

My Ref: DGR/RIVERSIDE  
Your Ref:

26 July 2021

Planning Department  
Royal Borough of Greenwich  
The Woolwich Centre  
35 Wellington Street  
London  
SE18 6HQ

***Via the Planning Portal***

Dear Madam/Sir

**RIVERSIDE HOUSE (EAST AND WEST), WOOLWICH HIGH STREET, WOOLWICH, SE18 6BU – APPLICATION AS TO WHETHER PRIOR APPROVAL IS REQUIRED FOR CHANGE OF USE FROM OFFICES TO RESIDENTIAL USE**

Please find enclosed with reference to Class O and Paragraph W of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), an application as to whether prior approval is required for the change of use of the above from offices to flats.

**Context to the Application**

Class O of the Order sets out that permitted development is development consisting of a change of use of a building (including part of a building) and any land within its curtilage from a use falling within Class B1(a) (offices) of to a use falling within Class C3 (dwellinghouses) of that Schedule.

With reference to Class O of the Order, I can advise that the building is neither listed, nor a Scheduled Ancient Monument. It is also not located within a safety hazard area or a military explosives storage area. No external alterations to the building are proposed as part of these applications.

**Proposed Development**

The application proposes the following:

*Change of use from B1a offices to 209 residential units (74 x 1 bedroom/1 person, 60 x 1 bedroom/2 person and 75 x 2 bedroom/3 person).*

The following has been submitted via the Planning Portal:

- Application Form
- CIL Form
- Application Drawings (Osel Architecture) comprising
  - Location Plan and Site Plan
  - Existing Floor and Roof Plans
  - Existing Elevations
  - Proposed Floor and Roof Plans
  - Indicative Proposed Elevations – note these are not intended for consideration as part of this prior approval application but illustrate the type of external works which could come forward during the course of converting the building to flats. Any proposals would be the subject of a separate application for full planning permission.
- Flood Risk Assessment (Markides Associates)
- Internal Daylight and Sunlight Report (GIA)
- Phase I Environmental Report (Enzygo)
- Transport Note (Transport Statement)

As illustrated on the proposed floor plans, all the flats have been designed to accord with the Government's Technical Housing Standards.

### **Planning Considerations**

As set out within the GPDO, the relevant matters for consideration when determining this application are transport and highways impact; contamination risk; flood risk; the impact of noise from commercial premises on future occupiers; and the provision of adequate natural light in all habitable rooms of the dwellinghouses.

#### Transport and Highways Impact

The application is supported by a Transport Statement (TS). The TS notes that the site is located within the wider Woolwich Town Centre regeneration area and benefits from excellent accessibility by public transport and by foot (PTAL of 6a). From Woolwich Arsenal railway station (approximately 550 metres from the site), there are DLR, Southeastern and Thameslink services and Woolwich Crossrail station is also due to open in 2022. There are bus stops within 200 metres of the site with access to daytime, nighttime and weekend services. Shops, education and health services are all within convenient walking distance.

In accordance with London Plan standards are 314 bicycle spaces proposed for future residents. These are provided within covered and secure stores at ground floor level and it is considered that further

details are capable of being secured via a planning condition. 5 short term spaces would be provided for visitors, again, in accordance with standards.

Given the site's location, it is proposed that the development will be car free with the exception of 21 on-site disabled spaces and it is confirmed that the developer would enter into a scheme to ensure that future residents (other than blue badge holders) are not eligible for permits within the controlled parking zone. The 21 spaces for Blue Badge Holders have been shown on the proposed ground floor plan.

Delivery and servicing vehicle movements, including refuse collection, will reflect the existing arrangement, with vehicles accessing dedicated bin storage areas to the rear of the site, via Bunton Street. Swept path analysis has been undertaken and included with TS.

Trip generation analysis has been undertaken using the TRICS database and the TS summarises that the proposed change of use represents a betterment in terms of impact on the local highway network during peak hours and is not anticipated to result in any material change in character of trips across the local transport network.

The TS concludes that there are no transport related reasons why the proposed change of use requires prior approval.

#### Contamination

The application is supported by a Phase 1 Environmental Report. The report concludes no significant contamination sources has been identified. Based on the above, is considered that no further investigation works are necessary. It is confirmed that if unforeseen contamination is encountered during construction, an environmental consultant will be available on a 'call out' basis to undertake an assessment of risk.

It has therefore been demonstrated that there are no contamination grounds for refusing the change of use to residential accommodation.

#### Flood Risk

The applications are supported by a Flood Risk Assessment (FRA). The FRA notes the site is not shown to be at risk of fluvial flooding given that it is located in Flood Zone 1 (Lowest flood risk category) according to the Environment Agency's flood maps for planning.

The FRA further sets out that the risk of surface water flooding is low site and that the site is not located within a Critical Drainage Area.

The FRA concludes that the proposals are consistent with the aims of the NPPF and the Local Flood Risk Management Strategy. The site can be developed without increasing the risk of flooding on site or elsewhere, and the proposed units will not be at an unacceptable risk of flooding from rivers, surface water, groundwater, sewers, or artificial sources.

On the basis of the above and as detailed within the FRA, flood risk impact should not constitute a reason for refusing the applications. This is consistent with officer's assessment of the previous application.

#### Noise Impact

The application is supported by an Environmental Noise Survey and Acoustic Design Statement Report. The report highlights that the impact from commercial premises is low (including plant) and further concludes that the site is suitable for residential use.

It is therefore considered that there are no grounds for refusing the proposed change of use on the account of noise impact from commercial premises.

#### Natural Light

Internal daylight and sunlight analysis has been carried out in accordance with the methodologies contained in the Building Research Establishment's Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2011). The report concludes that the scheme will be well daylit as 100% of habitable rooms analysed achieve the ADF target value for their room use. The consultants further conclude that the sunlight test results are excellent for an urban location.

Accordingly, it has been demonstrated that all habitable rooms would have adequate natural light.

#### **Summary**

The proposal entails the change of use of existing office floorspace to C3 residential use. As has been demonstrated above, in my view, it would not give rise to impacts which would require an application for planning permission.

I look forward to your consideration of these applications. If you have any queries in relation to the property or proposal, please do not hesitate to contact me as agent on behalf of the applicant on DD 020 8248 3500 or via email to [daniel@droseplanning.com](mailto:daniel@droseplanning.com).

Yours faithfully

**Daniel Rose MTCP (Hons) MRTPI**  
**Partner**  
**D. ROSE PLANNING LLP**  
**For and on Behalf of Marson Property Limited**

Enc.