

Planning Statement

Mixed Use Development

Enderby Place, Greenwich Peninsula

December 2023

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1. Introduction

- 1.1. This Planning Statement is prepared on behalf of Maritime View Ltd for the proposed redevelopment of Enderby Place, Telcon Way, Greenwich, SE10 0AG within the Royal Borough of Greenwich.
- 1.2. The development proposals comprise the erection of buildings of up to 35 storeys to provide a mixed-use development of 564 residential apartments, 1,455m² GIA of non-residential floorspace, associated vehicular access, car parking and servicing facilities, landscaping, public realm and play spaces.

Site and Surroundings

- 1.3. The Site measures approximately 1.24 hectares in size and is located on the west side of the Greenwich Peninsula, approximately halfway between the O2 Arena and Greenwich Town Centre / Royal Naval College. It is within the Greenwich Peninsula Opportunity Area.
- 1.4. Enderby Place formed part of the wider Enderby Wharf redevelopment site and is the remaining undeveloped northern part. Planning permission was originally granted in 2010 for the whole Enderby Wharf site, including the northern part that is now subject to this application. The southern part, which now adjoins the Application Site, was implemented by Barratt London and provides circa 616 residential apartments across six buildings up to 13 storeys. This was completed and occupied by 2016.
- 1.5. The site fronts onto the River Thames to the west and the Thames Path runs along the western boundary separated by temporary hoardings that have been in place for a number of years. To the east the site adjoins a retained light industrial unit that is part of Morden Wharf wider site, with a residential development known as Telegraph Works adjoining to the south-east off Telecon Way. This comprises 272 apartments across 4 buildings up to 18 storeys, that was formerly part of the Alcatel-Lucent facility. The remaining operational part of Alcatel is beyond to the east with a frontage onto the Blackwall Lane.
- 1.6. Directly north of the site are various industrial premises at Morden Wharf which includes the Tunnel Glucose Safeguarded Wharf. Planning permission was recently granted for a comprehensive mixed-use redevelopment of Morden Wharf, including up to 1500 residential units and 17,311m² of commercial floorspace with buildings up to 36 storeys.
- 1.7. Further to the south beyond Enderby Wharf is further residential development at Lovells Wharf.
- 1.8. The site is not located within a conservation area and does not contain any designated heritage assets although the red line boundary encompasses land surrounding the Grade II Listed Enderby House, although the property itself is not within the red line.
- 1.9. In terms of Local Plan Policies Map designations, the following affects the site:

RBG Core Strategy:

- Strategic Development Location
- Thames Policy Area
- Flood Risk Area (Zone 3 High, but benefits form Flood Defences)
- Adjoins a Grade II Listed building
- Adjoins Strategic Industry Location
- Adjoins a Site of Nature Conservation Importance (River Thames)
- Adjoins a Riverside Walk (New Improved)

London Plan (2021)

- Greenwich Peninsula Opportunity Area

Planning History

- 1.10. There are numerous development sites and associated planning and other applications that are relevant to the Application Site. There is also a significant body of applications relating to Enderby Wharf (the wider site) and Enderby Place (the Application Site, that forms the northern part of the wider site).
- 1.11. The table below is not exhaustive but contains the applications considered most relevant across Enderby Wharf and Enderby Place, and as the three closest adjoining neighbouring sites - Telegraph Works, Lovells, Granite, Badcocks and Pipers Wharf and Morden Wharf.

Table 1: Relevant Planning History

Reference	Description of Development	Date Registered	Decision
ENDERBY WHARF			
10/3063/F	Redevelopment of the site comprising the provision of a new jetty in the River Thames to provide docking for cruise liners and the Thames Clipper, a Cruise Liner Terminal, a 251 room hotel with conference, restaurant ancillary facilities (Use Class C1); skills academy (Use Class D1); 770 residential units (Use Class C3); commercial (Use Class B1); a crèche (Use Class D1) a gymnasium (Use Class D2); conversion and extension of Enderby House to	09/11/2010	Granted with Legal Agreement 27/01/2011

	provide tourist, community and retail facilities (Use Classes A1, A3, A4, B1, D1 and D2); the provision of vehicular access with associated servicing facilities; car, motorcycle and bicycle parking, provision of landscaping and public realm (including improvements to the Thames Walk); improvements to the river wall and other works within the river, including dredging, the provision of tidal gardens, piling, the provision of a pontoon and brow, and associated works.		
13/3025/MA	First s.73 application. Same description as above – allowed alterations to the unit mix / tenures across various blocks in the development.	18/11/2013	Approved 22/08/2014
14/3638/NM	Non-Material Amendment under section 96a to planning permission dated 22.08.14 (ref: 13/3025/MA) for alterations/reconfiguration to offshore pontoon, linkspan and brow and associated passenger transit structures.	15/12/2014	Approved 11/03/2015
14/3080/SD	Submission of details pursuant to condition 7 (Phasing) of planning permission dated 22/08/14 (Ref:13/3025/MA). <i>This application confirmed that the Hotel and Block A (within the northern part of the Site, now the subject of this application) and Block B (within the southern portion of the Site) would be delivered in Phase 2. The Cruise Terminal was also within the northern part of the Site but proposed to be included in Phase 1.</i>	24/10/2014	Approved 07/05/2015
15/1439/MA	Second 73 Application: Allowed for the removal of the second level of basement from the southern part of the site, reducing residential car parking spaces from 447 to 328.	18/06/2015	Approved 19/02/2017

	(Maximum building height 16 storeys)		
ENDERBY PLACE			
15/0973/F	<p>Revised application for the northern element of the Enderby Wharf Development comprising the erection of a cruise liner terminal building, skills academy (Use Class D1), 477 residential units (increasing from 93) (Use Class C3), retail, restaurants and cafes and drinking establishments (Use Classes A1, A3 and A4), vehicular access with associated servicing facilities, car parking, landscaping, public realm (including improvements to the Thames Path), play spaces, infrastructure and associated parking.</p> <p><i>This decision was challenged through Judicial Review on grounds of air quality / emissions and harm to health but was rejected by the High Court Judge.</i></p>	30/03/2015	Granted with Legal Agreement 23/12/2015
<i>Various applications to discharge pre-commencement conditions and obligations were approved during 2016-2018</i>			
16/1395/SD	<p>Submission of details pursuant to condition 8 (Phasing Plan) of planning permission dated 23/12/15 (Ref:15/0973/F).</p> <p><i>This application confirmed that the Cruise Liner Terminal would be delivered as Phase 1, with three residential blocks delivered subsequently as Phases 2, 3 and 4.</i></p>	06/05/2016	Approved 27/11/2017
17/0436/V	Request for a Deed of Variation to the S106 Agreement dated 22nd August 2014 in relation to Planning Permission Ref: 13/3025/MA to modify Appendix 2 (Phasing) to include Block B, located on the southern part of the site, within Phase 1 of the development.	07/02/2017	Withdrawn 27/02/2019

	<i>This application sought to align the Phasing Plans between the consents for Enderby Wharf and Enderby Place (the northern part) to allow for Block B to be brought forward. This was required due to the hiatus caused by the Judicial Review noted above in relation to Enderby Place (15/0973/F).</i>		
20/3133/EIA	Environmental Impact Assessment Scoping Opinion under Regulation 15 of the Town and Country Planning (EIA) Regulations 2017 (as amended for the redevelopment of Enderby Place to provide up to 750 residential together with approximately 1,900 sqm commercial space (including office, employment, restaurant and cafe uses)	07/10/2020	Scoping Opinion issued 27/11/2020
21/1956/CE	Certificate of Lawfulness (Existing) for the confirmation of lawful implementation of permission 15/0973/F, dated 23rd December 2015 for: Revised application for the northern element of the Enderby Wharf Development comprising the erection of a cruise liner terminal building, skills academy (Use Class D1), 477 residential units (increasing from 93) (Use Class C3), retail, restaurants and cafes and drinking establishments (Use Classes A1, A3 and A4), vehicular access with associated servicing facilities, car parking, landscaping, public realm (including improvements to the Thames Path), play spaces, infrastructure and associated parking.	27/05/2021	Certificate Granted 19/11/2021
LOVELLS, GRANITE, BADCOCKS AND PIPERS WHARF			
06/1749/F	Redevelopment for mixed-use comprising offices, studio workshops, hotel, 667 residential units, retail, restaurant/ cafe/bar, boatyard/club, ecological centre, medical health centre, health club, creche, new open spaces, tidal garden, sports areas, play area, river slipway, parking	17/07/2006	Granted with Legal Agreement 20/02/2007

	742 cars, vehicular access arrangements, cycle/pedestrian routes/landscaping. (Maximum building height 10 storeys)		
11/2959/V	First S73 Application: Same description as above. This allowed for various changes to the footprint, height, residential layout and location of uses within the development.	29/11/2011	Approved 30/03/2012
12/2465/MA	Second S73 Application: Same description as above with amended residential units to 680 and altered unit mix.	08/10/2012	Granted with Legal Agreement 31/07/2013
TELEGRAPH WORKS			
14/0293/F	Reconfiguration of the existing Alcatel-Lucent Greenwich factory including partial demolition, extensions, internal and external alterations, construction of a new energy centre and 272 residential units, play spaces, associated landscaping, access, car parking and infrastructure works. (Maximum building height 18 storeys)	31/01/2014	Granted with Legal Agreement 16/10/2014
MORDERN WHARF			
20/1730/O	Hybrid planning application comprising outline planning permission with all matters reserved (43,475 sqm site area) and full planning permission (12,992 sqm site area). Outline permission is for the demolition of existing on-site buildings and structures (except the Southern Warehouse) and phased mixed-use redevelopment comprising: up to 1,500 residential dwellings; up to 17,311 (sqm GIA) of commercial floorspace (Class A1/A2/A3/A4/B1/B1c/ B2/B8/D1/D2); and associated car and cycle parking, public realm and open space, hard and soft landscaping, highway and transport works, and associated ancillary works. Full planning permission is for the change of use of part of the Southern	16/06/2020	Granted with Legal Agreement 27/06/2022

	Warehouse from Class B1c/B2/B8 to B1c/B2/B8/A3/A4; refurbishment (including mezzanines) and external alterations to part of the Southern Warehouse; change of use of the Jetty to public realm and installation on the Jetty of Gloriana Boathouse (use class D1/D2); access; landscaping and public realm works including new river wall and upgraded Thames Path.		
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Pre-Application

- 1.12. The Applicant, Maritime View Ltd took ownership of the Site in July 2019. Since then a total of five pre-applications have been held with RBG Council, two with the Greater London Authority (GLA) and one with Transport for London (TfL) with on-going dialogue. The proposals have also been scrutinised by the Design Review Panel on two occasions. A summary of the responses received at each stage is provided below. The comprehensive and lengthy engagement process has helped to shape the final proposals the subject of this application.

RBG Pre App 1 - October / November 2019

- 1.13. LAND USE: The site previously fell within Strategic Industrial Land (SIL) and its release from SIL was only considered acceptable in relation to the 2010 permission (Enderby Wharf) and 2015 permission (Enderby Place) due to the provision of the cruise liner terminal and mixed-use development providing employment opportunities. This was an exceptional circumstance. The Apart-hotel was questioned, both in terms of its use and location (as a main town centre use) and the quantum of rooms proposed that was significantly greater than the earlier consented hotel (2015 permission). More information was requested on the Built-to-Rent units.
- 1.14. DENSITY: The increase in overall density (both residential units and apart-hotel) was questioned given the low PTAL and limited transport infrastructure locally.
- 1.15. DESIGN (Height / Massing & Heritage Impact): The rationale for further height increases over the 2015 consent was questioned. The argument that additional height is necessary to reach 35% affordable housing was questioned, given that the removal of the cruise liner terminal should have improved the viability position. Public benefit additionality compared to the 2015 consent was unclear. Height was previously justified to act as a 'marker' for the cruise liner terminal, which is no longer included. Standard of residential amenity and quality of apart-hotel units was criticised and questioned. Heritage impacts on numerous assets was raised as a potential issue.

- 1.16. UNIT TYPES (Mix & Affordable Housing): Provision of 35% affordable housing with a 70:30 tenure split in favour of social rent, was welcomed, although further information was requested on built-to-rent. Unit mix broadly welcomed, although concern was raised on the lack of two-beds and high proportion of studios.
- 1.17. OPEN SPACE / CONNECTIVITY: It is expected that any development needs to improve the accessibility and pedestrian experience for future residents connecting to Greenwich Town Centre to the south, east/west movement to the wider Peninsular and improvements to the Thames Path in conjunction with Morden Wharf. More information was requested on open / play space and amenity facilities within the development given poor connectivity to the Peninsula.
- 1.18. EMPLOYMENT PROVISION: The Council accept the release of the site from SIL given the existence of planning consents for mixed-use residential-led development in this location, although the justification for its original release (the provision of the cruise liner terminal) is highlighted as a notable circumstance. Any scheme should therefore include a meaningful employment offer.
- 1.19. TRANSPORT / PARKING: Whilst a car-free development is generally supported, the low PTAL of the site need to be factored in and consideration given to whether the PTAL could be increased through upgrades and contributions to existing infrastructure. It was also noted that the Greenwich Peninsular West Masterplan noted the introduction of local bus routes and a successor to the Greenwich Waterfront Transit, which should be discussed with TfL.

RBG Pre-App 2 – June / July 2020

- 1.20. PRINCIPLE: Mixed use redevelopment on a brownfield site in the OA is supported, and the removal of apart-hotel is welcomed. Alternative employment (e.g.: B1c) should be explored and uses to support residents (e.g.: nursery).
- 1.21. RESIDENTIAL UNITS: Concern raised with the uplift in units (793, an additional 316 compared to extant scheme), considering PTAL of 1b-2 and relatively poor pedestrian connectivity (and removal of River Jetty) and lack of access to jobs / services. Particularly high density is also leading to issues around height and residential quality. Further detail still required on B2R tenure with reference to LP Policy H11 (draft at the time) and affordable housing, although the intent to follow the Fast Track route (i.e.: 35%) was welcomed. Suggested that a large majority of the AH would be single aspect dwellings, which is not supported. The removal of studio units from the first pre-app is welcomed, although the mix still does not include sufficient accommodation for families, and most 2 beds are 2B3P which offers little flexibility.
- 1.22. AMENITY: High proportion of single aspects units (including those facing N) is a concern. Daylight impacts needs to be compared against the existing condition (baseline) and not just a comparison against the extant permission. High level analysis suggests that there would be moderate impacts to neighbouring units, and testing appears to have omitted overhanging balconies which does not provide true impacts. Microclimate report suggests that the development would create windier conditions, which

needs to be mitigated to ensure comfort for all. Further detail needed on noise impacts considering adjoining wharves and 'agent of change' principles. Balconies are the preferred option for amenity than winter gardens.

- 1.23. LANDSCAPING / OPEN SPACE: Need for high quality public realm in this location is important. Playspace requirements to do appear to be met based on 35% affordable housing being included. More information required on landscape strategy, including overshadowing analyses of ground floor areas and net gain in biodiversity. Reinstatement of the Jetty was strongly encouraged.
- 1.24. DESIGN / TOWNSCAPE / HERITAGE: Whilst tall buildings may be appropriate in this area, this needs to be considered in relation to Maritime Greenwich WHS and other heritage assets that may be impacted in views. At this stage harm does arise, which may be outweighed by public benefits. Highlighted that continuing justification does not exist for such tall buildings in this location that would outweigh the impacts. Whilst noted that extant scheme is a material consideration, the design should be informed by the existing context and take a design-led approach to suitable heights rather than rely on the extant consent.

RBG Pre-App 3 – August 2020

- 1.25. Prior to the 3rd meeting, further detail that had been developed by the applicant team was provided on matters of townscape and heritage visual impact, design, landscape, transport and consultation strategy. The minutes of the meeting recorded that RBG Officers continued to raise concerns around the justification for the building heights, impacts on heritage assets and townscape, unit mix and detail of the affordable housing products (i.e.: tenures and rent levels).

GLA Pre-App – October 2020

- 1.26. PRINCIPLE: Principle supported. A small slither of the site, primarily the access, appears to still be within SIL (Telecon Way). Need to ensure that any development does not compromise the operation of existing industrial premises / wharves ('agent of change' principles).
- 1.27. HOUSING: Built-to-rent tenure supported, subject to draft Policy H11. Expect there to be parity between the location of private / affordable dwellings and relationship with nearby industrial premises / wharves. Fast track route (35%) can be utilised. Advice given in terms of s.106 requirement for B2R tenure and review mechanisms and process if the viability tested route is to be followed.
- 1.28. DESIGN / HEIGHT / MASS / HERITAGE: Questioned whether a design-led approach has been followed sufficiently, or just amendments to the extant consent. With the removal of the CLT, the layout of blocks could create better spaces to ensure good daylighting and public realm. Colonnade proposal questioned, impacts legibility of River Park. No particular concerns raised with height, although some suggestions made on individual block massing. General advice given on residential quality expectations.

- 1.29. TRANSPORT: Improvements to the site's accessibility via sustainable and active travel modes are required to support the quantum of development coming forward. Provision of a bus service to pass through Christchurch Way or Telegraph Avenue is necessary. The provision of a river bus pier should also be explored. The development should consider and contribute to improvements to the walking / cycling network outside the site. Car-free development welcomed (except Blue Badge) and 3% would cater for the estimated 2.3% of Greenwich residents that hold 'blue badges'.
- 1.30. RESIDENTIAL QUALITY / FIRE SAFETY / PLAYSPACE INCLUSIVE ACCESS / ENERGY AND ENVIRONMENTAL IMPACTS: General policy expectations set out for any future planning application on these matters.

RBG Pre-App 4 – February 2022

- 1.31. Noted by RBG that since the earlier pre-app, a number of large residential schemes have been consented (such as Telegraph Works, Greenwich Peninsula Masterplan, Millennium Village, Morden Wharf), and the London Plan 2021 was adopted. Noted by officers that the number of residential units had been reduced (from 739, to circa 600-700) as well as the commercial floorspace (from 1890 sqm to 1400 sqm), with the removal of retail floorspace.
- 1.32. PRINCIPLE: The precedent set by the grant of permission at Morden Wharf means that despite the low PTAL a high-density proposal may be acceptable. The historic use of the Site as SIL, despite the 2010 and 2015 permission, still requires consideration as the previous justification (CLT) is no longer included, unless the Draft Site Allocations DPD has more weight. However, it was also acknowledged that given the implementation of a non-industrial permission and that most of the site has been released from SIL, it was recognised that most of the site cannot be classed as industrial anymore (also referred to CS Policy EA(a) relating to local industrial sites, does not apply to the Strategic Development Location). Need to ensure appropriate relationships can co-exist between residential and any existing nearby industrial uses. Class B use broadly supported, subject to further detail.
- 1.33. UNIT MIX AND QUALITY: Request for the unit mix to include more family units (16% at the time, which was consistent with Morden Wharf). Concern raised over number of single aspect units and over-articulated layout of dual aspect units within Morden Tower and Telecon Tower. Open space between the towers is more generous than earlier design and welcomed, although more detail required on access and connections.
- 1.34. DESIGN: Proposed arrangement of blocks was broadly welcomed, although some concern was raised over River Tower and engagement and proximity with G2 Listed Enderby House. With regards massing, the proposals would contribute to a coherent cluster of tall buildings with Morden Wharf in views across the river. A commercial street facing the retained ha-ha wall was welcomed although more information requested on unit types, night-time safety and undercroft access from Telecon Way. Coalescence identified between Morden Tower and neighbouring tower at Morden Wharf in certain views, which would also cause overshadowing of neighbouring blocks and wind channelling effects.

- 1.35. HERITAGE: Study area needs to be confirmed and agreed with officers. Although it is noted that with the building set back from the river, they are likely to be largely obscured by Morden Wharf and Enderby Wharf, although further views are required, for example from Olympian Way. Concerns with the proximity of the block closest to Enderby House, although the setback is noted to give the latter prominence with the podium height to match, which was welcomed.
- 1.36. NEIGHBOURING AMENITY: Concern raised over potential overshadowing of some of the blocks within the Morden Wharf development.
- 1.37. TRANSPORT: Further justification / detail required on the proportion of Blue Badge' parking, noting that 3% is proposed, and it is unclear if / how this could be increased to 10%. Recommended to explore the option of extending the potential bus route proposed as part of the Morden Wharf development, through this site and Telecon Way. Alternative option is to collaborate with Morden Wharf site owner to facilitate passenger river boat service. Cycle recommendations given.
- 1.38. ENVIRONMENTAL: Further detail required in relation to flood risk, contaminated land, energy and climate change.

RBG Pre-App 5 – July / August 2022

- 1.39. Officers noted the further amendments to the scheme, namely the reduced unit numbers to 594 and increased commercial floorspace to 1515m², and proposal to include 35% affordable split 71% low-cost rent and 29% intermediate. Comments regarding lack of family housing maintained as before.
- 1.40. DESIGN AND HERITAGE: The access from Telcon Way still requires improvement. Access to the proposed car park from Christchurch Way looks unpractical. Internal layout of proposed car park with bike store should be revised and consider the additional area at the interface with Salutation Road industrial site. Approach of one large bike store not supported. Layout of super ha-ha needs further exploration to avoid it becoming dark, outdoor storage area. Servicing of commercial units also needs explanation. Further clarity required on access for the maisonettes to parking spaces, step-free secondary access and interface of private gardens with the Residents Garden. Height of the tallest building appears too similar in height to tallest building at Morden Wharf in most of the supplied views, with detrimental impact on the form of the cluster. Proposals should legibly step down towards the southern end. The sub-division of the buildings in distinct slender elements to break down their bulk is supported. Proposed architectural ideas for the facades are promising.
- 1.41. RESIDENTIAL AMENITY: Further efficiencies could be achieved on the internal layouts around the core and AOV area, and large family units should have a second bathroom. Need to consider new BRE Guidance of daylight / sunlight amenity. Concern remains over the negative impact in daylight / sunlight terms on neighbouring blocks T04 and B07, the latter would suffer excessive overshadowing and sense of enclosure.

- 1.42. OPEN SPACE / PLAY: The location and concept for the open spaces is understood, although further clarification is required of the role of each space and accessibility for residents. Garden Approach, Telegraph Ave and Enderby Yard should be useable public realm. Concern raised over apparent inadequate play space provision.
- 1.43. HERITAGE: Earlier requests for clarity have been provided in relation to study area and the ZTV, views from the south along Olympian Way and relationship with Enderby House. Confirmed that based on the submission up to this stage, the proposals are unlikely to generate any greater impact on Enderby House, with some beneficial impacts.
- 1.44. SOCIAL INFRASTRUCTURE: Further consideration needed on the cumulative impacts on social infrastructure locally to support the housing numbers proposed (e.g.: health and education).
- 1.45. TRANSPORT: Further justification is required on why the bus route option has been discounted. Improvements to public transport to support the development is crucial. Further detail still required on bicycle parking types and locations, disabled parking numbers and management going forward, and what collaboration has taken place with adjoining site over Thames Clipper.

TfL Pre-apps – 2022 & 2023

- 1.46. Various meetings were held with TfL between Autumn 2022 and Summer 2023, primarily to discuss the prospect of delivering a bus route through the site, to connect the proposed Morden Wharf loop to Christchurch Way. The Applicant team presented a solution to improve local bus connectivity utilising the existing road network in late 2022, and in Spring 2023 explained why a bus route through the site would have significant negative effects on scheme viability (and thus affordable housing), and placemaking. At the point of submitting this planning application, RBG Council and TfL have not provided any formal response to the Applicant's information.

2. Decision Making Framework

- 2.1. This section articulates the decision-making framework for the proposal.
- 2.2. Planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise¹.

Development Plan

- 2.3. The Development Plan is comprised of:
- The London Plan (March 2021)
 - The Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014)

Material Considerations

- 2.4. A revised NPPF was published (September 2023) and is an important material consideration in decision making, particularly with regard to land use optimisation.
- 2.5. The NPPF also explains that “*Local planning authorities may give weight to relevant policies in emerging plans according to:*
- “*The stage of preparation of the emerging plan...*
 - “*The extent to which there are unresolved objections to relevant policies....and;*
 - “*The degree of consistency of the relevant policies in the emerging plan to this Framework*”².
- 2.6. When weight is given to these emerging policies, they are material considerations.
- 2.7. The Council were progressing a Site Allocations Local Plan which reached Regulation 19 stage. The public consultation for that document was due to take place in 2020 but was delayed due to the Covid-19 pandemic. As a result and following a review of the Core Strategy with Detailed Policies and the emerging Site Allocations Local Plan, the Council decided that a comprehensive overhaul of the planning policy framework was needed, with both elements to be subsumed into a new Local Plan.
- 2.8. A Regulation 18 consultation for the Draft Emerging Greenwich Local Plan was carried out during July and September 2023. At this early stage, there are no draft policies, so the document carries no weight.

¹ S38(6) Planning and Compulsory Purchase Act 2004

² NPPF Paragraph 48

2.9. The Greater London Authority (GLA) and RB Greenwich have several additional documents which are material considerations relevant to this application:

- RBG Greenwich Peninsula West Masterplan
- RBG Planning Obligations SPD
- RBG Urban Design Guide
- GLA Affordable Housing and Viability Supplementary Planning Guidance (SPG) (August 2017)
- GLA Housing SPG (March 2016)
- GLA Play and Informal Recreation SPG (September 2012)

Built Heritage Framework

2.10. The site is within the setting of built heritage assets, including but not limited to:

- Enderby House (Grade II Listed) which the red line boundary circumnavigates.
- East Greenwich Conservation Area
- Old Royal Naval College
- Maritime Greenwich WHS.
- Greenwich Park (Grade II* Listed on the Register of Parks and Gardens of Special Historic Interest)
- Assessment Point 5A.1 Greenwich Park over the Queen's House, National Maritime Museum and Old Royal Naval College within the London View Management Framework.

2.11. Therefore Section 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also applies to this proposal, which states *"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*.

2.12. The following case law is particularly instructive where planning decisions are to be made in the context of heritage assets. The *Forge Field* Judgment³ explains the proper application of the above statutory

³ R (on the application of) Forge Field Society & Others v Sevenoaks DC & Interested Parties [2014] EWHC 1895 (Admin)

test, and their interplay with the Section 38(6) statutory test. Secondly, the *Forest of Dean* Judgment⁴ confirms the correct approach when applying Paragraph 11(d) of the NPPF⁵.

Tilted Balance

- 2.13. Recent appeal decisions, with the benefit of common ground positions, have established that the borough lacks a five year housing land supply, and consequently paragraph 11d of the NPPF is relevant, rendering the policies most important for determining the application out-of-date. It also engages the 'tilted balance' in which permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits⁶.

Environmental Impact Assessment

- 2.14. The process of Environmental Impact Assessment (EIA) is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), which came into force on 16th May 2017.
- 2.15. The EIA Regulations sets out a procedure for identifying projects which should be subject to an Environmental Impact Assessment, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects. The aim of an EIA is to protect the environment by ensuring that a decision maker is able to grant planning permission in the full knowledge of the likely significant effects, and to take this into account in the decision-making process.
- 2.16. The requirement for an EIA is based on the likelihood of significant environmental effects arising from the development. There are three stages to the EIA process for a local planning authority to consider a proposal; Screening, Scoping, and the assessment of an Environmental Statement (ES).
- 2.17. A Screening Opinion is used to determine whether a proposal falls within the remit of the EIA Regulations and therefore requires an EIA to be carried out, and if found to be required, a Scoping Opinion is used to determine the extent of the issues to be considered within the ES.
- 2.18. A Scoping Opinion was requested on 7th October 2020 under reference 20/3133/EIA for the redevelopment of Enderby Place to provide up to 750 residential units together with approximately 1,900m² of commercial space (including office, employment, restaurant and cafe uses). RBG Council issued their EIA Scoping Opinion on 17th December 2020. Through the EIA Scoping process, it was confirmed that the following assessments would be included within the Environmental Statement:

⁴ *Forest of Dean DC v SSCLG & Anor* [2016] EWHC 421

⁵ The Judgment was handed down in the context of the 2012 NPPF, however its findings apply equally to the latest NPPF Paragraph 11(d).

⁶ On the basis that the Framework does not provide any clear reason for refusal.

Technical Topic	The Works	Completed and Operational Development	Cumulative Effects
Daylight, Sunlight and Overshadowing	x	✓	✓
Wind Microclimate	x	✓	✓
Traffic and Transport	x	x	✓
Air Quality	x	✓	✓
Noise and Vibration	✓	✓	✓
Socio-economics	x	✓	✓
Flood Risk and Drainage	x	✓	✓
Heritage, Townscape and Visual	✓	✓	✓

- 2.19. The application is supported by an Environmental Statement prepared by Avison Young that covers the above matters.

3. The Proposal

- 3.1. The proposal is for full planning permission for a mixed-use development of the site comprising a total of 564 residential apartments and 1,455m² GIA of non-residential floorspace. The development is formed of four main blocks of various heights and sculptural forms, all positioned around a large garden in the centre of the site.
- 3.2. The site is positioned at a level approximately 3.5m lower than the two neighbouring sites at Enderby Wharf and Morden Wharf. The main access to the site, Telcon Way, falls as it approaches the site. The site layout strategy therefore is to utilise the natural ground level to accommodate all parking and servicing needs for the development at what is the natural ground level, and sit the development atop thereby creating a site-wide podium. This means that the podium level will connect with the adjoining sites in a more appropriate and legible way for users of the development and the general public. At the western side of the site, a riverfront area of public realm is proposed which includes amphitheatre theatre stepped seating to gradually then bring the level back down to natural ground level to meet the Thames Path.
- 3.3. The four buildings, named Telcon Tower, Morden Tower, River Tower and Telegraph Block, are connected in pairs. Telcon Tower and Morden Tower are two connected buildings of differing heights, positioned along the eastern boundary of the site, adjacent to the existing light industrial unit. Telcon Tower marks the entrance to the site off Telcon Way and is proposed to be 23 storeys in height with shoulder heights of 22 storeys on its northern side (where it connects to Morden Tower) and 17 storeys on the southern side where it adjoins the main access. To bring a more human scale to the main access of Telecon Way, Telcon Tower then drops in height again to 3 storeys with a fully glazed corner to mark the entrance to the site.
- 3.4. Telcon Block comprises 132 residential apartments (private and affordable) and 460m² of commercial floorspace across two lowest floors (podium and level 1) positioned at the point of the entrance on Telcon Way.
- 3.5. Morden Block rises to a total height of 34 storeys with shoulder heights of 32 storeys on the southern side (connecting to Telecon Block) and 33 storeys on the northern side. It comprises 258 apartments (both affordable and private).
- 3.6. As the name suggests, River Tower is positioned towards the western end of the Site close to the River Thames. It is set back from the river to create a generous area of public realm with amphitheatre style seating and areas of recreation that will engage with the Thames Path. River Tower is proposed to be 23 storeys with shoulder heights of 21 and 19 storeys and a 3 storey section to the western side to bring a human scale where it engages with the riverfront public realm. River Tower contains 500m² of floor space at ground level (with the potential to also provide a mezzanine) that is intended to be used as a

community space and café that will engage with the public realm. 162 residential apartments are then provided on the remaining floors.

- 3.7. River tower then connects at a perpendicular angle to a 4-storey block of family houses and maisonettes within Telegraph Block which face directly onto Telegraph Avenue. This provides a human scale to Telegraph Avenue, which is the main vehicular and pedestrian route from east to west. Family houses are provided on the lower two floors with individual front doors, private front and rear gardens, with family maisonette apartments provided on top across floors 3 and 4.
- 3.8. Along the northern boundary of the site with Morden Wharf there is a historic stone wall, designed to be incorporated into the site. The natural ground level of the site in this location is retained to provide a Super Ha-Ha with smaller commercial units designed into the podium, which will look out onto the stone wall. Because the development at this point will not be atop the podium, there is the opportunity for more substantial trees and planting to be provided. The total commercial (light industrial) floorspace of the Super Ha-Ha is 485m² and it is proposed to be split into 5 small units but there is flexibility in how these units can be divided to meets the changing requirements for SME businesses.
- 3.9. The site layout is centred on a landscape-led approach, whereby the Central Garden and the riverside public realm has informed the layout. By containing all parking and servicing needs within the podium, the change in levels between the site and its neighbours can be effectively contained to ensure the useable areas for residents and the general public connect logically and conveniently between adjoining sites on this stretch of Peninsula West.

4. Land Use Principles

Good Growth

- 4.1. The NPPF establishes a presumption in favour of sustainable development, which is the ‘golden thread’ through all levels of planning policy. It promotes the efficient use of land and requires making as much use as possible of previously developed land, specifically acknowledging the multiple benefits that can be delivered by adopting a mixed-use approach (Paras. 117-118).
- 4.2. Building on the ‘golden thread’ principle of sustainable development, the London Plan 2021 (LP) is underpinned by the principle of ‘Good Growth’ – being growth that is socially and economically inclusive and environmentally sustainable. Policies GG1 to GG6 promote Good Growth through a holistic set of strategic policies. These include making the best use of land particularly in Opportunity Areas, the intensification of land to support additional homes and workspaces (Policy GG2), delivery of the homes Londoners need through the creation of mixed and inclusive communities (Policy GG4), and provision of sufficient employment and industrial space in the right locations to support economic development and regeneration (Policy GG5).
- 4.3. The London Plan identifies Opportunity Areas as the significant locations with development capacity to accommodate new housing, commercial development and infrastructure of all types (Para. 2.1.1). Development proposals within such areas are, amongst other things, required to support development which creates employment opportunities and housing choices for Londoners, with the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, include ambitious transport mode share targets and support wider regeneration through integration of development proposals with surrounding areas (LP Policy SD1).
- 4.4. The site, Enderby Place, is within the Greenwich Peninsular Opportunity Area (GPOA), which is part of the Thames Estuary North and South Growth Corridor, with an identified capacity of 17,000 new homes and 15,5000 new jobs (LP Table 2.1). The wider growth corridor is noted to be a priority for regeneration and economic development with the largest concentration of OAs in London, with potential for over 250,000 new homes and 200,000 new jobs.
- 4.5. The site also falls within the Greenwich Peninsula West Strategic Development Location (SDL) in the RBG Core Strategy (CS Policy EA3). The Core Strategy aspires for the area to become a new urban quarter for a range of uses, including residential and commercial that would provide more effective use of land and accompany the redevelopment that is taking place on the rest of the Peninsula. It requires that any new development within the SDL is sufficiently buffered from retained SIL and safeguarded wharves to minimise the potential for conflicts of use and ensure an appropriate interface with new residents. CS Policy EA3 does not provide detailed guidance for individual sites within the SDL, noting that the Greenwich Peninsula West Masterplan SPD (2012) will guide development in the area. This

masterplan sets out the high-level vision and objectives for the SDL and outlines key development principles for the area.

Establishing the Existing Lawful Use

- 4.6. Prior to the 2012 consent for Enderby Wharf⁷ (which the Site formed part of), the site was historically used for industrial purposes as part of the Alcatel works site and fell within the Greenwich Peninsula West Strategic Industrial Location (SIL). When granting permission in 2012 for Enderby Wharf⁸, the Council concluded that it was a departure from the Plan, but the release of the land was considered acceptable because of the inclusion at the time of the cruise liner terminal (CLT) which attracted significant employment opportunities. The 2015 permission that followed for the north part of the site (the Enderby Place site) was considered acceptable due to the earlier consent that was underway. Nonetheless, the 2021 Certificate of Lawfulness confirmed that the 2015 planning permission for a residential-led mixed-use development (including a CLT) had been lawfully implemented (although not significantly).
- 4.7. The Council acknowledged within its pre-application letter dated 13 July 2022 that despite the historical justification for the SIL release linked to the CLT proposal, it acknowledged that a non-industrial permission had been implemented and most of the Site has been released from its SIL designation, so can no longer be classed as an industrial site. It is also highlighted that CS Policy EA(a) which seeks to protect local industrial sites, explicitly notes that it does not apply to the Greenwich Peninsular West Strategic Development Location as these areas are undergoing significant change and this policy would not support wider sustainable objectives if applied to this area. Officers confirmed therefore, that the London Plan policies relating to industrial use would not apply.
- 4.8. The Site has been vacant now for some time with the last of the buildings cleared from the site in 2014 when commencement of the earlier permission took place (confirmed by the Lawful Development Certificate). The existing site, therefore, has 'nil' use. In the context of the implemented extant consent and CS Policy EA3 designation as a SDL, a residential-led mixed use development is, in principle, acceptable.

Proposed Residential Use

- 4.9. Paragraph 60 of the NPPF states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

⁷ 10/3063/F

⁸ 10/3063/F

- 4.10. Paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.
- 4.11. The RBG Core Strategy recognises the need to optimise the use of land to deliver the national growth agenda and London Plan housing requirements. Housing growth is directed by CS Policy H1 to six Strategic Development Locations, one of which includes the Greenwich Peninsula West SDL.
- 4.12. The London Plan minimum housing target for RBG as set out in LP Policy 4.1 and Table 4.1 is 28,240 new dwellings over the 10 year period 2019/20 – 2028/29 (equating to 2,824 units per year).
- 4.13. The Council has not published an Authority Monitoring Report since 2020, which covered the period April 2018 – March 2019. The Government’s Housing Delivery Test (HDT) results have also not been published since January 2022, for the 2021 measurement. Based on the data available up to the 2021 HDT measurement, housing completions in RBG have averaged 1,936 dwellings per annum over the past 5 years, thereby equating to 68% of the London Plan minimum target (2,824). Table 6.1 below highlights the number of completions across the last five years:

	2016-17	2017-18	2018-19	2019-20	2020-21	Average
Housing completions (net)	2116	1990	1477	3055	1042	1936

- 4.14. The 2021 HDT results for RBG for the preceding three years of data, records a total delivery of 5,574 homes delivered against a housing need target of 6,985, with a measurement of 80%, thereby requiring RBG to add a 20% ‘buffer’ to its 5 year housing land supply calculation.
- 4.15. As explained in the Decision Making Framework chapter of this report, the Council does not have a 5YHLS, with a 2022 appeal decision⁹ recording an agreed position with the LPA of 3.15 years.
- 4.16. As set out in Policies EA1 and EA3 of the Royal Greenwich Local Plan, and encouraged by Policies SD1, GG2 and GG4 of the London Plan, there is a clear policy presumption in favour of delivering high-density residential and mixed-use developments on brownfield sites within the Greenwich Peninsula West SDL and the Greenwich Peninsula OA.
- 4.17. In that context therefore, and drawing on the objectives of the NPPF, the London Plan and the Local Plan to boost housing supply significantly on brownfield land, the development would contribute significantly to addressing the shortfall, and will provide a valuable contribution to the Borough-wide and

⁹ APP/E5330/W/21/3285177

strategic housing objectives. Accordingly, the provision of new homes on the application site is compliant with the relevant development plan policies at all levels.

Proposed Non-Residential Uses

- 4.18. The acceptability of the proposed commercial uses in this location and the economic benefits that arise in relation to relevant policies, is covered in the next chapter 'Town Centre Uses and Economic Benefits'.

Agent of Change

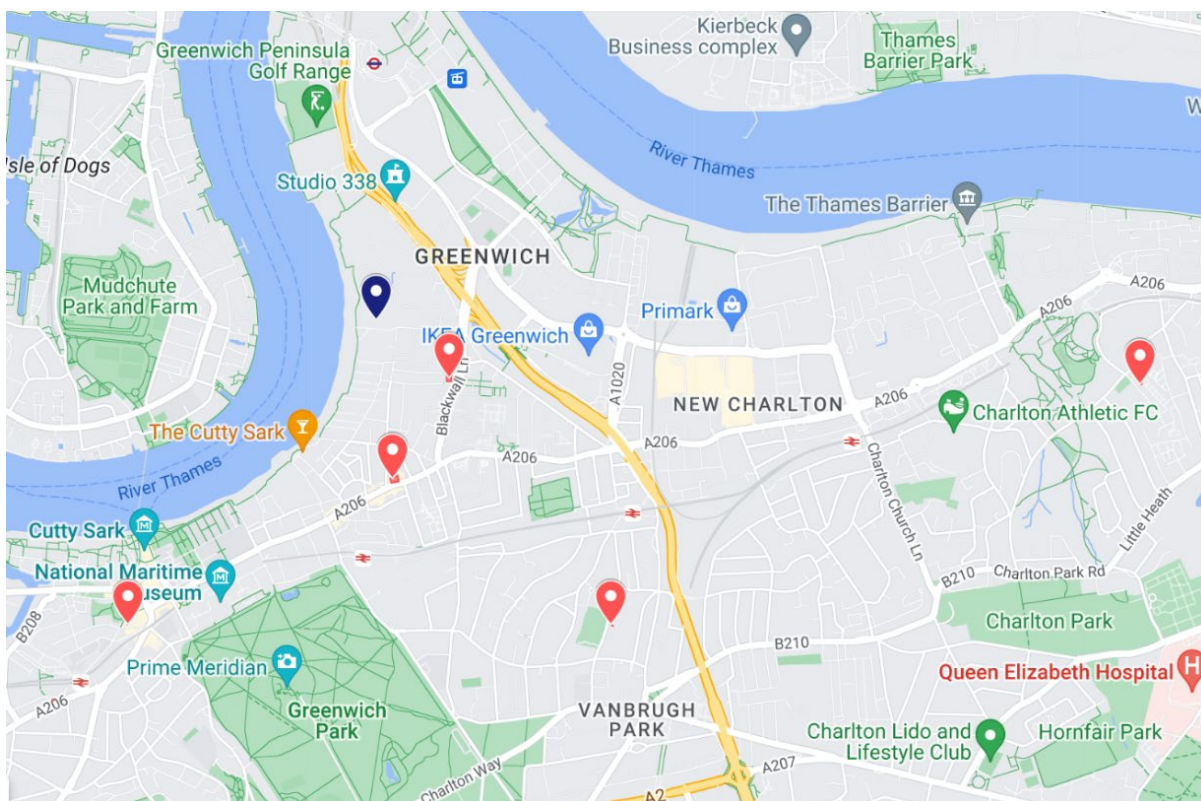
- 4.19. The NPPF requires that planning decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (para 182). It goes on to state that where an operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development is completed.
- 4.20. These objectives are effectively repeated within LP Policy D12, which requires new development to be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue to grow without undue restrictions placed upon them. This is required to be achieved by ensuring good design mitigates and minimises existing and potential nuisances, exploring these mitigation measures early in the design process, and separating new noise sensitive development from existing noise-generating uses through design.
- 4.21. The only remaining neighbours to the site providing on-going industrial activity is the retained units immediately north of Telcon Way. The proposed development would introduce residential uses alongside these neighbouring industrial uses, however due to the boundary relationship and building positions, it would only be the occupiers of the north section of Morden Tower that could be affected being in the closest proximity to the vehicle yard.
- 4.22. Noise and disturbance could come from either vehicle movements, loading / unloading, but also from the business operations. It is understood that the uses all fall within the 'light industrial' category, which, by definition, are uses that can co-exist alongside residential, so there would only be minimal if any, disturbance. There are also no windows within the south or west facing elevation of the units facing the site. The vehicular access to these units is off Salutation Road and not Telcon Way, meaning that vehicle movement associated with the operation would be well separated from the proposed development. The units themselves would act as a buffer from any noise associated with vehicle movements or loading / unloading noise, with only a small proportion of residents within the northern part of Morden Tower potentially experiencing some minimal disturbance. In any event, the background noise assessment undertaken confirms that the existing conditions are relatively quiet to the extent that there would not be any conflict between the residential and light industrial uses co-existing.

4.23. On that basis therefore, it is not necessary to provide specific mitigation measures within the proposed development, as the on-going operation of the adjoining business would not be impeded. The proposal therefore complies with the requirements of the NPPF and LP Policy D12 in this regard.

5. Town Centre Uses and Economic Benefits

Town Centre Uses Assessment

- 5.1. The NPPF establishes that Local Planning Authorities should apply the sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. This is echoed by London Plan policy SD7 and at a local level by RBG CS Policy TC1.
- 5.2. The NPPF defines main town centres uses as “*Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*”
- 5.3. The RBG Core Strategy identifies a hierarchy of town centres. Woolwich is the nearest Major Centre about 5 km to the east, with East Greenwich District Centre about 1.5 km to the south. A new District Centre is proposed at North Greenwich including recent development at the O2 Arena which is approximately 1km to the north of the site, and Greenwich West is around 2 km to the south-west. The Site is therefore not within or on the edge of a town centre, although facilities within these centres are easily accessible.
- 5.4. The proposed light-industrial use is not a main town use, however the café function within the community / cafe space could be considered a main town centre use, and thus for the sake of robustness sequential test policy has been considered.
- 5.5. Although a sustainable location for development, the site’s general location has a shortfall of community facilities. The map below shows the existing community facilities relative to the site.



- 5.6. Although the nearby Rothbury Hall provides a community facility, this cannot cater for all of the existing and future local demand. The proposed community space would therefore assist in increasing the supply of such spaces. However, the Applicant is mindful that such spaces require a sustainable income in order to cross-subsidise the running costs of the community function. There is a natural synergy and symbiosis between community and café functions in order to create a sustainable self-contained operation.
- 5.7. The NPPG states that the “*use of the sequential test must recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations*”. In addition, RBG CS Policy EA3 sets out that a new urban quarter will be created at Greenwich Peninsula West as a Strategic Development Location, to include a range of uses including commercial.
- 5.8. Recognising the important planning benefit of delivering the community space¹⁰ in this location, and that such a use requires an income producing function in order to be self-sufficient, the proposed café function is considered to have a ‘particular locational requirement’.
- 5.9. The proposal would not undermine the existing Town Centres as the primary locations for commercial activity, and would still ensure a successful, competitive and diverse economy. The proposed community

¹⁰ Local Plan CH1 and London Plan GG1

space would ensure there is sustainable access to services for local residents, providing the necessary social infrastructure and supporting an identified need in the area.

Economic Statement

- 5.10. As confirmed earlier in this Statement, the existing site has 'nil' use, having been cleared of buildings in 2014. Hence there is no existing employment on site. The quantum of floorspace proposed for each use in the development is as follows:

Proposed Use	NIA (m ²)	GIA (m ²)	GEA (m ²)
Light Industrial	698	945	1064
Community/ Café	459	500	603
Total	1,157	1,445	1,667

- 5.11. The table below breaks down the likely amount of employment for each use, based on full-time equivalent. At the current time it is unknown how this provision would be split between full-time and part-time jobs, as occupants for the workspaces have not been identified.

Proposed Use	Full Time Employment Equivalent
Light Industrial	47 employees
Community / Café	26 employees

- 5.12. The proposed floorspace has been designed to maximise flexibility of the spaces and size of the units. The commercial spaces will be provided within three locations in the development. Two floors are proposed within the lower parts of Telcon Tower, that can either operate as one commercial unit or two smaller floorplates with a shared entrance and reception (230m² per floor). These workspaces would have good visibility along Telcon Way with a glazed corner and feature stair marking the entrance.
- 5.13. The Super Ha-Ha commercial space will provide 485m² of space in total with flexibility over the number of smaller units this could be split into. The introduction of smaller standalone units will offer the opportunity to start-up businesses to grow within the development. Workshop and light industrial units could be accommodated within the floorplate as well as break out areas, circulation and banks of smaller units. These units will have a unique position within the development with views out onto the historic wall with a generous amount of soft planting within the Super Ha-Ha.

- 5.14. The third space is proposed as a community space / café fronting onto the proposed riverside park, which proposes 500m² with the potential for an additional mezzanine level. This will engage with the public realm at the riverfront and the space around the existing Enderby House. This will ensure that there is sustainable access to services for local residents, providing the necessary social infrastructure and supporting an identified need in the area. The café space would support activity within the area, drawing people into this space, specifically the River Garden and allowing the space to become a positive destination for locals.
- 5.15. More detail on the different commercial spaces are provided in the Design and Access Statement.
- 5.16. Once occupied, the 564 residential households (expected to comprise 1,127 occupants) would use local services and facilities, increase economic activity within the wider area, and supporting sustainable growth of Greenwich. The proposal is supported by the development plan and other material considerations, including:
- Helping to support the creation of a new urban quarter in Greenwich Peninsula, intensifying employment opportunities and activity within this space, as supported by Policy EA1, EA3 and EA(a) of the Local Plan.
 - As set out in Policy GG5 of the London Plan, the proposal would encourage economic activity and growth in an area that currently has nil economic activity. This would provide sufficient employment and industrial space in the right locations to support economic development and regeneration of the Greenwich Peninsula.
 - Providing a significant quantum of E(g)(iii) workspace, including flexible space suitable for SMEs, in accordance with London Plan Policies E2.

6. High Quality New Homes

Mixed and Balanced Communities

- 6.1. The development proposes 564 new homes. A detailed Schedule of Accommodation is included within the Design & Access Statement, which includes a breakdown of the unit mix, tenures and ground floor uses across the three proposed buildings. The table below provides a summary of residential mix across the whole development:

	1B2P	2B3P	2B4P	3B5P	3B6P	4B6P	TOTAL
TOTAL	282	87	117	70	0	8	564
		204		70			
%	50%	36%		12%		1%	100%

- 6.2. The NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies and sustainable, inclusive and mixed communities are to be created.
- 6.3. London Plan Policy H10 requires new developments to offer a range of housing choices, in terms of the mix of housing sizes and types, based on the range of needs identified including family-sized homes.
- 6.4. RBG Core Strategy Policy H2 seeks a mix of housing types and sizes in all developments and states that they should contain a proportion of 3, 4 and 4+ bedroom units. The Policy provides flexibility, noting that the *“exact mix on each site will vary according to the location of the development and the character of the surrounding area”*.
- 6.5. Both policies noted above recognise that the optimum mix will vary and will need to be considered on an individual site basis. In terms of the balancing the optimum quantum of family units, both policies recognise the need to optimise housing potential and that the role of 1 and 2 bedroom units can free-up existing family housing and reduce pressure to convert and sub-divide the existing stock of family houses.
- 6.6. The recently consented Morden Wharf development proposed a range of 11-17% for larger family units, with at least 70% comprised of 1 and 2 beds and less than 10% studios¹¹. The Council concluded that *“the proposed unit mix range provides an appropriate framework for delivering a good mix of unit types, thereby encouraging community cohesion...It is therefore considered that the proposed development,*

¹¹ Morden Wharf was a hybrid application (part detailed, part outline) based on parameters. The combined maximum parameters leads to more than 100% and the combined minimum parameters less than 100%.

*due to its nature, location and context, provides an acceptable mix of unit types in accordance with Policy H2 of the Core Strategy and Policy H10 of the London Plan, having regard to the infrastructure requirements of Policy D2 of the London Plan*¹².

- 6.7. The Council also recognised that because the proposal is part of a larger regeneration programme across Greenwich Peninsula West, the site's existing PTAL should not be used as a basis for calculating the proportion of family homes, as the PTAL is planned to improve as this part of the peninsula becomes more permeable and accessible by various modes of sustainable transport. Whilst not relevant to PTAL, the introduction of a Thames Clipper stop to operate from the jetty adjacent to the site would also improve the situation.
- 6.8. The unit mix as tabled above, proposes a very similar mix to the consented Morden Wharf development, with 14% larger homes (3 and 4 bedrooms) and 86% smaller homes (1 and 2 bedrooms) with no studios. The same conclusion can therefore be reached regarding the acceptability of the unit mix - it will provide the conditions to create a balanced and mixed community in accordance with RBG CS Policy H2 and LP Policy H10.

Accessible Housing and Inclusive Design

- 6.9. To provide genuine choice for London's diverse population, including disabled people and families with young children, LP Policy D7 (Accessible housing) states that all residential development should include at least 10% of new homes as 'wheelchair user dwellings' to comply with Part M4(3) of the Building Regulations, with the remaining 90% of units as 'accessible and adaptable dwellings' to comply with Part M4(2). RBG CS Policy H5 also requires the same.
- 6.10. More generally, LP Policy D5 concerning inclusive design requires new development to achieve the highest standards of accessible and inclusive design by providing people-focused spaces that facilitate social interaction and inclusion, are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all.
- 6.11. The development includes 60 units that are designed to comply with Part M4(3) 'wheelchair accessible homes' of the Buildings Regulations, which is more than 10% of the whole development. The remaining 90% of the units are designed to comply with M4(2) 'wheelchair adaptable homes'. The accessible homes are positioned throughout the towers in the corners where oversized units can benefit from dual aspects.
- 6.12. Across the development, all communal areas can be accessed by all resident's including those that may have a disability. The entrances to the three principal buildings are step-free with two stair and lift cores, and are grouped around the Central Garden promoting its use as a primary circulation space

¹² Paragraphs 13.10-13.11 of the Morden Wharf Committee Report

encouraging a sense of community to all. More detail is provided within the submitted Accessibility Statement.

Affordable Housing Statement

- 6.13. Policy H4 of the London Plan sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. All major developments, therefore, which trigger affordable housing requirements (10 units or more) should provide affordable housing through the threshold approach, which is set out in LP Policy H5. This states that to follow the Fast Track Route, whereby the applicant is not required to submit a financial viability assessment to support their application, development proposals must meet or exceed the relevant threshold level of affordable housing on site (without public subsidy) and be consistent with the relevant tenure split. In this case the threshold is 35%.
- 6.14. LP Policy H6 concerns affordable housing tenure, and states that affordable housing products within a development should include a minimum of 30% low-cost rented homes (including London Affordable Rent or Social Rent), a minimum of 30% intermediate products which meet the definition of genuinely affordable housing (including London Living Rent and London Shared Ownership), with the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products, based on identified need.
- 6.15. RBG CS Policy H3 states that developments of 10 or more homes or residential sites of 0.5 hectares or more will be required to provide at least 35% affordable housing, with the precise percentage, distribution and type of affordable housing being determined by site specific circumstances and financial viability. The supporting text to Policy H3 requires a split of 70% social/affordable rented and 30% intermediate housing (Para. 4.1.14), but also recognises that the exact mix will vary in different locations (Para. 4.1.15).
- 6.16. A full detailed schedule of accommodation is contained within the accompanying Design and Access Statement. This confirms that the development proposals include 35% affordable housing by habitable room. The table below provides a summarised breakdown of the unit mix split by tenure, demonstrating that within the affordable housing component, 70% is proposed as low-cost rent and 30% as intermediate rent. This therefore meets the threshold approach as set out in London Plan Policies H5 and H6, and subsequently no financial viability information is required to support the application.
- 6.17. In terms of distribution, as the table below confirms, the low cost rented homes are proposed within the lowest two-thirds of the Telcon Tower and maisonettes in the Telegraph Tower. Owing to the proportion of larger low-cost rent family homes, the Telegraph Block lends itself perfectly to the provision of family homes, with good access to the Central Garden, and a more sheltered position within the development along Telegraph Avenue with individual front doors. The human scale of these family homes also relates well to the terraced housing immediately to the south-east of the site. Telcon Tower will contain a mix of both low-cost rent and intermediate housing, and similarly the Morden Tower will contain a mix of intermediate and private housing, thereby providing the conditions to foster community cohesion.

Block	Units								
	Low Cost Rent					Intermediate			
	1B2P	2B3P	2B4P	3B5P	4B6P	1B2P	2B3P	2B4P	3B5P
River									
Telegraph					8				
Morden						23	7	10	7
Telecon	14	14	68	14		22			
Total hab rooms	368 (70%)					160 (30%)			
% by hab room	11.9%	11.9%	57.6%	11.9%	6.8%	53.5%	12.3%	17.7%	16.5%

Table 2: Affordable housing unit mix

Internal Residential Quality

- 6.18. Policy D6 of the London Plan relates to housing quality and standards and requires all new residential properties to meet the minimum internal space standards, which mirror those set nationally within the Nationally Described Space Standards. LP Policy D6 further states that the minimum floor to ceiling height must be 2.5m for at least 75 per cent of the GIA of each dwelling, and developments should provide adequately-sized rooms with comfortable and functional layouts that are fit for purpose. Proposals should maximise the provision of dual aspect dwellings and avoid single aspect dwellings where possible. New homes should have adequate daylight and sunlight whilst avoiding overheating and provide the required amount of external amenity space.
- 6.19. RBG CS Policy H5 relates to housing design and echoes many of the requirement set out within LP Policy D6, requiring both internal and external design quality in new residential development.
- 6.20. The detailed schedule of accommodation submitted with the application and the other block schedules contained within the Design and Access Statement provide a detailed breakdown unit by unit of the internal GIA of each unit. All exceed the minimum space standard requirements and have logical and convenient layouts. The internal layout has been designed to maximise dual aspect units. As a result of layout refinement through the various pre-application iterations, the scheme now has no north-facing single aspect units. Input from the daylight consultant throughout design development has also ensured that the internal layout of units, positioning of windows and depth of rooms ensures that natural daylighting is maximised, whilst also ensuring that overheating is controlled. There are some parts of the development and floors where single aspect units are unavoidable, but even in these limited cases the main living area provides an 'enhanced' aspect with corner windows. Balconies are also positioned to the side rather than the external face to avoid overshadowing or limiting views out. Across the whole development, 37 units (7%) of the units would be single aspect (none north-facing), which on a development of this scale should be considered a high level of compliance.
- 6.21. The design process has included input from MEP, fire and structural engineers to ensure floor build-ups can be accommodated that will not later impede the ability to achieve minimum floor-to-ceiling heights

of 2.5m. The development proposals therefore have been designed to achieve this with greater floor height at ground floor of circa 2.6m.

Private and Communal Amenity Space

- 6.22. LP Policy D6 and Standard 26 of the Mayor's London Housing SPG sets out that a minimum of 5m² of private outdoor amenity space should be provided for 1-2 person dwellings with an additional 1m² for each additional occupant. It must also achieve a minimum width and depth of 1.5 metres to be functional and fit for purpose.
- 6.23. RBG CS Policy H5 states that Core Strategy Policy H5 states that a good-sized balcony, terrace or enclosed communal gardens should be provided for flats and family housing should normally have direct access to a private garden. Supporting text paragraph 4.1.31 states that new developments should secure some usable private amenity space for all households; and paragraph 4.1.32 goes on to state that communal gardens in developments of flats should be for the use of residents only and appropriate privacy screening should be provided for ground floor units.
- 6.24. As demonstrated on the plans and detailed within the Design and Access Statement, every apartment has a private corner or recessed balcony exceeding the minimum requirements of the London Plan and the SPG. The development also includes a generous proportion of excellent quality communal amenity gardens and public realm.
- 6.25. The development proposals adopt a landscape-led approach with the provision of two clearly defined landscape areas – The Riverfront and The Residents' Garden – with further space provided along Telegraph Avenue. The Riverfront is designed as an area of public realm connected to the future Thames Clipper jetty and Thames Path, and also relates to the public realm around Enderby House and a similar space on the river edge at Morden Wharf. It is proposed to include amphitheatre seating with water feature and café spill out space acting as a versatile play area and community gathering space. In terms of The Residents' Garden, the three principal buildings have their entrances onto this space, which will provide good natural surveillance, activity and foster a sense of community. This garden will provide a multifunctional, flexible space for both adults and children, with both designated play areas and play features designed into the landscape (like mounds, tunnels, climbing structures, stepping stones), together with accessible paths and large lawn areas. The Residents' Garden will be a sheltered space from the wind that will receive good sunlight, separated from the south by Telegraph Block and to the north by the Super-Haha soft boundary. There is also a further smaller area towards the north-eastern boundary adjacent to Morden Tower proposed as the Allotment Gardens.

Playspace

- 6.26. LP Policy S4 requires that development proposals include suitable provision for play and recreation and incorporate good quality, accessible play provision for all ages. The Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation'

(September 2012) sets out further guidance on this matter, and confirms that a minimum of 10m² per child should be provided.

- 6.27. In addition, RBG CS Policy H(e) requires that in developments that include over 50 units of family housing, suitably equipped and well-designed children's play areas are provided for different age groups, and also cites the Mayors SPG as providing additional guidance.
- 6.28. Using the GLA's population calculator for an Inner London location with low PTAL, the child yield is circa 197, requiring a total of 1,971m² of on-site playspace. The Landscape Strategy by Spacehub that accompanies the application contains full details of the play strategy for each of the age groups, demonstrating that overall, the site can accommodate the play needs for the expected child yield. Whilst there would be a slight shortfall in the 12+ age group provision on site, the provision on-site for the younger age groups would exceed the requirements, so the overall amount of playspace has been met.
- 6.29. The Spacehub Landscape Strategy includes an assessment of local play and recreation facilities within a 5- and 10-minute walk from the site, demonstrating that there are further facilities available within an accessible distance from the site for all age groups.
- 6.30. The Spacehub strategy is to integrate play into both the areas of public realm (Riverfront) and residents garden (Central Garden and Telegraph Avenue). This will provide opportunities for play and activity for children within the landscape but also provide places for adults to relax and socialise while their children engage in other activities.

7. Place Shaping, Townscape and Built Heritage

General site layout and public realm

- 7.1. Good design is central to the objectives of the London Plan and RBG Local Plan drawing on objectives set out in the NPPF. The NPPF states that the creation of high-quality places is fundamental to the planning and development process (Para 12.4). Paragraph 127 sets out criteria for development proposals to ensure that they:
- Function well and add to the overall quality of the area over the lifetime of the development;
 - Are visually attractive;
 - Are sympathetic to the surrounding built environment and landscape setting;
 - Establish a strong sense of place;
 - Optimise the potential of the site; and
 - Create safe, inclusive and accessible places.
- 7.2. Chapter 3 of the London Plan relates to good design, both general and specific design principles. LP Policy D3 requires developments to provide a high-quality design response that optimises the capacity of sites with considerations of matters such as form and layout, character, experience and quality. Policy D8 (Public Realm) states that new development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks. Policy D9 relates to the specific design issues associated with tall and large-scale buildings.
- 7.3. RBG CS Policy DH1 emphasises that to achieve high quality design, all developments are expected to promote local distinctiveness by providing a site-specific design solution, creating attractive, manageable well-functioning spaces within the site.
- 7.4. The Site benefits from an extant consent, which has been lawfully implemented (and confirmed by Lawful Development Certificate), for a development that included three buildings of 24, 27 and 32 storeys. Whilst the Council place limited weight on the consent (because of the uncertainty over delivery of the CLT) and consequently consider that the rationale for the consented heights and 'landmark' status has fallen away, it accepts that tall buildings, in principle, would be acceptable on this site given the existence of the extant consent and objectives of the relevant policies relating to the OA and SDL. The

assessment therefore is on the ability for height to drive place-making and regeneration and achieve the objectives of viably creating a new mixed-use quarter to Peninsula West.

- 7.5. The applicant team has engaged in an extensive pre-application and design review process with the Council and the DRP. Throughout this process, the layout, design and distribution of mass and height has been entirely re-worked from first principles and then refined to arrive at a final design that addresses the feedback received. Whilst the extant consent has been used to inform the new proposals, it has not been slavishly relied upon, and the site has been approached afresh, and informed by the existing and emerging context.
- 7.6. The layout adopts a landscape-led approach, putting the creation of a generous, high-quality and comfortable residents garden at the heart of the development, from which the three main buildings will be accessed. The riverfront area is then provided as a more public open space, setting the buildings back from the river to ensure the open character of the river is maintained, whilst providing new public realm connected to the Thames Path for the general public to enjoy. Starting from this landscape-led position has informed where buildings would be best positioned, and this has been consistently tested against environmental effects (wind, daylight, movement) and in views and townscape analysis to ensure that the position, form and mass of each building block relates well to existing and emerging buildings. As detailed within the DAS and the other accompanying reports, the layout proposed, would wholly delivery the objectives of the design policies in chapter 3 of the London Plan and the RBG Local Plan.
- 7.7. The proposed design recognises the opportunity to optimise development of the site in this important location within the OA and SDL and adjacent to the now consented development at Morden Wharf, whilst also recognising and integrating with the predominantly mid-rise surrounding context to the south. The new design seeks to bridge between the height variations of neighbouring buildings. To the south the existing buildings at Enderby Wharf and Telegraph Works can be described as mid-height (8 - 13 storeys). To the north, the new consent at Morden Wharf contains much taller buildings of 25 - 37 storeys. The proposed development, with heights ranging across the three taller blocks of 35 and 23 storeys with lower shoulders and the 4 storey maisonettes, will provide a bridge between these adjoining contexts. The tallest part of the proposed development, Morden Tower at 35 storeys, has also been carefully formed with shoulder heights that thereby avoids coalescence with the taller buildings at Morden Wharf. The development will achieve an attractive clustering of towers of varying heights in this part of the peninsula. The layout and massing also provides a connection with the street-level human scale of the historic lower rise residential properties on (road) and the proposed Central Garden with the inclusion of 4 storey Telegraph Block providing family houses and maisonettes. The sculpting and form of the towers and their varying heights has been consistently informed through the design refinement process by technical modelling on microclimate / wind, daylight, and the spatial relationship with adjoining buildings (existing and emerging) and heritage assets through views analysis.

Tall Buildings Assessment

7.8. London Plan Policy D9 states that applications for tall buildings should be limited to locations identified in Development Plans, and should address their visual, functional, environmental and cumulative impacts. A full detailed assessment of the proposed development against the Policy D9 criteria is provide below.

7.9. The RBG Core Strategy defines a tall building as follows:

“A tall building is defined as any building, including all types of structures such as masts, pylons, chimneys etc, which is noticeably taller than its surroundings, has a significant impact on the skyline or is larger than the threshold size set for the referral of planning application to the Mayor. Importantly, what is considered tall in one area would not necessarily be considered tall in another.” (para 4.4.16)

7.10. Tall buildings are recognised as enabling sites to be optimised, creating landmarks for an area and the intensification of use that they provide is noted to act as a catalyst for regeneration (Core Strategy paragraph 4.4.17). Furthermore, RBG CS Policy DH2 notes that tall buildings may be appropriate in Greenwich Peninsula West, where this site is located, subject to further assessment on the impact on the existing character of the area, which is set out in full in the HTVIA, DAS and summarised below.

7.11. The following table provides an assessment of the development against the requirements of LP Policy D9 under each of its sub-headings:

LP Policy D9 Assessment Criteria	Scheme Response
Visual Impacts	The accompanying HTVIA includes a comprehensive analysis of townscape and visual impacts. It concludes that the development would generate townscape benefits with buildings that are of a scale and appearance that respects the hierarchy of buildings between Enderby Wharf and Morden Wharf whilst working successfully with the established townscape to the south. The visual assessment concludes overall that the development would form a congruent part of the local and wider townscape, relating to the adjoining sites, Enderby and Morden Wharfs, the historic areas to the south and mixed townscape to the east. Visual receptors would benefit from the improved visual appearance of the redeveloped site, including the creation of landscaped areas and the route along the Site from the waterfront to the east.

<p>Spatial hierarchy of the local and wider context, and aid legibility and wayfinding.</p>	<p>As explained in the DAS and other supporting documents, the height and massing of the development will bridge between the townscape to the south (Enderby Wharf, Telegraph Works and the older low-rise streets) with the taller blocks at Morden Wharf, knitting together these diverging townscape areas. Telegraph Avenue will provide an improved pedestrian and vehicle link to the riverfront connecting into the Thames Path.</p>
<p>Architectural quality and materiality of an exemplary standard.</p>	<p>The detail of the architectural quality is set out within the DAS and has been scrutinised at various points by the Design Review Panel. The materials proposed are durable and climate resilient ensuring longevity.</p>
<p>Should take into account and avoid harm to the significance of London's Heritage assets and their settings.</p>	<p>The supporting HTVIA has assessed the full range of nearby heritage assets agreed with the Council prior to submission, and the impacts that may occur. There are no direct impacts to heritage assets within the site, but there are heritage receptors nearby that may experience effects to their value as a result of change to their setting.</p> <p>The setting to Enderby House (Grade II Listed) is concluded as being improved and appropriate due to the significant public realm and landscape improvements.</p> <p>The report concludes that the development would not be harmful to the setting of those receptors and therefore public benefits are not required as part of the overall planning balance. Notwithstanding, should the decision maker perceive there to be harm, this must be 'less than substantial' in accordance with the extant consent or Morden Wharf development.</p>
<p>Buildings in the setting of a World Heritage Site must preserve and not harm the Outstanding Universal Value of the World Heritage Site.</p>	<p>The HTVIA concludes that the Maritime Greenwich WHS to the west is oriented away from the Site. Both the LVMF view from the heart of the WHS at the General Wolfe statue and the view towards the Royal Hospital, Queen's House and Royal Observatory would be unaffected by the proposed development.</p>
<p>Buildings near the River Thames, particularly in the Thames Policy</p>	<p>The buildings are set back from the river and a new area of exceptional quality public realm (River Garden) is proposed at the river edge connecting to the Thames Path with new</p>

Area, should protect and enhance the open quality of the river.	amphitheatre style seating and informal recreation spaces. The views analysis demonstrates that the open vistas along the River Thames will now be interrupted.
The building should not cause adverse glare.	As detailed within the DAS, the detailed elevational treatment has been carefully considered to ensure excessive glazing is avoided to take account of sun path orientation.
Buildings should be designed to minimise light pollution from internal and external lighting	A sensible wall/glazing ratio would be delivered to minimise light pollution from internal sources. The scheme for the external lighting has not been produced, however will be developed in due course, mindful of this policy expectation.
The building's materials and its emergency exit routes must ensure the safety of all occupants.	The development has been designed with the ongoing involvement of Marshall Fire Consultants to ensure fire safety across all aspects of the design.
Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm	All servicing arrangements are contained at ground level, with the development then sitting on a podium above. The section drawings demonstrate this in more detail. This ensures that all supporting storage, infrastructure and servicing is contained and separated from the public realm, whilst being safe and convenient.
Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use.	All entrances and routes have been carefully considered for the different end users, including residential and commercial and the general public. Entrances are generous in size and welcoming and placed to ensure a logical circulation for all users. Full detail is provided within the DAS.
It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development	The site is within an Opportunity Area and Strategic Development Location, where the relevant policies promote the creation of a new high-density mixed-use urban quarter, alongside improvement to transport infrastructure. The Applicant is committed to contributing to the delivery of a new Thames Clipper pier with the adjoining consented site Morden Wharf, and towards local bus accessibility improvement, to provide new residents with a convenient method of transport, that will improve its overall PTAL.
Jobs, services, facilities and economic activity that will be	The economic statement and the socioeconomic chapter within the ES set out the significant benefits that will arise from

<p>provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area.</p>	<p>the development in terms of an increase in jobs, services and economic activity.</p>
<p>Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</p>	<p>The building is not located within the City Airport Safeguarding Zone. Nor, given the scale of the consented Towers at Morden Wharf to the north, would any solar energy generation be meaningfully affected.</p>
<p>Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.</p>	<p>Microclimate and environmental conditions both internally and externally has informed the design throughout its development and refinement. How the scheme has evolved taking not account this technical work, is set out in greater detail within the DAS.</p>
<p>Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.</p>	<p>As detailed within the accompanying technical reports and DAS, the comfort of residents and the general public when moving through and using the space has been carefully considered and helped to inform the layout and massing strategy.</p>
<p>Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</p>	<p>As noted before, all servicing and plant is contained at ground level beneath the podium, so will be well separated from building uses and the open spaces.</p>
<p>The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when</p>	<p>Cumulatively, the effects are considered acceptable.</p>

assessing tall building proposals and when developing plans for an area.	
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Table 3: LP Policy D9 Tall Buildings Assessment

Built Heritage

- 7.12. In accordance with sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and relevant policy, it is necessary to have special regard to the desirability of preserving the setting of a listed building and to preserving or enhancing the setting of a conservation area. The NPPF notes that 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 (para 196). In respect of effects on the significance of non-designated heritage assets, the NPPF requires that direct and indirect effects on non-designated heritage assets are considered in determining planning applications and that a balanced judgement is made having regard to the scale of any harm or loss of the significance of assets (para 197).
- 7.13. LP Policy HC1 relates to heritage conservation and growth and states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 7.14. RBG CS Policy DH3 (Heritage Assets) and DH(h) (Conservation Areas) state that the borough will protect and enhance heritage assets, by preserving and enhancing the character, appearance and settings. The policies particularly note the importance of local scale, the established pattern of development, building form and the use of materials, and proposals which would have a visual effect on the character and appearance of a Conservation Area should respect the setting of that area.
- 7.15. LP Policy HC2 and RBG CS Policy DH4 both relate to World Heritage Sites (in this case Maritime Greenwich WHS) and sets out that proposals within their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, proposals should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes. The supporting text sets out that the surrounding built environment must be carefully managed to ensure that the attributes of the World Heritage Sites that make them of Outstanding Universal Value are protected and enhanced, while allowing the surrounding area to change and evolve as it has for centuries.
- 7.16. The site is not located within a conservation area, nor does it contain any statutorily or locally listed buildings. However, the Grade II Enderby House falls within the Site (but is excluded from the redline boundary), and the Maritime Greenwich World Heritage Site, several conservation areas and other heritage receptors are nearby that may experience effects to their value as a result of change to their setting.

- 7.17. The accompanying HTVIA considers the effects of both the works of construction and the completed and operational development. With regards the former, it is concluded that the effects would range from Negligible Adverse (heritage receptors) to Negligible Adverse to Minor Adverse (townscape) and None to Moderate Adverse (visual receptors). As a result, the report concludes that the effects on townscape character and views would be significant, but temporary and would only last until the development is complete.
- 7.18. In terms of the completed and operational development, the report concludes that the proposed development would not be harmful to the setting of the identified receptors and therefore public benefits are not required as part of the overall planning balance. Notwithstanding, should the decision-maker perceive there to be harm, this must be 'less than substantial' in accordance with the extant consent for Morden Wharf.
- 7.19. In terms of Enderby House, the report concludes that the development would give rise to a Moderate to Major Beneficial effects by virtue of the improvement of its setting and introduction of high quality public space that enables visitors to appreciate and experience the receptor.
- 7.20. Overall, Minor to Moderate Neutral effects are identified for the Maritime Greenwich WHS. As the composition and Grand Axis of the site would remain unaffected, the effects are deemed neutral and the Outstanding Universal Value remains intact.
- 7.21. The conservation areas nearby and the other receptors in the study area experience small changes to their setting and the effects range from Negligible Neutral to Minor Neutral; these effects are not significant.
- 7.22. The development would therefore comply with the heritage policies identified earlier, namely LP Policies HC1 and HC2 and RBG CS Policies DH3, DH4 and DH(h), and the provisions within Chapter 16 of the NPPF. The provisions of paragraph 202 of the NPPF are not engaged in relation to harm, and similarly, granting permission would be consistent with the duties set out in s.66 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.

8. Neighbour Amenity

- 8.1. London Plan Policy D6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land uses and buildings, avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.
- 8.2. Policy DH(b) of the Royal Greenwich Local Plan (Protection of Amenity for Adjacent Occupiers) sets out that new developments will only be allowed where it can be demonstrated that the proposed development 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 unneighbourly sense of enclosure.
- 8.3. Policy E(a) sets out that planning permission will not normally be granted where a proposed development or change of use would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit.
- 8.4. With particular regard to daylight / sunlight impacts, the London Housing SPG notes that an appropriate degree of flexibility needs to be applied when using the BRE Guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. It recognises that BRE guidelines *“should be applied sensitively to higher density development, especially in opportunity areas... where BRE advice suggests considering the use of alternative targets”*. Such alternative targets should take account of *“local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time”* (Para. 1.3.46). It also notes that:

“The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.” (para 1.3.46)

- 8.5. More recently and of particular relevance to areas where there is an existing or anticipated shortage of land for meeting identified housing needs, the NPPF confirms that *“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”* (para 123)

Outlook and Privacy

- 8.6. In terms of outlook and privacy, the neighbouring buildings identified as being potentially impacted are:
- Towers B07 and T02 on the southern edge of the consented Morden Wharf development, in particular from Morden / Telcon block;
 - Tower T04 on the southern edge of the consented Morden Wharf development, in particular from the proposed River block;
 - The northern sections of Blocks B, C and D within the completed Enderby Wharf development, and Block 4 on the north-western corner of Telegraph Works.
- 8.7. The extant consent set certain parameters of what the Council has previously deemed acceptable relationships between neighbouring blocks. This has been reinforced to some extent by the grant of permission at Morden Wharf where the extant consent for Enderby Place was used as an assessment tool. Nonetheless, the DAS includes an assessment of overlooking zones showing areas that would be within 18m of adjacent façades. This has ensured that relationships with adjoining residential blocks can be improved upon.
- 8.8. The residential component of the hybrid permission for Morden Wharf was in outline only with all matters reserved. The detail available therefore is only for illustrative purposes. Nonetheless, this shows that there is the potential for windows positioned with the south-facing elevations towards the site to be angled to minimise any direct overlooking. Separation distances would be greater than those considered acceptable when the Council assessed Morden Wharf against the extant consent for Enderby Place, as the proposed development has increased the separation of Morden Tower from the northern boundary thereby increasing the separation to Tower B07 of Morden Wharf. The relationship between River Tower T04 (Morden Wharf) and Block B (Enderby Wharf) is similar to the extant scheme that included a building in broadly the same position.
- 8.9. In terms of outlook and privacy therefore, any impacts must be considered in the context of the extant consent. The outlook for the residents of Enderby Wharf would undoubtedly change. However, the residents within the northern part of Blocks B and C have benefitted from an open aspect from an undeveloped site in the knowledge that planning permission exists and so the relationship would change. There would be a degree of mutual overlooking, but this must be balanced against the significant regeneration benefits of developing a site. Overall, any perceived loss of outlook or privacy, is not considered to be beyond acceptable standards within a dense urban quarter.

Daylight and Sunlight

- 8.10. A Daylight & Assessment has been prepared by CPMC Surveying as part of the application.

- 8.11. There is no national planning policy relating to daylight and sunlight and overshadowing. However, general guidance is given on the need to protect existing amenity and provide adequate new accommodation, as set out in the National Planning Policy Framework.
- 8.12. The 2022 (3rd Edition) Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' (The BRE Guide) and BS EN 17037:2018 enable such assessments to be made.
- 8.13. When considering the BRE Guide's requirements, it is important to remember that the Guide is not a set of planning rules, which are either passed or failed. Numerical values are given and used, not as proscriptive or prescriptive values but as a way of comparing situations and arriving at a balanced judgement, and therefore context is of key importance when applying the standards contained in the BRE Guide.
- 8.14. In dense urban locations such as the Greenwich peninsula, site constraints, including the number, height and proximity of other neighbouring buildings mean that it is more difficult for windows, rooms and external amenity space to meet the criteria laid out in the BRE Guide. The BRE Guide is clear that the target levels are by no means mandatory, should be used flexibly and that in certain environments, such as a city location, a higher degree of obstruction is frequently unavoidable.
- 8.15. In this case we have examined the proposal relative to the extant mass contained in the Royal Borough of Greenwich planning application 15/0973/FUL. We have also constructed the outline consent for Morden Wharf's (21/1730/O), which is found to the north of the site, and examined the near facades.
- 8.16. With regard to the constructed blocks to the south, there are no significant sunlight or amenity space impacts. Linear Park also passes the BRE amenity space guidance. It is acknowledged that there are localised daylight impacts to these properties relative to the extant application. Overall, it is not considered that the applicant's proposal causes significant harm to these existing buildings.
- 8.17. The applicant's proposal causes some additional localised harm to the daylight at Morden Wharf, although there is a small improvement in the combined mean for all blocks. The proposal also causes some additional sunlight harm to the near parts of Morden Wharf when a blended average of the blocks is considered. However, a closer examination of the impact across the floor levels indicates that the Applicant's proposal will have a positive impact to important parts of Morden Wharf.
- 8.18. The localised areas of additional impact need to be weighed against a number of improved results, which are frequently found in important locations. Therefore any additional impact relative to the extant scheme is considered on balance to be acceptable in this case.

9. Transport Matters

- 9.1. The NPPF promotes sustainable transport modes and developments must provide appropriate opportunities to promote sustainable transport modes which are safe and suitable for all users.
- 9.2. The London Plan sets out the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. To achieve this, the transport policies acknowledge the need for a modal shift away from car use supported by development proposals which facilitate sustainable travel through their location and design and by not precluding the implementation the Healthy Streets and active travel initiatives.
- 9.3. LP Policy T2 (Healthy Streets) requires developments to demonstrate how they will deliver improvements that support the ten healthy streets indicators, reduce the dominance of vehicles and increase permeability for pedestrians and cyclists. LP Policy T4 requires that impacts on transport network capacity are assessed at the local, networkwide and strategic level.
- 9.4. Core Strategy Policy IM4 sets out the borough level approach to sustainable travel, noting that all development should contribute to improved accessibility and safety and reduce the use of the private car and need to travel. In addition, RBG CS Policy IM(b) encourages new development to integrate with existing footpaths and cycleways and encourage the principles of shared space; and promote walking and cycling safety with well lit, signed and maintained routes.
- 9.5. The application is supported by a Healthy Streets Transport Assessment. This considers the baseline transport conditions by all modes in the local area, who the users of the proposed development might be and where they could be travelling from, and the typical transport needs of the new residents / occupiers of the development.
- 9.6. As shown in the accompanying plans, DAS and TA, all vehicle access will be from Telcon Way including all servicing and deliveries. Active travel access (foot, bicycle etc) will be from numerous points, via footpaths and cycling along Telecon Way and to / from the Thames Path adjacent to the River Thames. As a result of the development pedestrian access in particular will be improved as a result of opening up the Thames Path in front of this site and Morden Wharf to provide wider connections.
- 9.7. The development is proposed to be car-free aside from 3% provision for disabled residents and a further 2 disabled spaces for the commercial uses. All vehicle parking will be located within the ground floor podium. This was broadly welcomed by Council officers during pre-application discussions. Long-stay cycle parking will also be accommodated at ground level beneath the podium with a number of separate stores. Visitor cycle parking will be located within various location in the public realm. The total proposed cycle parking provision is in accordance with London Plan Policy T5.

- 9.8. Following the fifth pre-application meeting with the Council, the GLA and TfL asked the Applicant to explore the possibility of providing the means for a bus route to loop through the Site via the Morden Wharf development. The extensive optioneering work undertaken to explore this is provided within the TA, together with an explanation as to why it would not be viable or feasible and would be detrimental to the overall landscape-led approach and layout of the proposed development. As confirmed by the transport consultant, Markides Associates, it is understood that the Morden Wharf applicant had also discounted access through Enderby Place as an options. Markides Associates had provided potential bus rerouting options utilising Telcon Way and Christchurch Avenue, which would allow for improved bus access to the site without severely harming the quality of the development. Locations of potential bus routes to improve the site PTAL have been identified for buses and an on-road option has been presented, which would deliver all of the benefits sought without detriment to other considerations.
- 9.9. The applicant is also committed to contributing proportionately to the delivery of a new Thames Clipper jetty, most likely to the north-west of the site and primarily within the Morden Wharf land ownership.
- 9.10. In summary, this TA outlines how the proposed development will not result in any material impact to the public transport and road networks within the vicinity of the site. Accordingly, the development proposals are considered to be acceptable, and compliant with the NPPF, LP and RBG policies. The TA draws the following main conclusions:
- The site is accessible in terms of its proximity to existing social and sustainable transport infrastructure.
 - The impact of the development proposals upon the wider transport network can be accommodated without resulting in a severe impact.
 - The overall impact on the London-wide transport network is considered to be negligible.
 - The development is car-free and supported by a Travel Plan Statement to support and encourage users to travel sustainably to and from the site.
 - The proposals will result in increases to the number of trips on the local public transport networks, however given the wide range of services and destinations that can be accessed from the site, once these trips have been distributed across the wide range of services and destinations the overall impact of the development is insignificant.
 - The site benefits from access to a range of sustainable transport modes that can be accessed through a generally comprehensive walking and cycling network, and impact on these networks as a result of development is also negligible.

10. Environmental Impacts

- 10.1. The application is supported by an Environmental Statement, which includes numerous subject specific chapters assessing various environmental impacts, as agreed with the Council through the Scoping Opinion. It is not intended to repeat the contents of the ES here, and some of the conclusions of certain chapters have already been discussed elsewhere in this Statement (for example, Heritage and Townscape Visual Impacts, and Daylight, Sunlight and Overshadowing). The following provides a brief summary of the conclusions of remaining chapters.

Air Quality

- 10.2. Following detailed dispersion modelling, it is predicted that the proposed development will not result in a significant change in pollutant concentrations at existing dwellings or other sensitive receptors.
- 10.3. In addition, the site suitability study determined that existing air quality would not be a constraint on the proposed development with all Air Quality Objectives being met across the site. Regarding the safeguarded wharf to the north (Tunnel Wharf), it is concluded that its activities are located at such a distance from the proposed development that impacts are not expected to occur.
- 10.4. The impacts of the proposed development have also been considered in combination with various other cumulative schemes in the vicinity of the site. It is predicted that the proposed development in combination with such cumulative schemes would not result in a significant change in pollutant concentrations at nearby sensitive receptors.
- 10.5. Overall, it is considered that air quality should not be constraint on the proposed development. The proposal thereby complies with LP Policy SI 1 and RBG CS Policy E(c), which both requires development to minimise increased exposure to existing poor air quality and make provisions to address local problems of air quality to achieve 'air quality neutral'.

Noise and Vibration

- 10.6. The demolition and construction works are anticipated to include activities that would be likely to increase noise levels and potentially cause vibration within and immediately adjacent to the Site. In particular, when activities are occurring closest to the Site boundary in relation to the nearest noise sensitive receptors, this could result in various effects, the most significant being a Moderate Adverse Significant Effect caused by vibration on residential occupants within 20 metres of the activity. This effect would be direct, local, short-term and temporary.
- 10.7. The implementation of noise and vibration mitigation and control measures would help to mitigate and minimise noise disturbances to the occupants of existing adjacent properties, where negligible noise impacts would be ensured and vibration impacts minimised. Such measures would include the utilisation

of low noise generating plant and equipment; enclosing and screening machinery; and using low vibratory foundation methods.

- 10.8. Through implementing best practicable measures, proper and consistent communication between site managers of the Site and Morden Wharf, the noisiest construction activities could be co-ordinated such that the resulting cumulative effects at the receptors would not be in excess of the levels predicted for the proposed development alone.
- 10.9. An assessment of the suitability for the Site for residential uses has been undertaken. The results of the assessment indicate that through the provision of an appropriate glazing and ventilation strategy, the required internal ambient and maximum noise levels would be met for all noise sensitive locations. Similarly, it is indicated that the on-site amenity spaces would be likely to achieve acceptable noise levels for external spaces with the incorporation of suitable mitigation measures.
- 10.10. With the inclusion of condition to secure finer detail on necessary mitigation measures to achieve the predicted effect, the development is able to comply with LP Policy D14 and RBG CS Policy H5, that both require developments to reduce, manage and mitigate noise by avoiding adverse noise impacts, mitigate and minimise existing and potential adverse noise impacts and improve the acoustic environment.

Transport

- 10.11. The assessment of transport and traffic impacts in the ES is limited to the cumulative scenario only. A full Transport Assessment covering all transport matters raised by the proposal is included with the application and is summarised in the preceding chapter of this Statement.
- 10.12. The ES chapter relating to transport states that all relevant Cumulative Schemes would have mechanisms in place to tightly control and manage all construction related traffic, thereby ensuring minimal increases and effects associated with local HDV traffic. The consideration of the proposed development with other Cumulative Schemes found that traffic generated by these Cumulative Schemes during construction and once completed would give rise to insignificant transportation effects on the local road network.
- 10.13. It is expected that the development will be subject to a range of management and mitigation measures to be secured by S106 Agreement or condition, and these are listed within Chapter 9 of the ES.

Wind Microclimate

- 10.14. It is concluded that when the development is complete, the conditions within the Site and surrounds will satisfy the safety and comfort criteria for all uses. The development will have a generally positive impact on the wind microclimate within the immediate region, including for Morden Wharf. The development would therefore comply with LP Policies D8 and D9 that seek to avoid unacceptable harm to the amenity

of surrounding areas from uncomfortable wind and microclimate conditions particularly in relation to tall buildings.

Socio-Economic

- 10.15. Once completed and operational, the Proposed Development would lead to minor adverse effects on the demand for GP facilities, play space and secondary health care. The Proposed Development will generate a substantial Community Infrastructure Levy (CIL) payment (over £4m), which will be used to fund a wide range of infrastructure including healthcare and play space. Contributions would therefore help to mitigate the potential for adverse effects with respect to GPs, secondary healthcare, and play space. It is the responsibility of RBG to apply funds appropriately. Once mitigation is delivered, the residual effect in relation to GPs, secondary health care, and play space would be insignificant.
- 10.16. All other effects, including primary school and secondary school provision are assessed as insignificant therefore do not require additional mitigation.

11. Other Planning Considerations

Trees, Landscape and Urban Greening

- 11.1. The Tree Survey identified 16 no. trees and 1 no. group (T1-T17) within the survey area, 15 within the site boundary with one tree and one group located outside the site to the north. All trees were categorised as either Cat B or C and none are protected by Tree Preservation Order. The report confirms that all of these trees can be retained with just some minor tree works, and protection measures are proposed to ensure their health and protection during construction works.
- 11.2. London Plan Policy G5 introduces the concept of the urban greening factor (UGF) to enables major developments to demonstrate how they have included urban greening as a fundamental element of site and building design. UGF scores should be set out in Local Plans but where they are not LP Policy G5 sets a score of 0.4 for predominately residential and 0.3 for predominately commercial developments, although these should be considered the minimum benchmark.
- 11.3. The Spacehub landscape strategy has comprehensively considered how various forms of hard and soft landscaping, working with existing and proposed planting, can elevate the development. The strategy considers UGF and applying the measures proposed, the development can achieve a UGF in excess of 0.4 (approximately 0.424), which is a significant net gain and should be considered positive given the challenges posed by the site.
- 11.4. The Tree Report also confirms that the proposed landscaping scheme by Spacehub will provide an uplift in tree planting across the site providing an improvement to amenity value and canopy cover for the long-term. The landscape proposals will increase the canopy cover by more than 10%.
- 11.5. The development is therefore capable of complying with LP Policy G5 and G7 and RBG CS Policies DH1 and OS(f) in relation to trees, landscape and urban greening.

Ecology and Biodiversity Net Gain

- 11.6. The NPPF states that development should contribute to and enhance the natural and local environment (para 170), protecting and enhancing valued landscapes and sites of biodiversity value and minimising impacts on and providing net gains for biodiversity.
- 11.7. The site is positioned adjacent to the River Thames and tidal tributaries, which are designated as a Site of Importance for Nature Conservation (SINC). The designation reflects the site being of strategic importance for nature conservation and biodiversity across London and it is afforded protection by the London Plan and RBG Core Strategy.

- 11.8. LP Policy G6 requires developments to manage impacts in biodiversity to secure biodiversity net gains. RBG CS Policy OS(f) (Ecological Factors) states that development proposals should pay attention to the need for consideration and enhancement of the biodiversity and geological features of the site.
- 11.9. A Preliminary Ecology Appraisal of the site was carried out, and this draws the following conclusions:
- 11.10. Adverse effects could be caused to the River Thames should contaminated water run-off occur. Adverse effects could occur to birds if site clearance of vegetation is carried out during bird nesting season. Both of these potential impacts can be effectively managed through applying precautionary measures.
- 11.11. The proposed creation of native and ornamental trees, shrubs, wildflower grassland, hedgerow, green roof, rain garden and introduced shrub would provide an overall habitat enhancement that would be beneficial at the Site level in the long-term. This would result in the proposals achieving a Biodiversity Net Gain Score of 30.79 % in habitat units and + 100 % for hedgerow along with a positive score within the Urban Greening Factor.
- 11.12. Effects on protected and notable species in the post-construction phase are considered to be Negligible. The proposed landscaping and bat and bird boxes would provide supplementary habitat for a range of species including bats and invertebrates.
- 11.13. In conclusion, the proposed development would protect, maintain and enhance biodiversity in accordance with LP Policy G6 (Biodiversity and access to nature) and LP Policy G7 (Trees and woodlands), together with RBG CS Policies OS4, OS(e), OS(f) and OS(g), which relate to biodiversity, wildlife deficiency areas, ecological factors, green and river corridors.

Energy, Sustainability and Whole Life Carbon

- 11.14. The design team has reviewed, interpreted and addressed the relevant planning policies on energy, CO2 emissions and sustainable development and the proposals have reviewed early-stage opportunities for efficiency and clean and renewable technologies. The accompanying Sustainable Design and Construction and Energy Statement provides the following summary of achieved targets:
- Energy efficiency savings for residential and non-residential (25% and 46%);
 - Mechanical ventilation with heat recovery
 - Solar control through layout/orientation;
 - Ambient loop servicing residential and non-residential;
 - Communal air source heat pumps as lead heat feed into ambient loop;
 - Individual water source heat pumps to extract heat from ambient loop in each apartment and each non-residential unit;

- Underfloor heating to apartments to allow for high COPs;
- Immersion top-up for hot water cylinders within apartments;
- Future connections facilitated by plant space under each building to allow for heat exchangers that would take high-grade heat from the district network and exchange it with the ambient loop network;
- Overall 59% savings on-site and 43% renewable energy;
- Zero carbon development through carbon offsetting;
- Rainwater harvesting for irrigation and efficient water fittings to reduce demand for water.
- Waste and recycling management procedures during construction and waste and recycling provision in line with local standards for operation;
- Resource efficiency for the new building.
- Living roofs incorporated.

11.15. All proposals are developed to the planning application stage and will be subject to further design revisions as the scheme progresses. All planning conditions should make due allowances for this.

11.16. In terms of Circular Economy and Whole Life Carbon, the assessment has been undertaken using OneClick LCA, an internationally recognised lifecycle and circular economy assessment tool, and one that has plug-ins that allow assessments to be undertaken using the RICS and GLA methodologies. At the planning stage of any project, there remain a lot of design decisions that have not yet been answered, leaving limited information upon which to undertake a circularity assessment. Nevertheless, various design measures have already been adopted to increase the building circularity. Accordingly, a strategy is set out for addressing the circular economy guidance but is inevitably limited by these considerations. Nonetheless, at this stage, it is considered that the accompanying Circular Economy Statement appropriately addresses the requirements of the London Plan Policy and the Mayor's Guidance in relation to WLC.

Fire Safety

11.17. Marshall Fire were appointed at an early stage of the design development process to ensure the proposals have considered all fire safety requirements and are designed to the highest standard of fire safety.

11.18. The accompanying Fire Statement by Marshall concludes that the overall design proposals can be developed to satisfy the functional requirements of the Building Regulations. In addition, Marshall

consider that the scheme meets Planning Gateway One and gives respect to the proposed changes to Fire Safety in Approved Document B (Volumes 1 & 2, 2022).

11.19. The London Plan requests that the “*highest standards of fire safety*” be considered and therefore property protection (whilst not a Building Regulation requirement) could also be considered to increase the life safety and fire safety of the building. Marshall sets out that further review of the following is necessary:

- Means of escape and firefighting access to the commercial unit to the north of the site.
- Wet riser infill positions on the façade of the development.

11.20. Overall, at this stage, the development has demonstrated compliance with the requirement of LP Policy D12 in relation to fire safety, subject to further detail to be secured by condition.

Flood Risk

11.21. The accompanying Flood Risk Assessment (FRA) highlights that whilst the site is adjacent to the River Thames, it benefits from the Thames Barrier and associated flood defences up to the 100 year predicted extreme 0.1% event.

11.22. After a full assessment of policies, geographical and hydrology of the area, the site is considered to be at a low risk of flooding from all sources. There is a ‘danger for all’ residual risk due to the nearby flood defences being breached or overtopped. The river defence along the site boundary will be raised to 6.20m AOD where required and the ground floor of any residential properties will also be set above the 0.5% event including climate change.

11.23. The residual risk is deemed acceptable through the use of mitigation measures that include a flood plan which details how the site will be evacuated and safe refuse provided. It is noted that all residential units are at a podium level or above meaning that they are above the modelled breach flood level.

11.24. Drainage calculations have been undertaken which provide a suitable strategy for discharging surface water and demonstrates the feasibility of the development proposals utilising SUDS, in line with the London Plan and RBG policies.

11.25. The SUDS include green roofs and permeable paving with discharge into the tidal River Thames and private sewer within Telcon Way as defined within the drainage masterplan for the area.

11.26. Overall, the proposals will have a positive impact on the flood risk in the area, reducing the flow off-site into the local drain and sewer network and therefore lower the flood risk to the surrounding area, whilst the mitigation measures for the residual breach / overtopping event are considered acceptable. The development can therefore fully comply with LP Policies SI 12 and SI 13 and RBG CS Policies E2 and E3.

12. Conclusion

- 12.1. This Planning Statement sets out the rationale for the redevelopment of the site and has considered the key principles of the development against the relevant policies set out within the NPPF, the London Plan and the RBG Local Plan, together with associated guidance.
- 12.2. The site is underutilised, having been cleared in 2014. Hoarding has marked the site boundaries for numerous years now blighting the area and making the Thames Path an unappealing walking and cycling route between Greenwich Town Centre and North Greenwich. The site therefore does not currently make a positive contribution towards placemaking, offers no social infrastructure or access for local residents and is publicly inaccessible.
- 12.3. Enderby Place is located within the Greenwich Peninsula Opportunity Area and falls within the Greenwich Peninsula West Strategic Development Location and is no longer designated a Strategic Industrial Location. The site originally formed part of the wider Enderby Wharf development site, which was largely complete by 2017. The northern part of that site (which is now Enderby Place) never came forward due to various challenges and uncertainties associated with the delivery of the cruise liner terminal that was proposed. A separate planning permission for the northern part (this Site) was subsequently granted in 2015 and works to implement this permission took place (and were confirmed by the grant of a Lawful development Certificate). The principle of a high-density, residential-led mixed-use development is therefore well established.
- 12.4. The potential of the site is recognised in planning policy at all levels. Since 2012 there have been specific planning policy aspirations to regenerate this site and to make a major and integrated contribution towards employment, housing, placemaking and social infrastructure objectives. This is captured in the initial RBG Greenwich Peninsula West Masterplan (2012), RBG Core Strategy (2014) and supported by the London Plan. Adding further importance to the delivery of this site is the fact that the Council is currently unable to demonstrate a 5 year housing land supply of deliverable sites, with a recent appeal decision confirming that the supply is 3.15 years. This position renders the policies most important for determining the application out-of-date. It also engages the 'tilted balance' in which permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 12.5. The new proposals are the product of extensive pre-application engagement with RBG, the GLA, TfL and Design Review Panel, local stakeholders and the wider community. The proposals will provide 564 new homes, and 1,445m² of employment floorspace including small, flexible units for SMEs, and community space with café. The residential component includes 35% affordable housing including 70% proposed for low-cost rent, which meets the fasttrack approach. The principle of the land uses and their quantum optimises the site's opportunity and will deliver the objectives of the NPPF, the London Plan and the RBG Local Plan to make better use of land in Opportunity Area and contribute towards the

delivery of a new urban quarter at Peninsula West. The mixed-use approach and higher-density development allows for a substantially improved public realm to be provided as the basis for an attractive and distinctive new neighbourhood.

12.6. The Riverfront and improved access to the Thames Path will revitalise and regenerate the river front to provide valuable publicly accessible space for the local community. Complementing this public realm, the street edge to Telegraph Avenue will provide activity with front doors onto the street and a human scale by the lower scaled Telegraph block. Urban greening, landscaping and biodiversity net gains will provide for a high-quality and welcoming environment.

12.7. Overall, the proposals will deliver numerous benefits, including:

- Regeneration of an underutilised and long-term vacant site identified for redevelopment and falling within Greenwich Peninsula Opportunity Area;
- Creation of a new mixed-use neighbourhood and community;
- 564 new homes, including and 10% wheelchair housing, designed to the highest quality both internally and externally;
- 35% affordable housing, with 70% of that proportion for low-cost rent;
- Provision of a wide mix of housing types, including a generous proportion of 3 and 4 bed family homes;
- New commercial floorspaces, including flexible space suitable for SMEs;
- Approximately 73 equivalent full-time jobs;
- Providing new public realm at the riverfront and an improved and more welcoming access to the Thames Path;
- Supporting active travel and healthy lifestyles through a package of sustainable transport measures which reduce the need to travel by car and improve access to public transport;
- Provision of a range of play spaces for children of all ages integrated within the central resident's garden and riverfront public realm;
- Delivering associated positive long-term health and wellbeing outcomes through the creation of new employment opportunities, provision of high-quality residential accommodation across a variety of sizes and tenures and public realm improvements;
- Environmental improvements, including new tree planting and substantial biodiversity net gains and urban greening; and

- Financial contributions towards the delivery of local infrastructure via CIL and s106 contributions.
- 12.8. The technical reports and ES accompanying the application consider the impacts of the development and demonstrate how they are acceptable in terms of transport, noise, daylight and sunlight, townscape, heritage and visual impact, air quality, ecology and flood risk perspective.
- 12.9. The proposed development will secure regeneration and revitalisation of one of the few remaining sites on Greenwich Peninsula. It will make a significant contribution towards meeting local housing need and create a range of new employment opportunities, together with valuable public realm on the riverfront.
- 12.10. The proposed development embraces the design and placemaking principles set out in planning policy and guidance stitching together employment and residential through co-location, and will create a truly mixed-use riverside community, revitalising the river front and improving connections for the local community.
- 12.11. The proposal is in accordance with the development plan, and no material considerations indicate otherwise. Consequently planning permission should be granted. The engagement of the tilted balance only reinforces this conclusion.

CENTRO

104 St. John Street
London EC1M 4EH

info@centroplan.co.uk
0203 302 1855