

Eltham and Kidbrooke Committee Area Planning Committee	Agenda Item: 6
26 November 2019	Reference No: 19/1720/F

Applicant: Mr J K Thandi

Agent: Mr Nicholas Appleby, Appleby Architects

Site Address: Ascension Vicarage, Thornhill Avenue, Plumstead, London SE18 2HS	Ward: Shooters Hill
	Application Type: Full Planning Permission

I. Recommendation

I.1 The Committee is requested to refuse Full Planning Permission for:

- Demolition of existing building and construction of part one/part three storey block and three storey block comprising of 1 x 1-bed flat, 1 x 2-bed maisonette and 3 x 5-bed houses with refuse storage, parking and landscaping.

On the basis of:

- The proposed development, by reason of its poor design and inappropriate relationship between Block B and Block A and its appreciation to the front building line of the prevailing pattern of development in Thornhill Avenue would demonstrably harm the character and appearance of the street scene and its surroundings. The proposal is therefore contrary to the Policies 3.5, 7.4 and 7.6 of the London Plan (2016), and Policies DH1, H5 and H(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
- The proposed accommodation would provide unacceptable floor-to-ceiling heights and would result in undersized bedrooms across all proposed dwellings resulting in substandard living conditions for prospective occupiers of these individual units. As such, the proposal would be contrary to Policy 3.5 of the London Plan (2016), Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), Nationally Described Housing Standards and Mayoral Housing SPG (2016).

- iii) The proposal, by reason of the inaccessible and lack of sufficient bedroom sizes in House 3, lack of level entry WC in the Maisonette and the absence of front entrance canopies would not be inclusively designed to meet the needs of the wider community and those with mobility difficulties. As such, the proposal would be contrary to Policy 3.8 of The London Plan (2016), Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), and Part M4 (2) of Schedule 1 to the Building Regulations 2015.
- iv) A Tree Survey report accompanying the application is considered out of date as it references a development with a different building footprint and therefore officers are unable to make an accurate and proper assessment on whether the proposed removal of trees and those to be retained would be acceptable. As such, the proposal cannot demonstrate compliance with Policy 7.21 of The London Plan (2016) and Policies OS(f) and H(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
- v) The proposed bin stores of House 2, the Flat and the Maisonette would exceed the maximum 15m carrying distance for waste collectors and in the absence of a waste management plan the proposal would not comply with Policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and the Council's Waste Guidance Notes May 2018.

2. **Summary**

2.1 Detailed below is a summary of the application:

The Site -	
Site Area (m ²)	970m ²
Local Plan Allocation	No
Heritage Assets	No
Tree Preservation Order	Yes
Flood Risk Zone	Flood Zone 1

Proposed Building	
Building height (metres)	Block A – 10.58m high Block B – 10.11m high
No. of storeys	Block A – Part single, part 2 storey Block B – Part single, Part 3 storeys
Floor area (m ²)	Block A – 483m ² Block B – 179m ² Total – 662m ²

Housing		
Density	Habitable Rooms per Hectare (HRH)	247 HRH
Dwelling Mix	1-bed (no. / %)	1 (20%)
	2-bed (no. / %)	1 (20%)
	5-bed (no. / %)	3 (60%)
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	No

Transportation		
Car Parking	No. Existing Off Street Car Parking Spaces	2 (tandem)
	No. Proposed Off-Street Car Parking Spaces	8
	Proposed Off-Street Parking Ratio	8 spaces per 5 units
Cycle Parking	No. Proposed Cycle Parking	No specific details have been provided.
	Complies with policy	Yes. Required cycle parking would be secured via a condition of any approval.
Public Transport	PTAL Rating	1b

Public Consultation	
Number in Support	0
Number of objections	5
Main issues raised	<ul style="list-style-type: none"> • <i>Character</i> • <i>Bulk and Scale</i> • <i>Parking</i> • <i>Density</i> • <i>Site maintenance</i> • <i>Historical Importance and demolition of existing building</i> • <i>Consultation</i> • <i>Materials</i>

- 2.2 The application is being reported to the Eltham and Kidbrooke Area Planning Committee because the application was called in by Councillor Danny Thorpe.
- 2.3 The report details all relevant national, regional and local policy implications of the scheme, including supplementary planning guidance.
- 2.4 The application is considered unacceptable and is recommended for refusal.

Site Plan



3. Site and Surroundings (in detail)

- 3.1 The application site comprises a triangular-shaped plot of land located on the eastern side of Ancaster Street on the junction with Thornhill Avenue.
- 3.2 The Ascension Vicarage is located on the land, which is a large detached two-storey building with a single-storey side extension.
- 3.3 The site is located on the southern corner of Thornhill Avenue and Ancaster Street.
- 3.4 The site was original a vicarage associated with the Parish Church of Ascension which is located in the western corner of Thornhill Avenue and Timbercroft Lane which is opposite to the application site.
- 3.5 Timbercroft Primary School is located on the northern corner of Timbercroft Lane and Irwin Avenue.
- 3.6 The application site is not in a designated conservation area, and the subject building and none of the nearby properties are statutorily or locally listed. It is also not subject to a relevant Article 4 Direction.
- 3.7 3 protected trees (1 x Lime and 2 x Cypressus) are located in the rear garden (TPO 55).
- 3.8 The application site has a public transport accessibility level (PTAL) rating of 1B, which is poor (6b being the best).

4. Relevant Planning History

- 4.1 Ascension Vicarage, Thornhill Avenue, Plumstead, SE18 2HS
 - 4.1.1 **17/1916/O** Outline planning permission (Appearance, Landscaping and Scale Reserved) for the demolition of existing building and construction of 2 x 4-bed dwellings and 2 x 2-bed and 1 x 3-bed flats with associated parking, cycle storage and refuse. **Approved** on 13/03/2019.

*NB It should be noted that the Outline Permission requires subsequent approval of Reserved Matters of the development including Design and Appearance, Scale, and Landscaping. Furthermore, the Outline Permission is also subject to the approval of the recommended conditions set out within the decision notice.

4.1.2 **I4/0393/O** Outline planning permission (Access and Layout) for 'the demolition of the existing vicarage and the erection of 3 x 4 bedroom terraced units, 1 x 2 bed and 1 x 3 bed flats with parking and associated works' **Refused** on 17/04/2014 on the following grounds:

1. *The proposed development, due to the internal layout of the 3 terraced houses, would fail to provide a high quality development as the overall living accommodation would be of an insufficient size in terms of floor area and the rooms within the loft space would not have an acceptable outlook or receive an adequate level of natural light.*
2. *The proposed development, due to the external layout of the car parking spaces in the front garden together with the refuse storage, cycle storage and front entrances to the flats, would fail to provide a high quality development that would create a positive relationship with the surrounding area. As such, the proposal would be harmful to the visual amenities of the streetscape and would over-dominate the front garden to an unacceptable degree.*
3. *In the absence of a Tree Survey to demonstrate that no harm would be caused to the nearby Lime tree (TPO 55) there are concerns about the impact of the adjacent hard surfacing and nearby foundations on its general health due to potential root compaction.*

5. Proposals (in detail)

Background

- 5.1 The application was originally reported to the Woolwich and Thamesmead Area Planning Committee meeting on the 22th October 2019. Prior to the meeting, Officers were made aware that the application site fell within a ward (Shooters Hill) of the Eltham and Kidbrooke Area Planning Committee rather than the Woolwich and Thamesmead Area Committee. The item was subsequently withdrawn from this meeting.
- 5.2 At the time of writing this report and in agreement with the Committee Chair, a site visit for the Members of the Eltham and Kidbrooke Area Planning Committee is scheduled to take place with on the 23rd November 2019

Scope of application

5.3 The current application seeks Full Planning Permission for the following:

‘Demolition of existing building and construction of part one/part three storey block and three storey block comprising of 1 x 1-bed flat, 1 x 2-bed maisonette and 3 x 5-bed houses with refuse storage, parking and landscaping.’

5.4 The development proposals would involve the demolition of the existing Ascension Vicarage building to facilitate the construction of two separate Blocks (A and B) which would house the 5 individual residential units.

5.5 Block A would contain 1 x 5 bedroom dwellinghouse (House 1) and would front Thornhill Avenue.

5.6 Block B would have a frontage onto both Ancaster Street and Thornhill Avenue and would contain 4 dwellings consisting of:

- 2 x 5 bedroom (House 2 – ground, first and second floors and House 3 – ground, first and second floors);
- 1 x 1 bedroom (Flat 1 – ground floor) and;
- 1 x 2 bedroom (Maisonette 1 – first and second floors)

5.6 The proposed development would provide a total of 8 off-street car parking spaces located in front of Block A (6 spaces) and Block B (2 spaces).

5.7 The proposal would retain 2 TPO trees and has included an Arboricultural Report which is discussed later in the report.

6. **Consultation**

6.1 The application since being submitted in June 2019 has been subject of public consultation, comprising of a site notice and 12 individual letters, sent to individual occupiers in the vicinity of the application site. This also included consultation with statutory bodies and local amenity groups.

6.2 Council Departments

6.2.1 A summary of the consultation responses received along with the officer comments are set out in table below:

Details of Representation	Summary of Comments	Officers comments
Waste Services	<p>Objection:</p> <ul style="list-style-type: none">• 3no. 240L wheelie bins are required per dwelling• The distance between the bin storage of house 2 and maisonette 1 is approx. 20m. This falls outside of our allowable distance for operatives to pull bins, therefore it will be the residents responsibility to present these bins at the kerbside for collection on a weekly basis and to return them to their storage place as soon as is possible following collection.	<p>Noted - further discussion relating to waste is within Section 17 of this report.</p>
Transport and Highways	<p>No objection subject that the vehicular crossovers to be constructed following liaison with the Council's Highways and Transport department and carried out at the developer's expense.</p>	<p>Noted - further discussion relating to Transport and Highways is within Section 16 of this report.</p>

<p>Housing Occupational Therapists</p>	<p>Objection:</p> <ul style="list-style-type: none"> • The Maisonette will not comply with M4(2) as it does not provide facilities at entrance level. • Internal layouts and door opening widths and nibs largely comply. • All houses entrance level sanitary facilities do not provide for potential shower. • Bedrooms in House 3 do not provide minimum access around the bed. • No canopies shown at front entrances. 	<p>Noted - further discussion relating to accessibility is within Section 12 of this report.</p>
<p>Tree Officer</p>	<p>Objection:</p> <ul style="list-style-type: none"> • The tree surgeons report is still working on the old plans showing a green space close to the tree. • Current plans indicate a car parking space close to the protected tree which would have implications on the root system of the tree and the proposal offers no tree protection whilst the works are in progress. 	<p>Noted - further discussion relating to trees is within Section 15 of this report.</p>

6.3 Amenity Groups

6.3.1 The Plumstead Common Environment Group was consulted however no representation was received.

6.3.2 Although not formally consulted Positive Plumstead has made representations to the application. A summary of their response along with the officer comments are set out in table below:

Summary of Comments	Officers comments
The proposal would be out of character for the surrounding area.	Issues relating to character are assessed in Section 13 of this report.
Loss of a historic building	Issues relating to the loss of the building are assessed in Section 9 of this report.
Impact on existing trees	Issues relating to character are assessed in Section 15 of this report.

6.4 Local Residents and Businesses

6.4.1 A summary of the consultation responses received from local residents, along with the officer comments are set out in table below:

Summary of Comments	Officers comments
The proposal would be out of character for the surrounding area.	Issues relating to character are assessed in Section 13 of this report.
The proposal would result in a massive overdevelopment of the area.	Issues relating to the design and bulk and scale are assessed in Sections 10 and 13 of this report.
The existing parking spaces are limited and in high demand owing to the significant amount of double yellow lines and the stress the school and church places on the parking space. Also, the proposed 8 car parks would not cater for the developments demand.	Issues relating to parking are assessed in Section 16 of this report.
Given the size of the site, the proposed density would have an over bearing impact on the area.	Issues relating to density are assessed in Section 10 of this report.
Concerns were raised about the insufficient site security around the property in terms of boarding and notices	The existing site security building is not a material planning consideration for this application.

Concerns were raised that the building has heritage and cultural significance in association with the adjacent church and should not be demolished.	Noted, however as the building is not local listed, statutorily listed or within a conservation area, the building is not afford protection by those particular policies.
Concerns were raised that the application was not notified to all of the surrounding neighbouring properties.	The application was notified in accordance with the statutory and Council notification requirements, which included sending letters to adjoining and adjacent property owners and the display of a site notice.
Concerns were raised that the proposed materials were not appropriate and would be out of character for the surrounding area.	Issues relating to design are assessed in Section 13 of this report.

7. Planning Context

7.1 This application needs to be considered in the context of a range of national, regional and local planning policies and Supplementary Planning Guidance / Documents.

- **National Planning Policy Framework (NPPF - 2019)**
- **Technical Housing Standards - Nationally Described Space Standard** (Department for Communities and Local Government – March 2015)
- **The London Plan (March 2016)** - Full details of relevant policies refer to Appendix 3.
- **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” - 2014)** - Full details of relevant policies refer to Appendix 3.
- Full details of relevant SPD / Documents refer to Appendix 3.

8. Material Planning Considerations

8.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application:

- Principle of development;
- Density;
- Residential mix;
- Quality of living environment provided for future residents;
- Design, siting and layout
- Residential amenity;
- Trees;
- Transport and access;
- Mayoral Community Infrastructure Levy (MCIL2);
- RBG CIL; and
- Implications for Disadvantaged Groups.

9. Principle of Development

Background and demolition of existing Vicarage building

- 9.1 On the 17 April 2014 Outline Permission Ref: 14/0393/O on the site was refused under delegated powers for the 'demolition of existing vicarage; erection of 3 x 4 bedroom terraced units; 1 x 2 bed and 1 x 3 bed flats with parking and associated works'. The reasons for refusal included the absence of a tree survey and an unacceptable internal and external layout of the new development.
- 9.2 On the 12 March 2018 Outline Permission 17/1916/O was granted under delegated powers for the 'demolition of existing building and construction of 2 x 4-bed dwellings and 2 x 2-bed and 1 x 3-bed flats with associated parking, cycle storage and refuse (Matters Reserved included Appearance, Landscaping and Scale)'.
- 9.3 The abovementioned Outline Permission (17/1916/O) authorised the demolition of the existing Vicarage building as part of the redevelopment of the site for a residential scheme. This Outline Permission remains extant and capable of implementation, which the applicant is entitled to rely on as a fall-back, if the current application is refused.

9.4 Notwithstanding that demolition of the existing Vicarage building has been approved, it is important to note that no development under the Outline Permission (including demolition) can commence on the site, until the Reserved Matters have been submitted to and approved by the Local Planning Authority as required by Condition 2 of the Outline Permission. It should also be noted that Permitted Development Rights to demolish (under Part 11 in Schedule 2 of the GPDO) are also not available in this case, because of Article 3(4) of the GPDO which provides that the pre-commencement conditions attached to a planning permission will have primacy over Permitted Development Rights. In short, at present the existing Vicarage building cannot be demolished until the Reserved Matters have been approved by the local planning authority.

Current application and the proposed demolition of the Vicarage building

9.5 The Vicarage building is not locally listed, statutorily listed or within a conservation area and therefore is not afforded protection by those particular statutory provisions or policies. In other words, at present the Vicarage building is neither a designated heritage asset, nor a non-designated heritage asset.

9.6 The Vicarage building has limited architectural interest. The limited points of interest include the rear elevation which, although not readily visible from the street scene, provides greater articulation than the front elevation along Thornhill Road as it has large consistently proportioned window openings on the ground and first floors and includes entrance archways. The side elevation also provides a bay projection facing Ancaster Street which faces toward the church to east and which is not a common feature within the surrounding built environment.

9.7 Although the building has some architectural interest, it is not possible for the building to be placed on RBG Local Heritage List as it would be contrary to Item 3.1 (c) of the local listing procedure which states:

a. if there is a current planning permission to either significantly alter or demolish the building, thus removing potentially important characteristics, then a full assessment to consider the building for local listing will not be carried out.

9.8 As such, owing to the current Outline Permission (Ref: 17/1916/O), which remains extant and authorises the demolition of the Vicarage building, the building itself cannot be considered for local listing at this time.

- 9.9 Notwithstanding the limited architectural contribution of the Vicarage building, the demolition of this building to facilitate the redevelopment of the site would be acceptable owing to the fact the building is not protected by any specific heritage designations and the associated policies. As such, officers consider the proposed demolition of the Vicarage building to be acceptable in principle, subject to a redevelopment scheme of a suitable scale and design.

Creation of new residential units

- 9.10 The Royal Borough of Greenwich makes a major contribution to London's Housing provision, having the third largest target for new housing of all London Boroughs. It is vital that the Royal Borough's unique housing needs are met, while still contributing to the overall London housing numbers. The borough's current target for the plan period is for a minimum of 26,850 net additional dwellings over the 10-year period 2015 - 2025 (an average of 2,685 per year, as set out in the London Plan 2016). The current application would positively contribute to this if found acceptable and permission approved.
- 9.11 Policy 3.3 of the London Plan (2016) highlights the pressing need for more homes in London and states that Boroughs should seek to achieve and exceed relevant minimum borough annual average housing targets. This is supported by Policy 3.4 which adds that development should optimise housing output for different types of location.
- 9.12 Policy H1 of the Local Plan states that current target for the plan period is for a minimum of 26,850 net additional dwellings over the 10-year period 2015 - 2025 (an average of 2,685 per year, as set out in the London Plan 2016).
- 9.13 Although the application results in the loss of a single 4+bed vicarage dwelling, the proposal will result in the creation of five new dwellings including 3x5-bed flat, 1x2bed and 1x1bed dwellings. As such, there would be no net loss of dwellings but rather a net increase of 4 residential units resulting in new housing in particular much-wanted family dwellings for the borough which would contribute to the Council's housing targets and London in general in accordance with Core Strategy Policy H1 and London Plan Policy 3.3.

Backland development

- 9.14 Policy 3.5 of the London Plan allows Boroughs to introduce a presumption against development on back gardens into their Local Development Frameworks. The Royal Greenwich Local Plan: Core Strategy with Detailed Policies does not include such a policy but does have Policy H(c) which sets criteria for such development. The specific criterion associated with this policy is discussed further below.
- 9.15 Core Strategy Policy H(c) states Residential development on backland and infill sites will only be favourably considered where all the following criteria are fulfilled:
- (i) *There is no unreasonable reduction in the amount of amenity space enjoyed by existing residents, especially for those in houses with the shared use of a garden;*
 - (ii) *There is no unreasonable loss of privacy from overlooking adjacent houses and/or their back gardens(also see Policy DH(b));*
 - (iii) *There is no unreasonable increase in noise and disturbance from traffic gaining access;*
 - (iv) *There is no significant loss of wildlife habitats, particularly trees or shrubs which would adversely affect the appearance and character of the area; and*
 - (v) *The character of the area is maintained with particular regard to the scale, design and density of the development.*
- 9.16 The site is located on the corner of Ancaster Street and Thornhill Avenue. A number of properties along each of these streets have seen some small scale rear extensions. A feature of the development pattern along these streets is the uniform front and rear building lines, the semi-detached nature of the dwellings and the long large rear gardens.
- 9.17 Given that proposed Block A and Block B have been sited along the frontage of the site and retained suitable rear gardens for the family sized dwellings, it is considered that the proposal would not disrupt the existing development pattern.
- 9.18 It is noted that the Outline Approval on the site approved a similar building footprint to what is proposed and also gave approval for 5 units, the same number of units which is proposed in this current application.
- 9.19 As such, considering the previous Outline Approval for 5 units which had a similar footprint, the principle of the infill is acceptable, subject to further detailed consideration of (ii), (iv) and (v) of Policy H(c) in the rest of this report.

10. Density

- 10.1 The proposal would demolish an existing single dwelling and redevelop the site to facilitate the creation of 5 residential units. Therefore, density is considered to form significant material planning consideration for the assessment of the application.
- 10.2 Planning Policy 3.4 of The London Plan seeks to optimise the development capacity of a site and states that Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Table 3.2 of the London Plan sets out recommended density thresholds for sites depending two main criteria, the first being their location and their accessibility to public transport (PTAL rating) and the second being the setting of the development (central, urban, or suburban). The London Plan defines the three setting types and TFL provide the PTAL level.
- 10.3 The application site is characterised as an urban area with poor access to public transport as it has a PTAL rating of 1B.
- 10.4 The surrounding development pattern must be considered in line with the definitions provided in Table 3.2 of The London Plan, and the Outline Approval (17/1916/O) for 5 residential units considered that the site would fall within an 'urban' setting.
- 10.5 In light of this, the recommended London Plan density level for the site is between 150-250 habitable rooms per hectare (in an urban setting). The proposed development would have the same total number of units (5) and a higher number of habitable rooms (24), on a 940sqm site. This results in a density level of 247 habitable rooms per hectare and 53 units per hectare. Despite the increase, the proposed amount of habitable rooms per hectare is within the recommended range and is acceptable in this instance and would comply with Policy 3.4 of The London Plan.

11. Residential Mix

- 11.1 Housing mix policy H2 of the Core Strategy states that 'a mix of housing types and sizes will be required in all developments including conversions and should contain a proportion of 3, 4 and 4+ bedroom units. The exact mix on each site will vary according to the location of the development and the character of the surrounding area and will be affected by factors such as; the need to protect small and medium sized family dwellings from sub-division and

conversion, the level of accessibility to public transport, schemes for special needs groups, or where there is a poor external environment’.

11.2 The current application seeks to provide the following mix:

Table 11.1 – Proposed Housing Mix

Unit type / size	Total (%)
1-bed	1 (10%)
2-bed	1 (20%)
5-bed	3 (60%)
Total	5 (100%)

11.3 The proposed housing mix would be in favour of family-sized units and is appropriate and in line with Core Strategy Policy H2.

12. Quality of Living Environment provided for future residents

12.1 The current application seeks permission for 5 residential units, consisting of 1 x one-bed unit, 1 x two-bed units and 3 x five-bed units.

12.2 In assessing the proposal against The London Plan and Nationally Described Space Standards, the rooms with double beds have been assumed to cater for two persons, and the rooms with a single bed have been assumed to cater for 1 person.

12.3 The following table shows how this size of unit compares with the requirements of the Technical Housing Standards – Nationally Described Space Standard’s (2015) standards:

**Table 11.2 - Nationally Described Space Standard's
Gross internal Area Requirements**

Flat Type	Nationally Described Space Standard's (gross internal area)	Proposed units (m²)	Compliant?
Block B, House 1, Three Storey, Five bedroom, Nine persons	134m ² (*based on 8 persons)	179m ²	Yes
Block A, House 2, Three Storey, Five bedroom, Ten persons	134m ² (*based on 8 persons)	155m ²	Yes
Block A, House 3, Three Storey, Five bedroom, Nine persons	134m ² (*based on 8 persons)	153m ²	Yes
Block A, Flat 1, One Storey, One bedroom, two persons	50m ²	67m ²	Yes
Block A, Maisonette 1, Two Storey, Two bedroom, four persons	79m ²	108m ²	Yes

*It is noted that the nationally described space standard does not offer unit sizes with dwellinghouses that cater for more than 8 persons.

- 12.4 In calculating the gross internal floor area any area with headroom of less than 1.5m is not counted within the Gross Internal Area (GIA) unless used solely for storage. As the development proposes bedrooms in the roof space of each building, the area with a head room of less than 1.5m should not be counted in the GIA for these bedrooms.
- 12.5 In relation to the above proposed total GIA, it is determined that the proposed dwellings would all provide acceptable sized dwellings and would generally meet the requirements of the Nationally Described Space Standards.
- 12.6 In terms of the GIA of each bedroom, there are bedrooms within all dwellings which fall significantly below the minimum sizes as required by nationally described space standards as can be seen in the table below. As such, the proposal would fail to provide a suitable living environment for future occupiers of the dwellings.

Table 12.3 - Nationally Described Space Standard's bedroom size requirements

Flat Type	Bedroom	Nationally Described Space Standard's (bedroom size)	Proposed units (m ²)	Compliant?
Block B, House 1	Bedroom (first floor double with en-suite)	11.5m ²	12.9m ²	Yes
	Bedroom 2 (first floor double)	11.5m ²	9.7m ²	No
	Bedroom 3 (first floor double)	11.5m ²	8.2m ²	No
	Bedroom 4 (second floor single)	7.5m ²	5.7m ²	No
	Bedroom 5 (second floor double)	11.5m ²	20.7m ²	Yes

Block A, House 2	Bedroom 1 (first floor double)	11.5m ²	10.3m ²	No
	Bedroom 2 (first floor double)	11.5m ²	10m ²	No
	Bedroom 3 (first floor double)	11.5m ²	9.75m ²	No
	Bedroom 4 (second floor double)	11.5m ²	11m ²	No
	Bedroom 5 (second floor double)	11.5m ²	9.1m ²	No
Block B, House 3,	Bedroom 1 (first floor double)	11.5m ²	8.6m ²	No
	Bedroom 2 (first floor double)	11.5m ²	9.73m ²	No
	Bedroom 3 (first floor double)	11.5m ²	8.22m ²	No
	Bedroom 4 (second floor single)	7.5m ²	5.7m ²	No
	Bedroom 5 (second floor double)	11.5m ²	15.46 m ²	Yes
Block B, Flat 1	Bedroom (ground floor double)	11.5m ²	13.2	Yes

Block B, Maisonette	Bedroom (second floor double with en- suite)	11.5m ²	12.5m ²	Yes
	Bedroom (first floor double)	11.5m ²	10.34	No

- 12.7 A ceiling height of 2.3m for at least 75% of the GIA is required by the Nationally Described Space Standards however Standard 31 of the Housing SPG of the London Plan 2016 strongly encourages ceiling heights to be 2.5m for at least 75% of the gross internal floor area to improve the amount and quality of natural light and ventilation and provide flexibility in the use of a room. As such, a 2.5m floor to ceiling height should be achieved for the proposed development. The submitted sections indicate that while the ground floors of the buildings would provide a floor to ceiling height of 2.48m, the first floor would only have a floor to ceiling height of 2.33m and the roof space would have areas that are less than 2.3m. As such, development would not provide a suitable floor to ceiling height for future occupiers, and would be contrary to Standard 31 of the Housing SPG of The London Plan.
- 12.8 The required storage space for each dwelling has not been provided for each dwelling. However it is considered that there is sufficient room to provide this and could be conditioned if the application was recommended for any approval.
- 12.9 The London Plan Housing SPG states '*a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.*'
- 12.10 The proposed flats and the dwellings would provide private outdoor space in excess of the requirements.

Table 11.4 - London Plan Housing SPG Private Open Space Requirements

Flat Type	London Plan Housing SPG Private Open Space Requirements	Proposed (m²)	Compliant?
Block B, House 1	12m ²	124m ²	Yes
Block A, House 2	13m ²	62m ²	Yes
Block B, House 3,	12m ²	86.9m ²	Yes
Block B, Flat 1	5m ²	43.9m ²	Yes
Block B, Maisonette	7m ²	11.5m ²	Yes

12.11 Standard 28 of the Housing SPG of The London Plan requires habitable rooms to be provided with an adequate level of privacy.

12.12 The development is positioned so that no windows are directly facing neighbouring properties and both Blocks A and B are located at the front of the site in-line with neighbouring residential buildings. The rear gardens may be subject to minimal overlooking however this is consistent with the surrounding area owing to the two storey nature of the existing buildings. As such, it is considered that future occupiers would be afforded a suitable level of privacy.

12.13 Policy 3.5 of The London Plan, Policy H5 of the Core Strategy, and standard 32 of the housing SPG states that single-aspect dwellings especially north-facing should be avoided as they are unlikely to provide future occupiers with an acceptable amount of daylight/sunlight which is essential to providing a high-quality living environment.

12.14 The habitable spaces in the proposed flats would receive an adequate amount of natural light via windows and doors. No single aspect dwellings are provided. The proposal is considered to be acceptable in this regard.

12.15 Policy 7.2 of the London Plan and DHI of the Local Plan requires new development to achieve the highest standards of accessibility and inclusive design.

- 12.16 All new housing should meet Building Regulations requirement M4(2) ‘accessible and adaptable dwellings.’ The Council’s Housing and Occupational Therapist Team have reviewed the design and layout of the proposal and found it does not comply with numerous aspects of M4(2). The identified non-compliances predominantly relate to no facilities at entrance level for the maisonette, in all dwellings the entrance level sanitary facilities do not provide for shower, bedrooms in House 3 do not provided minimum access around the beds, and no canopies are shown over front entrances.
- 12.17 Although M4(2) can generally be conditioned to ensure compliance, considering the small room sizes in House 3 the minimum access around the beds would not be able to be achieved and given the other shortfalls this cannot be dealt with via a condition.
- 12.18 Although the proposed residential units would provide sufficiently sized units and privacy for the occupants, the individual bedrooms and the floor to ceiling heights would both not be of an appropriately size. Additionally, the units would not provide an accessible and adaptable living environment that would be inclusive for all people. As such, the proposal would be contrary to Policies 3.5 and 7.2 of the London Plan (2016), Policies DH1 and H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), Nationally Described Housing Standards and Mayoral Housing SPG (2016).

13. Design, Siting and Layout

- 13.1 Policy DH1 of the Local Plan requires new development to be of a high quality, which should positively contribute to the improvement of both the built and natural environment. As such, developments should seek to complement the architecture of surrounding buildings, the established layout and character of the area and the appearance of the street scene through design solutions which respect the scale, height, bulk and massing of the existing built form in the area, whilst seeking to use appropriate materials and external finishes.
- 13.2 The surrounding area is comprised of predominantly semi-detached dwellings with large rear gardens and hipped roofs. While it is noted that the site contains a large detached building (the Vicarage), it also contains a significantly large rear garden to offset the size of the building. The Outline Approval proposed a continuous building footprint that wrapped around the corner of Thornhill Avenue and Ancaster Streets. The proposed development would demolish the existing building and construct two buildings, Block A and Block B.

- 13.3 Block A would predominantly face Ancaster Street while the north facing gable end would also front Thornhill Road. This building would be part two storey and part 3 storey, be 10.6m high, have a total elevation length of 24.3m along Ancaster Street and the building would have various rear depths into the site. The general scale and bulk of Block A would respect the street scene along the Ancaster Street and at the corner of Ancaster Street and Thornhill Avenue.
- 13.4 In relation to Block B and its position relative to No. 2 Thornhill Avenue, the building would be setback 3m from the front building line and the two storey part would be 2.5m deeper than the rear building line. Additionally, it would be offset 0.9m from the shared side boundary and would have a total height of 6.5m near the side boundary. Owing to the two storey nature of the building, the depth and the limited setback from the side boundary, it is considered that this building would have a scale that would not dominant No. 2 Thornhill Avenue.
- 13.5 Further, the established development pattern includes significant long rear gardens for each dwelling. The proposal would provide rear gardens for the three 5 bed dwellings that are large and designed to be similar to the adjoining gardens. As such, the proposal would retain the existing development pattern of large long rear gardens for family sized dwellinghouses.
- 13.6 However, the current proposal includes two buildings which provide an unacceptable relationship between them, and a disjointed appearance for the development as a whole. This has resulted in Block B being sited behind the adjoining terrace line on Thornhill Avenue with an awkward and close juxtaposition to Block A. As such, this emphasises the poor design and spatial layout of the proposal, and it is noted that the layout proposed is materially different to what was considered acceptable in the Outline Approval.
- 13.7 It is considered that the proposal would not respect the existing street scenes and would result in an incongruous development for the area. As such, the overall design of the proposed development is considered to be unacceptable.

14. Residential Amenity

- 14.1 Policy DH(b) of the Local Plan states that new developments will only be permitted where it can be demonstrated that the proposal 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 un-neighbourly sense of enclosure. This is supported by Policy 7.6 of The London Plan.

- 14.2 Block A is setback 6m from Ancaster Street, approximately 1.8m from corner of Ancaster Street and Thornhill Avenue, and 4.5m from No. 1 Ancaster Street. The building would be separated from the adjoining dwelling to the south (No. 1 Ancaster Street) by 4.5m. No windows above ground level would directly face No. 1 Ancaster Street. Proposed windows along the rear eastern elevation would not directly overlook the properties to the south or east above the existing level of the area.
- 14.3 No. 1 Ancaster Street has a two ground floor and a first floor side window which would facing the flank wall of Block A however it is considered the separation distance between the two buildings would be sufficient to not create a sense of enclosure or loss of daylight/sunlight.
- 14.4 Block A has been designed so that it would not impact upon the residential amenity of surrounding properties to a level which would warrant a refusal.
- 14.5 Block B would include a 5-bedroom residential dwelling and would front Thornhill Avenue. The building would provide a setback of 6.5m from the highway, 0.9m to the adjoining dwelling at No. 2 Thornhill Avenue, and greater than 20m to the dwelling on the adjacent side of Thornhill Avenue. No windows are proposed above ground floor on either flank. The east elevation of the building would front No. 2 Thornhill Avenue and the western elevation would front the rear of proposed Block A.
- 14.6 The rear facing windows on the second floor of Block B would not directly overlook No. 2 Thornhill Avenue or any other surrounding properties above existing levels experience in the surrounding area.
- 14.7 No. 2 Thornhill Avenue has a ground and first floor side windows facing the blank wall of Block B and has ground and first floor rear facing windows. It is considered the separation distance between the two buildings would be sufficient to not create a sense of enclosure or loss of daylight/sunlight to these windows.
- 14.8 Block B has been designed so that it would not impact upon the residential amenity of surrounding properties to a level which would warrant a refusal.
- 14.9 As such, it is considered that the proposed development would not significantly impact the residential amenity of neighbouring properties and therefore would comply with Policy 7.6 of The London Plan and Policy DH(b) of the Local Plan.

15. Trees

- 15.1 Policy OS(f) of the Core Strategy requires an appropriate level of survey to enable decision to be made about the existing trees on the site. Development decisions are required to consider the protection of trees and their root systems both during and after building operations, and achievement of appropriate replacement of trees taking account of size, coverage, and species where it is agreed that trees can be felled.
- 15.2 A Tree Survey with an Arboricultural Implications Assessment was included in the application. However, this report dated June 2017 is the same report submitted with the original Outline Approval and therefore the conclusions are based upon a tree protection plan for a development that has a different building footprint and how it relates to the TPO trees is different.
- 15.3 The report submitted is considered out of date and not suitable to support the removal of trees subject to a TPO. Therefore, officers are unable to properly assess the impact on the existing trees and the proposal cannot demonstrate compliance with Policy OS(f) Ecological Factors of the Core Strategy.

16. Transport and Access

- 16.1 The site is situated in an area of poor access to public transport having a PTAL of 1B on a scale of 1 to 6 where 6 is considered excellent.
- 16.2 The site currently contained two formal car parking spaces. The development proposes a total of 8, with 2 parking spaces to be allocated to each of the 5-bedroom dwellings and 1 car parking space to the flat and 1 car parking space to the maisonette. This level of car parking is considered acceptable considering the poor PTAL rating of the site.
- 16.3 The transport and highways officer provided no objection to the proposal on the basis that the required works for the construction of the new driveways were conducted at the developer's expense.
- 16.4 No cycle parking has been identified on the submitted drawings, however officers do acknowledge that there would be sufficient room in the gardens area to accommodate required levels of cycle parking (2 spaces per dwelling). As such, a condition could have secured sufficient cycle parking should the application had been recommended for any approval.

17. Waste and Recycling Standards

- 17.1 London Plan Policy 5.16 requires London Boroughs to minimise waste and encourage recycling.
- 17.2 Core Strategy Policy Ha states that new residential developments should include adequate provision for waste recycling and Policy DHI states that all developments should demonstrate on-site waste management including evidence of waste reduction, use of recycled materials and dedicated recyclable waste storage space.
- 17.3 Further, Council's Waste Guidance Notes May 2018 requires the walking distance for refuse operatives from the container storage area to the refuse collection to be no more than 15metres.
- 17.4 The distance between the bin storage of House 2, the Flat and the Maisonette is approximately 20m. As this is outside the allowable distance Council's Fleet and Waste Strategy Department have confirmed that it would be the responsibility of the residents to present these bins to the kerbside. In addition no waste management plan has been submitted.
- 17.5 Nevertheless, as this development would be a new build and is not restricted it is expected that bin storage locations should be located in accordance with provided guidance.
- 17.6 Therefore, as there are bins stores outside of the allowable distance for operatives to pull bins, it is considered that the proposal is contrary to the above policy framework and is unacceptable

18. Mayoral Community Infrastructure Levy (CIL2)

- 18.1 The Mayor has introduced a London-wide Community Infrastructure Levy (MCIL2) to help implement the London Plan, particularly Policies 6.5 and 8.3. The Mayoral CIL2 formally came into effect on 1st April 2019, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL2 will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £25 per square metre.
- 18.2 The current application is liable to this requirement.

19. RBG CIL

19.1 The Royal Borough adopted its Local Community Infrastructure Levy (CIL) charging schedule, infrastructure (Regulation 123) list, instalments policy and exceptional circumstances relief policy on the 25th March 2015 and came into effect in Royal Greenwich on the 6th April 2015.

19.2 The current application is liable to this requirement.

20. Implications for Disadvantaged Groups

20.1 There are no specific implications identified for the application.

21. Conclusion

21.1 The proposed scheme would result in a redevelopment of the Ascension Vicarage site in Plumstead.

21.2 The proposed demolition of the Vicarage building, as it relates to part of this current application only, would be acceptable in principle as the existing building offers limited architectural interest to the streetscene and there are no policy or heritage designation protections that would require its retention.

21.3 In relation to the redevelopment component of the proposal, it is considered that the design and layout of the proposals would harm the character and appearance of the street scene and its surroundings, and would provide substandard and cramped living conditions for future occupiers. Further, the proposed development has not been designed inclusively designed to meet the needs of the wider community and those with mobility difficulties and has not been designed to comply with waste collection requirements. Additionally, in the absence of an updated Arboricultural report the development has not demonstrated that it would protect the TPO trees on the site.

21.4 On balance, although the demolition of the Vicarage building is acceptable the new development it replaces is unacceptable both in terms of its design and layout. The development therefore would be contrary to pertinent policies in The London and the Local Plan, and in its current form is considered to represent an unacceptable form of redevelopment on the site.

21.5 Accordingly, it is recommended that permission be refused for application reference 19/1720/F, in line with Section I of this report.

Background Papers: National Planning Policy Framework (NPPF – 2019)
The London Plan (2016)
Royal Greenwich Local Plan: Core Strategy with
Detailed Policies (2014)
Mayoral Housing SPG (2016)
Nationally Described Space Standards (March 2015)
Council's Waste Guidance Notes May 2018

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