



**ROYAL ARSENAL RIVERSIDE  
THE ROPEYARDS  
PLOTS D & K**

**COVERING LETTER**

**To Support a S.96A NMA  
Application**

MARCH 2024



**Stantec UK Limited**  
7 Soho Square  
London  
W1D 3QB  
UNITED KINGDOM

8<sup>th</sup> March 2024

Our Ref: 33312752800  
Planning Portal Reference: PP-12836084

## VIA PLANING PORTAL

[REDACTED]  
Principal Planning Officer  
Planning & Building Control  
Royal Borough of Greenwich  
The Woolwich Centre  
35 Wellington Street  
London  
SE18 6HQ

Dear Andy,

### **THE WATERFRONT MASTERPLAN, LAND OFF BERESFORD STREET / WOOLWICH HIGH STREET, WOOLWICH, SE18 S.96A NON-MATERIAL AMENDMENT APPLICATION**

On behalf of our client, Berkeley Homes (East Thames) Ltd ('the Applicant'), and further to recent discussions, we have the pleasure of submitting a S.96a Non-Material Amendment ('NMA') application to S.73 Outline Planning Permission dated 17<sup>th</sup> March 2017 (Ref: 16/3025/MA) in relation to the Waterfront Masterplan at Royal Arsenal Riverside.

The reason for this S.96a submission is to facilitate a concurrent Reserved Matters application for Plots D and K (Buildings D1, D2, D3, D4, D5 and K3 K4 & K5) within the Waterfront masterplan, known as The Ropeyards.

This application has been subject to extensive pre-application discussions with the Royal Borough of Greenwich ('RBG') and other key stakeholders.

Further details of this Application and the background to it are set out below.

#### **Planning History**

The principle of residential-led mixed use regeneration of the Site was established by the original Outline Planning Permission dated 19<sup>th</sup> June 2013 (Ref: 13/01170), which approved the erection of 2,032 residential homes and 2,442 sqm of non-residential uses.

Subsequent to this and in connection with the Plot A Reserved Matters Application at that time, the Outline Permission was amended via a S.73 Minor Material Amendment Application (Ref: 16/3025/MA), which was approved on the 17<sup>th</sup> March 2017 with the following description.

***"S73 Variation application in respect of planning permission reference 13/0117/O being an Outline Planning Permission for mixed development comprising 2.032 units and 2.442 (GEA) sqm of non-residential floor space (A1/A2/A3/A4/B1/D1 Use), access, landscaping, public accessible open space, car and cycle parking provision and refuse and recycling storage areas."***

The S.73 Outline Planning Permission includes 71 Conditions and Condition 1 lists the approved Parameter Plans for the Waterfront Masterplan.

## Background

Since the granting of the S.73 Outline Planning Permission, changes in regulations, standards, policy and guidance have led to a considerable reduction in the residential floor space that can be proposed within the approved Parameter Plans and a reduction in the number of homes in Plots D and K.

Consequently, the parameters for Plots D and K have been amended so that the associated Reserved Matters Application can meet emerging fire design requirements under the 2022 Building Safety Act and London Plan Policies D5 and D12, as well as the new 2023 Building Regulations (such as the need for two staircases and three lifts in each building core).

To mitigate the loss of residential floor space and homes, the revised Parameters propose a single storey increase in the consented building heights for Buildings K3, K4 and K5, and Buildings D1, D2, D3 and D4.

In addition, due to the highly inefficient and unviable floor plates which would attract an unacceptable level of service charge as residential buildings, it is proposed to remove Building K1 (market homes) from the Parameter Plans, with the benefit of converting the land to additional publicly accessible green space by extending Maribor Park to Beresford Road, creating a clear connection from Woolwich Town Centre down to the River Thames. The removal of Building K1 also significantly improves the visibility and setting of the adjacent Grade I listed Royal Brass Foundry.

Under the S.73 Outline Planning Permission for Plots D and K, Plot D has permission for three levels of car parking (basement, lower ground and ground floor) accommodating 253 car parking spaces. The construction of these three car parks would require a significant amount of concrete in the form of a concrete frame, slabs and ramps.

In line with RBG's target of achieving carbon neutral by 2030 as set out in the 'Carbon Neutral Plan 2021-2030', Berkeley aims to reduce the embodied carbon of all developments, by designing smarter and more efficient buildings. Reducing the use of concrete (and consequently cement) will have a positive result on lowering embodied carbon. Therefore, the associated Reserved Matters Application for Plots D and K only proposes parking at ground level and half a basement level with the relevant Parameter plan being revised accordingly, along with the access to the ground level parking being moved from the east to the north of Plot D, resulting in improvements to the setting of the Grade II Listed West Laboratory Building.

In relation to Use Classes, this S.96a application includes changes to the description of development on the Outline Planning Permission, given that the Use Class Order was updated in 2020 and Permission does not currently reflect this.

The proposal is to update Use Classes in the description of development to remove A1/A2/A3/A4/B1/D1 and replace with Use Classes E, F.1 and F.2 and drinking establishment (Sui generis), as per the Use Class Order 2020. These changes are consistent with the previous approved uses, save for the addition of a gym facility.

However, as part of the public consultation process ahead of submission, key and consistent public feedback was that an additional gym facility should be included in Plot D, and this proposed update to the description of development would enable this to come forward under the new Use Classes Order. In addition, there are already sufficient conditions on the Outline Planning Permission (namely 39, 42 and 43 on matters such as Noise and Vibration, Sound Insulation and Hours of Use for Commercial Units) to control such a use to the extent that there would be no material impact on the existing Outline Permission.

The Applicant is also proposing to restrict a gym use to the commercial Buildings in D3 and D5 and, as such, an additional condition can be added to the Outline Planning Permission to this effect.

Therefore, the following change to the S.73 Outline Planning Permission description of development is proposed (with text to be removed struck out and replacement text underlined):

***“S73 Variation application in respect of planning permission reference 13/0117/O being an Outline Planning Permission for mixed development comprising 2.032 units and 2.442 (GEA) sqm of non-residential floor space (~~A1/A2/A3/A4/B1/D1 Use Class E, F.1, F.2 and drinking establishment (sui generis)~~), access, landscaping, public accessible open space, car and cycle parking provision and refuse and recycling storage areas.”***

The proposed changes result in minor alterations to the approved Parameter Plans and, given the scale and nature of the approved Waterfront Masterplan, it is considered that the proposed amendments to the parameters do not materially alter the overall Outline Permission.

### Proposed Amendments

The amendments to the Parameter Plans proposed as part of this S.96a submission enable the submission of the Reserved Matters Application for The Ropeyards, Plots D and K, at Royal Arsenal Riverside.

The changes proposed are listed below, along with our proposed description of development for this S.96a Non-Material Amendment Application:

*“An application submitted under Section 96a of the Town & Country Planning Act 1990 for a non-material amendment in connection with planning permission reference 16/3025/MA, dated 17.03.2017, to allow changes in relation to Plots D and K for the following:*

- *Increase height of the zones that contain Buildings 1, 2, 3 and 4 in Plot D and Buildings 3 4 in Plot K by 3m.*
- *Increase height of the zone that contains Building 5 in Plot K by 3.5m.*
- *Increase height of the setback along Duke of Wellington Avenue of the zones that contains Buildings 1 and 2 in Plot D by 3 metres.*
- *Removing the setback along Beresford Street of the zones that contain Buildings 3 4 in Plot K.*
- *Removal of the link buildings between Buildings D1-D2 and D4-D5.*
- *Creation of a small separation between Building D1 and D5.*
- *Minor modifications of the footprint of Plots D and K.*
- *Update Use Classes to remove A1/A2/A3/A4/B1/D1 and replace with Use Classes E, F.1 and F.2 and drinking establishment (Sui generis), as per the Use Class Order 2020.*
- *Alterations to the Secondary Road and Service / Maintenance Route.*
- *The vehicular entrance into Plot D moved from the east to the north side.*
- *Changes to the parking area in Plot D. “*

### Submission

A Design Note, prepared by PRP Architects, accompanies this S.96a submission and provides further details on the changes proposed. Assessment and justification of the proposed changes to the parameter plans is set out below.

Given the original Outline Permission included an Environmental Impact Assessment (EIA), an ES Addendum to this has been submitted given that the need for any new EIA was screened out as confirmed by the Council's Screening Opinion dated 5<sup>th</sup> January 2024 (Ref: 23/3844/EIA).

As per our pre-application discussions regarding the necessary documents for this submission, please find enclosed the following for your consideration:

- Application Form;
- Approved Parameter Plans;
- Replacement Parameter Plans– (see Appendix 1 for comparison);
- Design Note;
- Environmental Statement Addendum;
- Flood Risk – Technical Note; and
- Transport – Technical Note.

Given that this S.96a Application relates to the S.73 Outline Planning Permission for the Waterfront Masterplan at Royal Arsenal Riverside and Plots A and B are already occupied to a certain extent, there is a requirement to notify all landowners and leaseholders accordingly.

As such, please see Appendix 2 for a full list of all those notified and for reasons of privacy, we would suggest this list is not uploaded to the Council's website, but we will leave that to Officers discretion. A newspaper notice has also been placed in the Bromley/Bexley editions of the Newsshopper, which cover the Woolwich area, and this will be published on 13<sup>th</sup> March 2024.

In accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2023, as amended, a fee of £357, including service charge, has been paid by bank transfer via the Planning Portal.

We trust that the above provides you with sufficient information and we would be grateful for confirmation of receipt. In the meantime, if you have any queries or require any further information, please do not hesitate to contact the writer or Pete Tanner, at this office.

Yours sincerely,



**PLANNING DIRECTOR**

**STANTEC UK LIMITED**

## APPENDIX 1 – PLANS COMPARISON

No.	Drawing Title	Approved PlanNo.	Proposed Replacement PlanNo.
1	Ownership Boundary	434_05_M_07_100 Rev P1	Unchanged
2	Planning Application Boundary	434_05_M_07_101 Rev P1	Unchanged
3	Existing Site Sections AA and BB	434_05_M_07_102 Rev P1	Unchanged
4	Existing Site Sections CC and DD	434_05_M_07_103 Rev P1	Unchanged
5	Demolition Plan	434_05_M_07_104 Rev P1	Unchanged
6	Building Plots	116 -P3010 Rev 01	Z429-PRP01-STW-ZZ-DR-A-880-900
7	Basement 2 – Car Park and Ancillary Spaces	116 -P3016 Rev 01	Unchanged
8	Basement – Car Park and Ancillary Spaces	116 -P3017 Rev 01	Z429-PRP01-STW-ZZ-DR-A-880-904
9	Lower Ground and Ground Floor – Car Park and Ancillary Spaces	116 -P3018 Rev 01	Unchanged
10	Proposed Maximum Heights Plan	116 -P3011 Rev 01	Z429-PRP01-STW-ZZ-DR-A-880-901
11	Proposed Minimum Heights Plan	116 -P3012 Rev 01	Z429-PRP01-STW-ZZ-DR-A-880-902
12	Proposed Access and Circulation Plan – Vehicular	116 -P3013 Rev 01	Z429-PRP01-STW-ZZ-DR-A-880-903
13	Proposed Access and Circulation Plan – Pedestrian and Cycle Routes	434_05_M_07_111 Rev P1	Unchanged
14	Proposed Phasing Plan – Over Ground	116 -P3014 Rev 01	Unchanged
15	Proposed Phasing Plan – Basements and Podium	116 -P3015 Rev 01	Unchanged