

Planning Statement

The Antigallican 428 Woolwich Road, Charlton SE7 8SU



Executive Summary

The application seeks to deliver a high quality shared-living scheme within the Royal Borough of Greenwich. This application proposal scheme comprises the demolition of the existing 1 storey projection from the east elevation and construction of a 3-storey side extension including the construction of a roof extension and part change of use of ground floor to facilitate the provision of a mixed use development comprising of a Public House (Use Class Sui-Generis) at ground floor level and 49 no. shared living (HMO) units (sui generis use) across the upper floors and part of the ground floor.

The proposed shared-living use is considered acceptable and appropriate within this location, and has been designed to the highest quality and will award a currently neglected, vacant property the opportunity to contribute positively aesthetically and economically to the local area. The retention and rejuvenation of the Public House has a clear social and economic benefit that the proposal will bring to the local community.

The design of the scheme has been meticulously considered under a previous application (App Ref: 18/2673/FUL) and been deemed appropriate and acceptable through the extant permission and in accordance with planning policy.

Overall, this high quality development will support and meet the local housing need and demand for this type of new type of housing within the Royal Borough of Greenwich and provide clear economic and social benefits.

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1. Introduction

This Planning Statement has been prepared on behalf of Gallican Investments Limited in respect of development proposals that require planning permission at The Antigallican, 428 Woolwich Road, Charlton SE7 8SU ('the site').

Planning permission is sought from the Royal Borough of Greenwich ('the Council') for:

'Change of Use from Hotel (Use Class C1) to a 49 shared living units HMO (Use Class Sui Generis), whilst retaining Public House at ground floor level (Use Class C4) as amendment to planning permission dated 29/05/2019 Ref: 18/2673/F for Demolition of existing single storey projection from east elevation and construction of a 3-storey side extension and a rooftop extension.'

The Planning Statement is intended to provide an overview of the proposed development, describe the application proposals, site context, planning policy context, planning assessment and planning conditions & obligations. Herein, detailed consideration is given to the principle and the impact of the proposed development, assessed against relevant development plan policies and other material considerations.

This Planning Statement follows the below format:

- Section 2 – Application Proposals
- Section 3 – Site Context
- Section 4 – Planning Policy Context
- Section 5 – Planning Assessment
- Section 6 – Planning Conditions and Obligations
- Section 7 – Summary and Conclusions



The Antigallican Public House (Source: www.kayak.co.uk)

1.1. Gallican Investments Limited

Gallican Investments Limited's approach to shared living aims to address the key challenges of today's urban living. The way we live is changing. Urban accommodation in the 21st century is no longer about static housing or climbing the traditional 'property ladder' model, that has grown out of balance with current social-economic norms. Even the supposedly more flexible rental market offers high barriers to entry, and a poor value proposition.

Our needs go beyond these pedestrian concepts. What we seek now is convenience and amenities on our doorstep, in exchange for a smaller private space, combined with community that can provide the physical, human connections modern living often sacrifices in favour of increasing digital and virtual connectivity. Gallican Investments Limited strive to create and set new standards for urban living, and make it accessible, without compromising on quality or flexibility.

The target audience are sociable people seeking an innovative home and way of living, and a community that offers access to shared experience, the product is mostly sought by age category 30-45yrs +-5yrs. The aim is to make luxurious living available at a price previously perceived by our residents as unattainable.

In summary, the aim is to create a shared-living hub, thoughtfully designed to meet the needs of residents and welcoming for the local community. We consider that the proposal within this planning application demonstrates this, along with further detailed matters to ensure that the design is detailed and comprehensive.

1.2. Application Submission Content

The planning application material which accompanies the planning application is set out below:

- Completed Application Form and Certificate A – Gallican Investments Limited
- Community Infrastructure Levy Additional Information Form – Gallican Investments Limited
- Planning Statement - Savills
- Design and Access Statement – Gallican Investments Limited
- Daylight, Sunlight and Overshadowing Assessment – Syntegra Ltd
- Air Quality Assessment – Syntegra Ltd
- Noise Impact Assessment – Syntegra Ltd
- Energy Strategy Report – Syntegra Ltd
- Flood Risk Assessment – Ambiantal Environmental Assessment

1.3. List of Plans and Drawings

The application submission includes the following architectural plans and drawings:

- 01 Location Plan Rev A
- 02 Existing Site Plan
- 03 Existing Floor Plans
- 04 Existing Elevations
- 05 Proposed Site Plan
- 06 Proposed Floor Plans
- 07 Proposed Elevations and Sections
- 08 Proposed Design and Access Statement
- 09 Planning Statement
- 10 CIL Form
- 11 Daylight and Sunlight Assessment
- 12 Noise Impact Assessment
- 13 Flood Risk Assessment
- 14 Air Quality Assessment
- 15 Energy Strategy Report
- 16 Operation and Management Plan
- 17 Response to Covid19 Statement
- 18 S106 Statement

Application Proposals

In this section, we outline the application proposals and summarise the key features. Further consideration of these issues is given with the Planning Assessment section of this statement.

1.4. Description of Proposals

The proposals at the site include:

'Change of Use from Hotel (Use Class C1) to a 49 shared living units HMO (Use Class Sui Generis), whilst retaining Public House at ground floor level (Use Class C4) as amendment to planning permission dated 29/05/2019 Ref: 18/2673/F for Demolition of existing single storey projection from east elevation and construction of a 3-storey side extension and a rooftop extension.'

1.4.1. Land Use

The existing building on the site comprises a public house (Sui generis) and hotel (Use Class C1) which ceased operation in 2018. Since then, the building has been vacant and is falling into a state of disrepair. The proposal seeks to revitalise the prominent locally listed building through the extension and refurbishment of the site to provide a mixed use shared-living scheme, comprising Public House (Use Class sui generis) at ground floor level and 49 shared-living (HMO) units across the upper floors and part of the ground floor. The shared living (HMO) units are designed to provide accommodation for occupation of between 6 months up to 1 year.

1.4.2. Design

The design of the scheme has been carefully considered and designed in line with the Council's advice to protect and enhance the locally listed building and to establish an appropriate scheme that responds to the local context, but also delivers the practical needs of the development.

The proposed elevations have been based on the rhythms and architectural hierarchies found in the facades of the original building. The overall aperture sizes of the existing windows have been carried through into the new building in the same vertical hierarchy in order to establish a sense of harmony across the development. The proposal's architectural offer is enriched through the 'mirroring' of the existing façade onto Woolwich Road, in order that the hotel entrance becomes a central. Whilst some may say that this will obscure the division between new and old it will add prominence to the hotel entrance, and reflect the elevation facing Charlton Church Lane.

1.4.3. Car and Cycle Parking

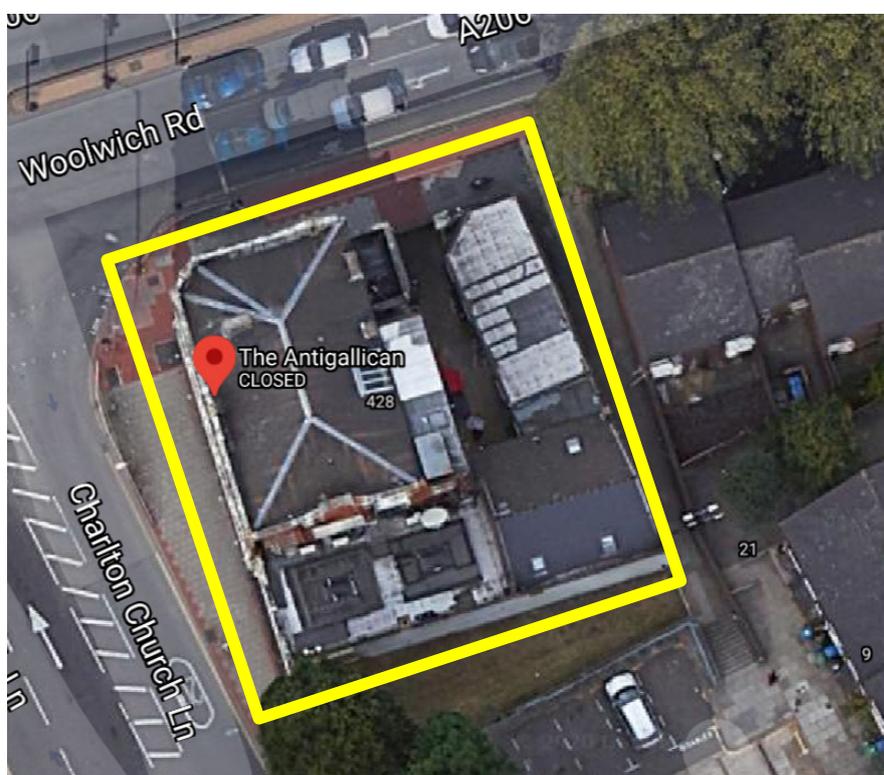
To ensure that the development is as sustainable as possible, the development will be car-free. An accessible parking bay is to be provided. Cycle parking and storage, will be provided at basement level relate solely to the shared-living units. The cycle parking provision is in accordance with the emerging New London Plan standards.

2. Site and Context

2.1. The Application Site

The site is a broadly square shape and comprises The Antigallican, a three-storey former public house and hotel. The Antigallican is situated at the junction between Woolwich Road (A206) and Charlton Church Lane. Woolwich road is busy arterial road with dual lanes running East/West.

The main building of the existing public house extends to three storeys with basement. The bar and hotel reception are located on the ground floor, with hotel rooms on the first and second floor. The main building is internally connected to the southern elevation of the public house and continues eastward to the courtyard, this extension is one storey within the south west corner of the site and was used as a function room connected to the bar historically. The south east corner of the site extension accommodates hotel rooms across two floors, to the east the extension accommodates hotel rooms across a single storey.



The currently vacant bar is accessed from the corner of Charlton Church Lane and Woolwich Road. The hotel is accessed through a separate entrance from Woolwich Road which leads to a reception area and stairwell. The hotel accommodation comprises 23 rooms across three-storeys;

- Ground floor: 6 no. ensuite rooms and 1 no. suite;
- First floor: 4 no. ensuite rooms and 5 no. rooms, communal bathroom; and
- Second floor: 2 no. ensuite rooms and 5 no. rooms, communal bathroom and communal kitchen/utility room.

The Antigallican is locally listed by the Royal Greenwich, however, the site is not located within or adjacent to a conservation area. The site is located with Flood Zone 3 in an area benefiting from flood defences, Government guidance states that within this designated flood zone there is a high probability of flooding without local flood defences. Flooding defences protect the area against a river flood with a 1% chance of happening each year, or a flood from the sea with a 0.5% chance of happening each year.

The site is considered accessible and benefits from sustainable public transport links, with a PTAL rating of 5. This is mostly due to the Charlton Railway Station being just 100m to the south of the site in addition to various bus stops in close proximity such as Charlton Station Woolwich Road.

2.2. Surrounding Area

The southern surrounding area predominantly comprises residential uses to the along Woolwich Road ranging between two or three storey dwellings of terraces and flatted development constructed with red brick. Existing development at Barney Close is directly adjacent to the site and extends to three storeys. Southeast to the site is Charlton Athletic Club. The site is also well accommodated by local convince stores such as Sainsbury's Local along Charlton Church Lane. To the northern side of Woolwich Road, the land use is largely industrial and commercial in character.

It should also be noted that there are no statutorily listed buildings in the immediate surrounding area. The topography of the area is mainly flat on the east/west axis, however, there is a slight downward slope towards Woolwich Road from the south.

3. Planning History

This section of the Planning Statement seeks to summarise the relevant planning history for the application site.

3.1. Extant Planning Permission

The application site benefits from an extant planning permission (**18/2673/F**, granted 29 May 2019) for the *“Demolition of the existing 1 storey projection from the east elevation and construction of a 3-storey side extension including the construction of a roof extension and part change of use of ground floor to facilitate the provision of a mixed use development comprising of a Public House (Use Class A4) at ground floor level and a 60 bedroom hotel (Use Class C1) across the upper floors and part of the ground floor.”*

The extant permission has not been implemented and due to the lack of viability of a hotel scheme in this location, the applicant now seeks a change the use to include 49 shared-living rooms. This application mirrors the physical extension works previously approved with the only difference being to the use for shared-living (HMO) not hotel use.

The extant planning permission provides context to assess this latest application scheme for the site. As noted above, the different use now proposed means that a new approach to the internal layout has been adopted albeit referencing clear established principles from the extant permission that are recognised and accepted.

A planning history review has been undertaken using the Councils online system. The planning history relating to the site is recorded below:

Planning ref	Description	Decision	Date
15/2272/F	Construction of a 2-storey side extension, enlargement of basement and conversion of existing hotel and part of public house into 8 self-contained flats and 2 additional commercial units (Retail Unit and Gymnasium). RECONSULTATION - REVISED PLANS	Granted	29/08/2017
18/2673/F	Demolition of the existing 1 storey projection from the east elevation and construction of a 3-storey side extension including the construction of a roof extension and part change of use of ground floor to facilitate the provision of a mixed use development comprising of a Public House (Use Class A4) at ground floor level and a 60 bedroom hotel (Use Class C1) across the upper floors and part of the ground floor.	Granted	29/05/2019

The above planning history demonstrate that the principle of additional hotel and transient sui-generis uses on the existing property are deemed acceptable and appropriate in this location in principle. These permissions are a material consideration, the proposal brought forward intends to utilise the same footprint and massing of the most recent planning permission.

4. Planning Policy Context

4.1. National Planning Policy Framework (NPPF)

Planning law requires that where regard is to be had to the development plan for the purpose of any determination made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise¹.

In assessing and determining development proposals, the National Planning Policy Framework 2019 ('NPPF') states that local planning authorities should apply a presumption in favour of sustainable development. Where the development proposals accord with up-to-date development plan policies they should be approved without delay or where the development plan is absent, silent or out-of-date, planning permission should be granted unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 91 (criterion a) states planning decisions should *“promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages”*.

Paragraph 92 states planning decisions should plan positively for the provision of shared spaces, community facilities and local services to enhance the sustainability of communities and residential environments.

Paragraph 117 states, *“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.”*

Paragraph 118 (Criterion d) seeks to, *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained...”*.

Paragraph 17 states decisions should ensure that developments:

- a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

¹ Section 38(6) of the Planning & Compulsory Purchase Act and Section 70(2) of the Town and Country Planning Act 1990

- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

Paragraph 128 states *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

Paragraph 189 states *‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*

4.2. The Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

The Statutory Development Plan includes the London Plan (as amended) together with The Royal Greenwich Local Plan: Core Strategy adopted July 2014.

4.2.1. Draft New London Plan

A draft 'Intend to Publish' version of the new London Plan was published in 2020. Following 'Examination in Public' between Jan-May 2019, the Panel of Inspectors appointed by the Secretary of State issued their report and 55 recommendations. In response, on 9 December 2019, the Mayor issued the revised 'Intend to Publish' version of the London Plan to the Secretary of State, reducing the plan's ten-year housing target by almost 20% from 649,350 to 522,850, and more than halving the Plan's target for small sites, from 245,730 to 119,250.

In a letter dated 13 March 2020, the Secretary of State directed the Mayor to work constructively with London boroughs to encourage more housing delivery and to make several modifications to the new London Plan to bring it in line with the NPPF.

Under the GLA Act 1999, the Plan has to be approved by the Secretary of State before it can be adopted.

In December 2020 there are new directions for the Mayor to consider that could stall the adoption of the Plan. Once the wording is agreed, our understanding is that adoption would still take at least a further two months for formalities to take place. It is also our understanding that the GLA is intending to publish a note on the recent revisions to the Use Class Order, but that it does not consider that the use class revisions require changes to be made to the draft Plan itself.

However, given the advanced stage of its preparation, the draft new London Plan is treated as holding significant weight in the determination of planning applications.

All of the relevant polices are thoroughly assessed within the Planning Assessment section of this report.

5. Planning Assessment

5.1. Principle of Development

The existing building on site comprises a vacant three storey plus basement public house (Class Use Sui-Generis) with a 23 room hotel accommodation (Class Use C1) at ground, first and second floor level. A single storey extension is located to the southern elevation and wraps around a small courtyard in a 'L shape' to include a number of outbuildings which were previously converted to hotel suites. The property has been vacant since early 2018.

5.1.1. Shared-living

Increasing the current housing stock is an important strategic objective supported by London Plan policies 3.3 and 3.4 which aim to ensure that development proposals achieve the maximum intensity of use compatible with local context. The draft London Plan identifying a 10year target of 28,240 net housing completions between 2020 – 2029 whereas Core Strategy Policy H1 identifies the policy objective to deliver 38,985 net additional homes in Greenwich between 2013 and 2026.

The overarching principle for development in Royal Greenwich include the need to deliver homes which are affordable, accessible and meet their occupier's needs as well as promoting job creation and business growth. Royal Greenwich is already experiencing an existing shortage of appropriate housing.

In line with the NPPF, London Plan policies adopted and in draft and Policy H1 the proposed development will deliver 49 shared-living rooms, making a valuable contribution to new housing in Royal Greenwich in the form of a new housing typology. The clients shared-living product is high quality in nature, and provides well-sized rooms. The standard rooms (49 in total) will all be 16-22 sqm. in size, with a floor to ceiling height of 2.6-2.9m. The accessible units (5 in total) will all be up to 20-22sqm, in size, with a floor to ceiling height of 2.6-2.9m. Shared-living offers an alternative innovative means of accommodation which is complementary to more traditional housing, bringing diversity to the borough and enabling the retention of key workers, young residents and professionals in London. Not only will the scheme deliver new and exciting homes to Royal Greenwich, it will also help to release family homes back into the open market which are currently occupied by renters.

The addition of a four storey extension will offer an opportunity for comprehensive development of the site, whilst maximising the use of the site, in accordance with the objectives of the NPPF. Further, the site sits just outside the Charlton Riverside boundary which is a Strategic Development Location (Policy EA2) and the site is located within a Neighbourhood and Local Centre area and on a key gateway in future years. The proposal will positively contribute to a new neighbourhood centre by offering a high standard of accommodation and community facility which is a key objective of the Charlton Riverside redevelopment.

5.1.2. Public House:

As outlined in the draft London Plan 2019, Policy HC7 (Protecting Public Houses) and reflecting the objectives from the London Plan, Policy EA(b) supports the retention of pubs that have a community role. Under the previous application, 18/2673/F, a minor reduction in floorspace of the public house (7sqm) from 85sqm to 78sqm was not considered to impact on the viability of the public house. There are no proposed changes to the floorspace to that approved under application 18/2673/F. Indeed, the retention of the pub and the provision of shared-living housing will ensure the public house will continue to play an important social role offering residents a meeting place for food, drink, functions and entertainment whilst also ensuring the pub is accessible to the general public and remains a core facility for the local community. The redevelopment of the hotel into shared-living accommodation will revitalise the operation and viability of the public house once again.

5.2. Heritage Impact Assessment

The NPPF seeks to conserve and enhance the historic environment whilst ensuring that new development makes a positive contribution to local character and distinctiveness. Policy DH3 states that the Royal Borough will, inter alia, give substantial weight to protecting and conserving locally listed buildings. Policy DH(j) of the Core strategy states that in considering proposals affecting buildings on the Local List of Buildings of Architectural or Historic Interest, substantial weight will be given to protecting and conserving the particular characteristics that account for their designation.

The Antigallican is a locally listed building and described as a *'three storey building in red brick with stone dressings; hipped slated roof; red brick chimney with stone cappings. Single-storey extension with glass lantern light. Ground floor has large windows with small panes; granite plinth. Date circa 1900.'*

The proposed development is considered to be a high quality design that progressed through discussions with the Council under the previous App Ref: 18/2673/F application and reflect an agreed design position. No changes are proposed under this application and remains entirely the same as the design approved under App Ref: 18/2673/F. Indeed, the Delegated Officer's Report from App Ref: 18/2673/F stated *'overall, it is considered that the special character of the locally listed building would be maintained as well as the character of the area and the proposal would comply with the stated policies.'*

The proposal therefore is considered to be in accordance with Policy DH3 and Policy DH(j) by successfully resulting in sympathetic extensions and alterations to the locally listed building.

5.3. Design

The NPPF seeks to promote good quality living through design and sustainable environments and conserve and enhance the historic environment. Policy 7.4 of the London Plan and Core Strategy Policy DH1, state that all developments should provide a positive relationship with the existing urban context by respecting the established layout and spatial character as well as the scale, height, bulk and massing of adjacent townscape. Whilst Policy D4 of the draft London Plan states that all development must make the best use of land by following a design led approach that optimises the capacity of sites.

The proposed development is consistent with the extensions and external alterations previously approved under App Ref: 18/2673/F. No new external modifications are proposed. The detailed design of the scheme was developed to ensure that it responds positively to the surrounding context and creates a high quality appearance that is appealing for existing and future residents. Further design details are outlined in the Design and Access Statement submitted as part of this planning application.

As stated in the Officers Delegated Report (App Ref: 18/2673/F) *‘the proposed extensions have been designed to match the bulk and scale of the existing building, and to not appear incongruous...This design is considered to be well integrated into the traditional facade and is supported...The use of high quality bricks and textured banding will create interest to the modern facades without detracting from the detailed public house. The proposed fourth floor is setback so as not dominate the existing dwelling house...Overall, it is considered that the special character of the locally listed building would be maintained as well as the character of the area and the proposal would comply with the stated policies.’*

The development would result in significant investment and conservation of a landmark building worthy of preservation, which unfortunately has suffered from a lack of care and attention over the years. The extension and alterations to this building are well designed and have careful regard to the architecture of the existing property. The proposal is therefore considered to comply with the objectives of the NPPF, existing London Plan Policy 7.4, draft London Plan Policy D3 and Core Strategy Policy DH1.

5.4. Transport

Policy T1 of the draft London Plan states that all development should make the most of effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated. The objectives of this policy are supported by Policies IM4, IM(a), IM(b), IM(c) of the Core Strategy.

The proposed development will not result in a detrimental impact on the local highway network. The site has excellent public transport links and the site sits within a ‘PTAL 5’ accessibility rating. The site is some 130m from Charlton Station, which lies to the southwest; a 2 minute walk. The station is served by Thameslink and Southeastern Railway and sites within Travelcard Zone 3. The station offers rail services to London Bridge, Luton, St Pancras International, London Blackfriars, City Thameslink and Dartford to name a few.

There are bus stops located within a 200m walking distance of the site on the A206 and on Charlton Church Lane. The local bus stops create a link to a range of locations and includes evening and night services. The stops are served by the 161, 177, 180, 486 and N1 route services. Access to the site on foot is via Charlton Church Way or from the A206, Woolwich Road. Delineated crossing points for pedestrians are noted immediately adjacent to the property offering a safe crossing point on Charlton Church Road and across Woolwich Road.

Given that the site is within close proximity to bus services and railway and underground stations, it is not considered that the development will have a material impact on the public transport network and complies with development plan policies.

The site also sits within the Charlton controlled parking zone which restricts parking between 9.00am and 6.30pm Mondays to Saturdays. As outlined in Policy IM(c) development that is supported by a high level of public transport accessibility and within Controlled Parking Zones (CPZ) should be car free. This is supported by Draft London Plan Policy T6 which relates to car parking and states that developments within high PTAL's should be car free. As per the previous application (App Ref: 18/2673/FUL), the proposed development will be car permit free given the location within a PTAL 5 with excellent public transport links of both rail and bus routes and given the sites location within a CPZ.

To further encourage the use of sustainable modes of transport and in line with Policy IM(b) the proposal includes the provision of cycle storage within the basement of the building to serve the units.

The proposal is considered to be wholly acceptable in terms of highways, sustainable transport and parking.

5.5. Sustainability

The Energy Strategy Report prepared by Syntegra Ltd demonstrates sustainable design measures has been centre of the building design.

Policy E1 aims to reduce carbon emissions firstly by requiring all development to reduce demand for energy through design. Secondly by requiring all developments with a gross floor area greater than 500 sq. metres to connect to an existing decentralised energy network. Thirdly by supporting the incorporation of renewable energy generation within the development proposal. The Energy Strategy follows this 'fabric first' approach through the Be Lean, Be Clean and Be Green energy hierarchy to maximise reduction in energy through passive design measures in the first instance, before seeking opportunities to deliver energy efficiently, and finally maximising the provision of low and zero carbon technologies.

In line with the London Plan's three step energy hierarchy the regulated CO2 emissions for this development have been reduced by 38.17% over Building Regulation 2013 by undertaking the following:

Be Lean:

- U-values and air tightness better than Building Regulations Part L2A.
- Mechanical ventilation heat recovery unit for ventilation
- Low energy lights

Be Clean:

- No existing district heating networks within the close vicinity from this development. And, the CHP system is not feasible for this small development.

Be Green:

- High efficient Air Source Heat Pumps for heating and hot water demand
- PV panels of 12.92kWp on the roof (approximate 74 panels with 315 w/p are required).

In light of the Report conclusions, the proposed development is considered to be in accordance with Policy E1 of the Core Strategy.

5.6. Drainage and Flood Risk

Policy E2 of the Core Strategy states that the Royal Borough's Strategic Flood Risk Assessment must be used to inform development and reduce flood risk in Royal Greenwich.

Ambiental Environmental Assessment (AEA) have prepared a Flood Risk Assessment and is submitted as part of this planning application.

The EA Flood Map for Planning indicates that the proposed development site is located within tidal Flood Zone 3 and is within an area that benefits from flood defences. The existing site is considered to be "Less and More Vulnerable". The basement floor is used entirely for storage and is considered Less Vulnerable. However, as the ground floor contains a bar with a license to sell alcohol and as such is considered More Vulnerable. Further, the units proposed at ground floor level and those units proposed on the floors above are also considered to be More Vulnerable in accordance with the NPPF.

The potential of flood risk has been carefully examined in the Flood Risk Assessment and the findings are set out below:

- 'The site is considered to be generally at a low risk from all sources of flooding except for future tidal flood events; the EA website map and SFRA indicate the site is in Flood Zone 3a (High probability) but in an area which benefits from flood defences.
- The residential elements are categorised as "More Vulnerable" in accordance with the NPPF; it is therefore an appropriate type of development within Flood Zone 3a if the Exception Test can be passed.
- The proposed scheme can incorporate suitable flood resilient measures. All future tenants would have access to at least ground floor or safe refuge on upper levels above the 1 in 1000 year extreme flood level accommodating for climate change and evacuation is feasible with early warning available given the tidal flood risk.
- All guest rooms are to be set no lower than 6.202mAOD (312mm above the 1:200 year (2115 epoch) flood level).
- Demountable flood barriers are to be installed as a form of mitigation against the residual flood risk posed to parts of the ground floor (the bar and the corridor) that lie below the modelled flood level of 5.89mAOD;
- Refuge is not necessary on this site given the residual setting on the edge of FZ1 immediately adjacent to FZ1.
- Based on the likely flooding risk, it is considered that the proposed development can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere and is therefore appropriate development in accordance with the NPPF.
- It is recommended that the property signs up to the EA Flood Warning scheme.

Overall, the development is considered to be acceptable in both flood risk and drainage strategy terms, and therefore is compliant with Policy E2 of the Core Strategy, London Plan Policies 5.12 & 5.13, draft London Plan Policies SI12 and SI13 and the NPPF.

5.7. Impact on Neighbouring Amenities

5.7.1. Daylight, Sunlight and Overshadowing

Policy DH(b) of the Core Strategy relates to protection of amenity for adjacent occupiers, advises that new developments, extensions or renovations of buildings should 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.

The footprint of the built form was previously approved under App Ref: 18/2673/FUL. As previously stated, no changes are proposed to the building form or massing. As per the 2018 application, a Daylight, Sunlight and overshadowing report has been prepared by Syntegra Consulting and submitted in support of the application. The report provides an analysis of the impact of the development on the gardens and dwellings within the vicinity of the site. The report assesses the impact of the proposal on the buildings in close proximity to the site against the Building Research Establishment (BRE) report (BRE 209): "Site layout planning for daylight and sunlight: A guide to good practice" Second Edition (2011).

The report demonstrates that the levels of daylight at 11-13 Barney Close and at 2 Charlton Church Lane are not affected due to the proposed development, hence attaining the daylight criterion. Further, the report demonstrates that all windows of the surrounding buildings receive sufficient sunlight and that the existing amenity located at 13 Barney Close will not be adversely impacted by the proposed development. Overall, it can be concluded that the proposed development satisfies the BRE criteria for the daylight, sunlight and overshadowing. The proposed scheme is considered acceptable and in line with Policy 7.13 of the adopted London Plan and Policy DH(B) of the Core Strategy.

5.7.2. Outlook, Sense of Enclosure and Privacy from Neighbouring Properties

Policy DH(b) of the Core Strategy relates to the protection of amenity for adjacent occupiers.

As per the Delegated Officer's Report of App Ref: 18/2673/FUL it is not considered that *'the proposed dwelling would be visible from the front facade of Nos. 1-11 Barney Close. As the dwellings overlook the car park they are considered to retain a good outlook and the proposal would not create a sense of enclosure.'*

Further, the Delegated Report stated *'the front and rear facades of the flatted building, 13-23 Barney Close to the east of the site contains the majority of the sites windows. These would only have oblique views of the proposed development and as such it is not considered to create a sense of enclosure. The rear garden at the ground floor of the flatted building would have an increased sense of enclosure due to its proximity to the subject site. However due to the open character of the site to the south and east, the bulk is not considered to create an unacceptable loss of amenity. The proposal would impact the direct outlook of the third floor window on the eastern façade of No. 13-23 Barney Close. A three storey bulk in front of this building was established as acceptable by the approval of planning application 15/2272/F. The proposal would introduce an additional storey, however this would be setback from the side boundary by 800mm. As the fourth storey would be considerably above the height of the subject window, and setback, it would not be visible from the window and as such would not decrease the sense of outlook from the window, beyond the impact of the previously approved scheme.'*

Due to the arrangement of neighbouring windows, it was considered within the Officer's Delegated Report for the approved, App Ref: 18/2673/FUL, there was not an adverse impact on neighbouring properties in terms of loss of privacy. Given the transient nature of accommodation is similar to that approved in 2018, it is not considered that there would be a loss of privacy to neighbouring properties.

Therefore, a conclusion can be drawn that given the application makes no amendments to the footprint, form or massing of the building from the previously approved application, the proposal complies with Policy DH(b) of the Core Strategy.

5.7.3. Noise

Policy E(a) relates to the emission of noise and states 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.

In support of the planning application, a Noise Impact Assessment (NIA), prepared by Syntegra has been submitted. The NIA has been carried out of the present noise climate at 428 Woolwich Road, London, SE7 8SU and the impact of that noise on the proposed development and the impact of any potential plant noise on the surrounding environment. The assessment is based on the results of a noise measurement survey that has been carried out over a 24-hr period at the proposed development site and has considered the advice of local and national planning policy and best practice guidance.

A maximum specific sound level has been provided for any plant noise, which has been derived using the methodologies presented in BS 4142:2014, in order to achieve the requirements of the Local Authority. Once the precise plant specification has been determined, it is recommended that a detailed plant noise assessment is carried out to ensure compliance with the identified criteria. Overall, it has been shown that, through careful consideration of the building envelope construction and plant noise, the proposed development should avoid existing and future residents being exposed to harmful levels of noise. It can therefore be concluded that significant adverse impacts on the health or quality of life of those future residents would be avoided, in line with the aims of the NPPF and Policy E(a) of the Core Strategy.

5.7.4. Air Quality

An Air Quality Assessment has been prepared by Syntegra Ltd and is submitted as part of this planning application. Royal Greenwich has declared an Air Quality Management Area (AQMA) throughout the Borough due to exceedances of the annual mean Air Quality Standard (AQS) objective for nitrogen dioxide (NO₂) and the 24-hour mean AQS objective for PM₁₀. The development is located within the designated AQMA.

Policy E(c) of the Core Strategy relates to air pollution identifies that development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to minimise the impact of air pollutants are included. To ensure this development will not result any significant levels of harm, an Air Quality Assessment was undertaken where the following conclusions have been drawn:

- Construction phase impacts were deemed to be negligible as per the guidance in the Mayor of London's supplementary guidance on the control of construction dust emissions, providing the mitigation measures suggested in the guidance are adhered to.

- The results of the dispersion modelling assessment indicate predicted short-term concentrations of NO₂ are likely to be above the applicable 1-hour AQS objective on the ground level of the site as the predicted annual concentrations were above 60µg/m³. Both the ground level and first floor level have been categorised as APEC C.
- Predicted short term and PM₁₀ were not above the relevant long and short term AQS objectives at the site location. Levels were categorised as APEC-A in accordance with the London Councils Air Quality and Planning Guidance.
- The air quality neutral assessment indicated annual development NO_x energy emissions were assessed as being below the BEB. As such, the development is considered as air quality neutral with regards to building emissions and no further reduction measures or off-setting is required.
- The site is considered suitable for the proposed use from an air quality perspective with the application of the mitigation measures,

Therefore, the proposed development is considered to be in accordance with Policy E(a) of the Core Strategy, Policy 7.14 of the adopted London Plan and Policy SI of the draft London Plan and will not expose future users and neighbouring properties to elevated pollution levels during construction and operation phases.

6. Planning Conditions and Obligations

6.1. Planning Conditions

Paragraph 55 of the NPPF states that Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

The PPG notes (paragraph 007, ID 21a-007-20140306) that it is important the local planning authority limits the use of conditions that require their approval of further matters after the permission has been granted unless they are specifically justified. Such conditions should be discussed with the applicant before permission is granted to ensure that unreasonable burdens are not being imposed and that these conditions ensure that the timing of submission meets the planned sequence of developing the site. From October 2018, planning permission for the development of land may not be granted subject to pre - commencement conditions without agreement of the applicant.

Planning conditions that unnecessarily affect the ability to bring a development into use, allow a development to be occupied or otherwise impact on the proper implementation of the planning permission, should not be used. If the Council requires additional information in order to fully assess the proposal, we would welcome the opportunity to be able to provide this to the Council during the consideration of the application to avoid the need for pre-commencement conditions which would otherwise prohibit our client from meeting their programme.

In addition to the standard time limit and approved documents, it is anticipated that planning conditions may be necessary in respect of the following matters:

- Samples and details of external materials
- Detailed plans and elevations of parts of the development
- Construction Method Statement
- 10% Wheelchair Accessible
- Cycle Details
- Car Permit Free
- Acoustic Report
- Sound Attenuation

6.2. Community Infrastructure Levy

The Royal Borough of Greenwich Community Infrastructure Levy came into effect on 6 April 2015. The site is located within Charging Zone 1. Shared-living accommodation is charged akin to student housing and the CIL Charging Zone 1 charge is £65 per sq. metre plus indexing. In addition, the Mayoral CIL is payable at the rate of £25 per sq. metre subject to indexing.

7. Conclusions

This statement has been prepared in support of scheme proposals at The Antigallican, 148 Woolwich Road, Charlton, for a shared-living residential scheme with a retained Public House that provides high quality accommodation and community facility, in a sustainable location.

The comprehensive and detailed submission demonstrates clearly, in our view, that the submitted scheme proposals should be supported. It accords with planning legislation and guidance at local, regional and national levels; and the development proposals make effective use of a highly sustainable site, embrace high quality design principles, and have been developed by paying close attention to detail in its aesthetic composition in terms of its immediate and wider townscape.

As highlighted within the submission, there is a clear need for this type of alternative accommodation within Royal Greenwich, and it is considered that our clients experience within this market will ensure that this will be delivered to a high quality. Furthermore, the development will generate encouraging social and economic benefits to the local community, by revitalising a key local asset in the form of the Public House and creation of construction and operational jobs.

The high-quality shared-living scheme seeks to provide sustainable, interesting and well-designed accommodation within Royal Greenwich, and in accordance with Paragraph 11 of the NPPF, planning permission should be granted in this instance as there are no adverse impacts of doing so, which would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.

The application scheme presented seeks to optimise the development opportunity, and potential, presented by the subject site, whilst paying regard to all of the constraints and policy requirements that any shared-living development proposal must address.

Taking into account this assessment and all relevant planning related matters, we consider that there are sound and compelling planning reasons to support the development scheme at The Antigallican, and in the manner illustrated here, with Gallican Investments Limited 's well devised scheme proposal. We trust that this development proposal, the principle of development and investment that is being presented for the Council to consider, will be supported by Officers.

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