendum approved under the revised outline planning permission. An independent review of the ECR concludes that there is sufficient information to understand the environmental effects of the scheme.
- 30.8 Turning to the tilted balance, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Framework also makes it clear that the planning system should be genuinely plan-led.
- 30.9 Considering the tilted balance, the Council's 2.46-year supply of deliverable housing sites represents a significant shortfall, and the relevant policies for the supply of housing should be considered as out-of-date according to paragraph 11(d) of the Framework. The 'tilted balance' is therefore triggered, and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.



- 30.10 The adverse effects of the proposed development do not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework. The proposal complies with the development plan, and there are no other material considerations that indicate a decision other than in accordance with it.
- 30.11 On balance, and subject to the mitigation secured (financial and nonfinancial), the proposals are considered to be in accordance with the outline planning permission and the development plan. Accordingly, it is considered that the benefits of the development would outweigh the harm, and with the 'tilted balance' now engaged the balance is in further in favour of granting approval of the reserved matters secured under condition 2 attached to Ref: 16/3025/MA.
- 30.12 Accordingly, it is recommended that Members authorise officers to grant approval for the Reserved Matters for Access, external appearance of the buildings, design of the buildings, landscaping, and siting of the buildings pursuant to Condition 2 of Outline Planning Permission 16/3025/MA dated 17 March 2017, for Blocks D (D1, D2, D3, D4, and D5) and Blocks K3, K4, and K5 comprising 663 residential units (Use Class C3), 959.1sqm of retail unit (Class E / F1 / F2) along with public / private landscaping details, car / cycle parking, refuse / recycling facilities and play provision.

#### Background Papers:

National Planning Policy Framework (2023)  
The London Plan (2021)  
Royal Greenwich Local Plan; Core Strategy with Detailed Policies (2014)  
Planning Application for 13/0117/0  
Planning Application for 16/3025/MA  
Planning Application for 14/0604/R  
Planning Application for 14/1223/F  
Planning Application for 15/0596/R  
Planning Application for 15/1036/NM  
Planning Application for 16/3024/R  
Planning Application for 18/0342/NM  
Planning Application for 18/4008/NM  
Planning Application for 18/1622/R  
Planning Application for 18/0650/NM  
Planning Application for 18/1202/NM  
Planning Application for 19/3373/F  
Planning Application for 19/4077/R  
Planning Application for 22/3206/NM  
Planning Application for 23/1610/NM  
Submission for 23/3844/EIA  
Planning Application for 24/0848/R

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APPENDED