



HOUSE OF COMMONS

LONDON SW1A 0AA

Pippa Hack
Director of Regeneration, Enterprise and Skills
Royal Borough of Greenwich
35 Wellington Street
Woolwich
London
SE18 6HQ

April 2017

Dear Pippa,

I am writing to register my formal objection to revised planning application **16/4008/F**, submitted by Leopard Guernsey Anchor Propco Ltd for the erection of 11 buildings ranging from 2 to 10 storeys in height (771 Class C3 residential use units and ancillary commercial accommodation) on the V I P Trading Estate and the V I P Industrial Estate sites, Anchor and Hope Lane, Charlton, SE7.

Before setting out my grounds for objection to the revised application in question, I want to make clear that I recognise the considerable progress that has been made since the applicant submitted plans in December 2016 for the erection of nine buildings ranging from 2 to 28 storeys in height (975 Class C3 residential use units) with just 13 per cent of the total units proposed to be affordable. The Royal Borough of Greenwich deserves credit for making clear that this initial application, submitted prior to the adoption of the 2017 Charlton Riverside Masterplan SPD, was entirely inappropriate and for the efforts that have been made to negotiate amendments to it.

However, the revised application that was submitted on 22 December 2017 still falls short of the kind of development proposal that is needed to ensure that the vision for Charlton Riverside as an exemplary new urban district is realised. I am objecting to it on the following grounds:

Height and massing

The 2017 Charlton Riverside Masterplan SPD made clear that incoming residential development should be characterised mainly by low-to-medium rise housing, typically at 3-6 storeys in height, with scope for buildings up to 10 storeys in certain locations.

I note that the applicant has significantly reduced the height of a number of the taller buildings proposed in their December 2016 submission. I also appreciate that the applicant has responded to one of the concerns raised by the Derrick and Atlas Gardens Residents' Association (DAGRA) and has reduced the scale of proposed Building H sited to the immediate east of the existing homes on Atlas and Derrick Gardens by 2-storeys (albeit by redistributing the 20 units to three other residential buildings, Buildings C, E and F, in the scheme).

Matthew Pennycook MP

Member of Parliament for Greenwich and Woolwich

Telephone: 020 7219 6280 Email: matthew.pennycook.mp@parliament.uk

Website: www.matthewpennycook.com



However, the revised application still proposes an unacceptable number of buildings that are greater than 6 storeys in height. As you are aware, the revised application still includes:

- Five 10-storey buildings;
- Three 9-storey buildings;
- One 8-storey building;
- And one 7-storey building.

In proposing a total of 10 buildings which are greater than 6 storeys in height, the revised application is clearly at odds with the 2017 Charlton Riverside Masterplan SPD which makes clear that such buildings are to be the exception rather than the norm.

Moreover, the 2017 Charlton Riverside Masterplan SPD makes clear that while buildings over 6 storeys in height may be considered appropriate in some locations (e.g. the lower section of Anchor and Hope Lane toward the Woolwich Road/Charlton Station), a notional maximum building height in any given location does not mean that all buildings in that location should seek to achieve the height in question. Yet, in both Plots (A and B) on the site, the revised application proposes clusters of tall buildings at approximately similar heights. For example, three 10-storey buildings and one 7-storey building are proposed for Plot B bounded by Anchor and Hope Lane to the west and Atlas Gardens to the north. Similarly, the row of buildings at the far eastern edge of the site on Plot A, adjacent to Stone Foundries, comprises of two 10-storey buildings and one 9-storey building. This clustering of tall buildings at approximately similar heights represents an overdevelopment of the site that will create overly dense massing. There is simply not enough variation in height within and between individual development blocks as called for in the Masterplan SPD.

Design

Despite the obvious attempt to inject a degree of variation across the site by means of staggering across both plots and setting individual blocks at different heights in the three rows of buildings on Plot A, the revised application is predominantly characterised by an over-conformity in building design. I fear this over-conformity will create a monotonous and sterile environment that will exacerbate the feeling of overdevelopment and overcrowding produced by the linear continuation of dense, tall block structures and the resulting canyon effect.

Affordability and housing mix

While I recognise that the proposed tenure mix (70% social rented/30% intermediate) is in accordance with policy H3 of the Core Strategy, the overall level of affordable housing is contrary to that same policy which designates that at least 35 per cent of units on new developments be affordable. Of a total of 771 homes, policy H3 would suggest that a minimum of 270 be affordable (189 social rented and 81 intermediate). Instead, of the 771 homes proposed, the applicant proposes that just 25% (by unit) and 26% (by habitable room) be affordable on the basis of a Financial Viability Assessment that makes clear the developer will secure a target return of 18% profit on Gross Development Value (GDV).

The revised application is also seriously deficient with respect to housing mix. Policy H2 of the Borough's Core Strategy makes clear that a range of housing types and sizes are required in all developments. However, with just 126 of the proposed 771 units designated as three or more bedroom units, the application fails to cater to the need for family size homes and falls well below the recommended level of 51.2 per cent. In doing so, the revised application is again clearly at odds with the 2017 Charlton Riverside Masterplan SPD which makes clear that incoming residential development should be characterised by a



significant quantum of family housing and sets out a vision for a “residentially diverse neighbourhood, with a high proportion of family homes”.

Parking

The car parking proposed in the revised application is at a ratio of 0.27 spaces per unit. As such, it is below the maximum standards set out in the London Plan which allows for up to 1.5 spaces per dwelling in areas, such as this site, where the public transport accessibility level (PTAL) rating ranges from 2 to 4. That said, a car parking ratio of 0.27 spaces per unit is, in my view, too high for a site that is situated in an area where traffic congestion and significant pressures on parking already pose an acute problem.

Conclusion

If approved, this application would authorise the first major development within the Charlton Riverside Masterplan area and would set a clear precedent for all other developments that will follow. That is why it is critical that we get it right.

Sadly, the revised application falls short of the kind of development proposal that is needed to ensure that the vision for Charlton Riverside as an exemplary new urban district is realised. The overall level of affordable housing and the dwelling mix within that envelope are contrary to the policies set out in the Core Strategy and the height, massing and design do not comply with the vision set out in the 2017 Charlton Riverside Masterplan SPD.

I warmly welcomed the 2017 Charlton Riverside Masterplan SPD – a document whose development involved a considerable amount of time, effort and cost and one that benefited from extensive community consultation. I did so because it stressed that the development of Charlton Riverside required a very different approach to that taken in other parts of the Borough, such as the Greenwich Peninsula. Furthermore, it left no doubt that development on the Riverside had to be premised on a genuine mix of high-quality homes, including family homes, as well as education and employment space and decent public amenity. Yet, in far too many respects, this revised application is at odds with the spirit of that Masterplan SPD.

I continue to support development on Charlton Riverside, but the Planning Board should refuse this application and urge the applicant to bring forward further amendments that reduce the proposed massing and height, improve the proposed building design, and rethink the proposed levels of affordable and family housing even if doing so requires further reductions to the overall number of residential units or car parking spaces across the site.

Yours sincerely,

Matthew Pennycook MP

- cc. Cllr Denise Hyland, Leader
Cllr Danny Thorpe, Deputy Leader and Cabinet Member for Regeneration & Sustainability
Cllr Mark James, Chair – Planning Board
Cllr Ray Walker, Vice-Chair – Planning Board