

29 January 2019

VIP Trading Estate and VIP Industrial Estate, Charlton

in the Royal Borough of Greenwich

planning application no. 16/4008/F

This addendum sets out various factual updates, clarifications and corrections which need to be considered in conjunction with the Representation Hearing Report originally published on 21 January 2019 (GLA ref: GLA/3800/03).

Details of the proposal

Paragraph 18 – the application was submitted to, and validated by Greenwich Council in December 2016, not January 2017.

Re-consultation exercise

Paragraph 71 – it should be correctly noted that Len Duvall is London Assembly Member for Greenwich and Lewisham.

Paragraph 77 – it should be noted that the representations submitted on behalf of the Central Charlton Resident's Association (CCRA) were incorrectly summarised under the objections summarised under paragraph 70. The following representations should be noted under the representations made by amenity groups.

Central Charlton Residents Association (CCRA): raised objections to the proposals and dissatisfaction with the timing and extent of the public viewing carried out in 12 and 13 January 2019. Objections were raised to the design and visual experience in that it does not reflect the maritime heritage of Charlton Riverside and with the proposed height and density which exceeds the 3 to 6 storey height guidance in the Charlton Riverside SPD. CCRA urged GLA officers to reject or defer the proposals.

Following publication of the Representation Hearing Report **an additional representation** was received from a local resident reiterating concerns previously raised with regards to the proposed level of family housing (16%) against the borough-wide Local Plan target and SPD guidance of 50%. Concerns were also raised with regards to the proposed scale and density and the potential for the proposals to set a precedent for the development of the masterplan area. The representations request that a re-design of Plot A is pursued through the proposed phasing of the development.

The additional representations outlined above, do not raise any new planning issues that have not been addressed within the material planning considerations section of the Hearing Report.

Affordable housing

Paragraph 119 – as set out within the affordable housing assessment, should grant funding not be forthcoming to deliver the 40% affordable housing offer, a fall-back position of 35% (by habitable room) will be secured within the section 106 agreement. For clarification this would comprise 162

London Affordable Rented (LAR) units and 88 intermediate shared ownership units, this equates to a tenure split of 70% LAR and 30% intermediate. The following table sets out the detailed fall-back position.

affordable units	number of units	number of hab. room	% by unit	% by hab. room
London Affordable Rent	162	514	64.8	70.1
Shared ownership	88	219	35.2	29.9
total (% of scheme)	32%	35%	-	-

Table 1: Fall-back affordable housing offer should grant funding not be forthcoming.

Heritage

Paragraph 195 – The following sentence should be added to the beginning of this paragraph:

“Case law tells us that any harm to the significance of a designated heritage asset must be given considerable importance and weight and that there is a strong presumption against granting planning permission for development which would harm the character or appearance of a conservation area.”

Daylight and sunlight

Paragraph 237 – states *“The remaining window would retain VSC levels of 22.1%, which is marginally above the suggested 20% target”*. This should be corrected to clarify that the retained VSC value with the proposal in place is 22.1%, however the percentage reduction is 20.5%, which is marginally above the BRE reduction target of 20%.

Paragraph 238 – with regards to the 12 windows at 1-8 Anchor and Hope Lane, the report states that would experience minor adverse effects in the range of a 25% reduction. For clarification purposes, the reductions range between 21.6-28.3%. This ranges is still within the range to be considered a minor adverse effect and does not alter the assessment set out in the report.

Paragraph 243 – as set out within the Hearing Report, it was not considered necessary to assess the daylight and sunlight impacts to Imex House, as commercial uses are less sensitive to daylight and sunlight reductions than residential receptors. This is in line with industry practice. Notwithstanding, at the request of GLA officers, in light of the representations made during the re-consultation, the applicant has since carried out an analysis based on reasonable assumptions, considering the rooms facing the site are of single aspect.

With regards to daylight, the results suggest that that each window will retain a VSC in excess of 17.2% with the proposed buildings constructed. As set out in paragraph 227 of the Hearing Report, considering that retained VSC values in the mid-teens are deemed acceptable in an urban context, the level of daylight this property receives is considered adequate for a commercial building. The NSC assessment demonstrates full compliance with BRE guidelines, although it should be noted that assumed layouts have been used. In terms of sunlight, the APSH test shows that all windows within this building would be compliant with the suggestions of the BRE guidelines with the proposal in place.

Overall, the results of this assessment, indicate that the retained levels of daylight and sunlight to this property with the proposal in place would be considered acceptable within an urban context.

Conclusion

Paragraph 365 – should be deleted.

~~Taking the development plan as a whole, it is considered that the proposals accord overall with the development plan and it is not considered that there are any material considerations indicating that the proposal should be refused, notwithstanding its overall compliance with the development plan. Accordingly, the recommendations set out at the beginning of this report are proposed.~~

Agent of change – Imex House

As set out within the Hearing Report (paragraphs 243, 247 and 308), representations have been made by the freehold owner of Imex House and surrounding land. These raise concerns with regards to the potential impact of the proposals on the existing unrestricted access arrangements, the noise impacts from the construction phase on the ability to use the rehearsal and recording studios, the requirement to provide additional soundproofing to safeguard the use of these facilities against the introduction of sensitive residential receptors, and the impact that the proposed height and scale in proximity to the existing building would have on daylight and sunlight. It has also been requested that the applicant cover the costs of the use of alternative studios during the construction process. Additional clarifications were also sought with regards to the restriction of other parking rights that could block access and protection of the physical structure of the premises during construction. The representation also state that limited engagement has been attempted by the applicant to address these outstanding concerns.

The applicant has shared a copy of correspondence issued to the freehold owners of Imex House prior to the Council's Planning Board meeting, clarifying the access arrangements that will be maintained and this issue, and those with regards to soundproofing, have been addressed within the Hearing Report (paragraph 247). The daylight and sunlight impacts have been addressed in the above paragraphs and all proposed car parking will be provided off street for future residents. The only parking on the access road will be related to temporary refuse collection. It is considered that through the noise surveys to be secured by condition and use of notices under Section 61 of the Control of Pollution Act 1974, in addition to the obligation to provide soundproofing should it be deemed necessary following surveys, that it will not be necessary to seek alternative studio facilities. On this basis, GLA officers are satisfied that the proposals have been designed to take account of the existing commercial operations at Imex House and through the provisions to be secured by planning condition and/or obligation, will allow them to continue without being impacted to unacceptable degree.

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