

Eltham & Kidbrooke Area Planning Committee	Agenda Item: 6
29 September 2020	Reference No: 20/0326/F

Applicant: Mr Colin Brown, 11 Kings Road, Romford, Essex, RMI 2ST

Agent: N/A

Site Address: 57a Kingsground, Eltham, London, SE9 5EY Eltham, London, SE9 5EY	Ward: Eltham South Application Type: Full Planning Permission
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I. Recommendation

I.1 The Committee is requested to grant Planning Permission as outlined below:

- Construction of a single storey rear extension and sub-division of plot to facilitate the construction of a two-storey dwellinghouse (1 x 2-bed).

Subject to:

- (i) Conditions set out in Appendix 2.

2. Summary

2.1 Detailed below is a summary of the application:

The Site -	
Site Area (m ²)	330m ²
Heritage Assets	Adjacent to Eltham Palace Conservation Area
Tree Preservation Order	No
Flood Risk Zone	No

Proposed Building	
Building height (metres)	9.6m
No. of storeys	2
Floor area (m ²)	94sqm

Housing	
Dwelling type	2-bed, 2 storey
Housing Standards	The proposal complies with Technical housing standards – nationally described space standard and London Plan standards.

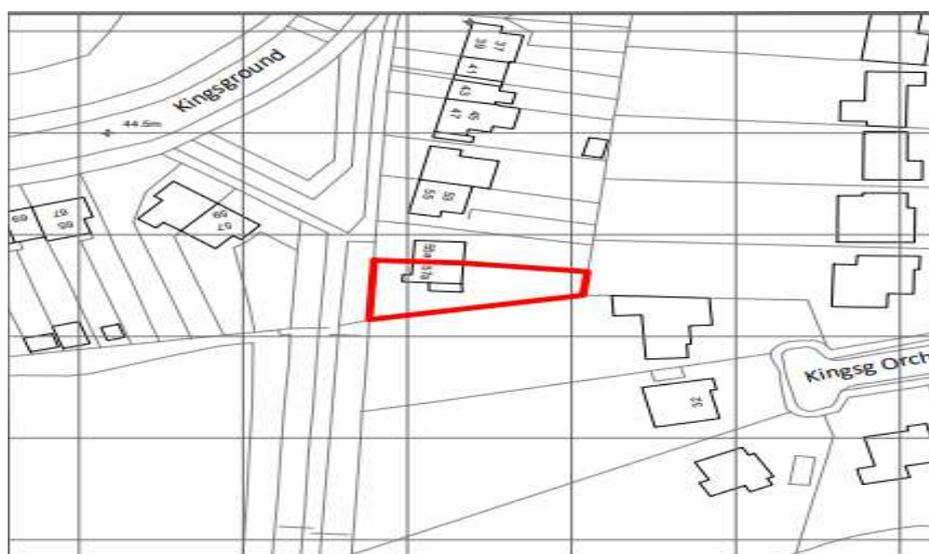
Transportation		
Car Parking	No. Existing Off-Street Car Parking Spaces	0
	No. Proposed off-Street Car Parking Spaces	2
Cycle Parking	No. Proposed Cycle Parking	2
	Complies with policy	Yes
Public Transport	PTAL Rating	2

Public Consultation	
Number in Support	0
Number of objections	9
Main issues raised	<ul style="list-style-type: none"> • Contrary to policy • Scale and massing unacceptable • Create undesirable precedent • Loss of residential amenity of neighbouring properties. • Loss of privacy • Loss of residential garden. • Development would fail to complement the unique character of the area. • Proposal would not respect the pattern of development. • The proposal would be an incongruous form of development. • Unneighbourly sense of enclosure. • Inadequate parking facility. • Proposed density is too high. • Proposed development is too cramped. • Would harm the Eltham Palace Conservation Area. • Previous applications refused in local area.

- 2.2 The application is being reported to the Eltham and Kidbrooke Area Planning Committee because more than 8 objections to the proposed development have been received.
- 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 to be acceptable and is recommended for approval, subject to compliance with the below conditions detailed in Appendix 2.

3. Site and Surroundings

- 3.1. The subject site contains a two-storey, semi-detached single-family dwelling. The subject property and the adjoining dwelling (no.55a) features a mock Tudor Gable front. The application site has a rectangular shape which tapers towards the end of its rear garden. The property is set back from Kingsground behind a small grassed area, hard standing and public footpath and features a brick boundary treatment. The public footpath in front of the subject property runs north to south connecting Kingsground and King John's Walk respectively. To the East of the application site is 28 Kings Orchard, whilst to the South is 30 Kings Orchard. The surrounding area is characterised by a mix of detached, semi-detached and terraced single family terraced dwellings.
- 3.2. The site is adjacent to metropolitan open land to the South West. The property is not statutorily or locally listed but it is located directly adjacent to the Eltham Palace Conservation Area to the South and East. The site is not affected by any relevant Article 4 Direction.



4. Relevant Planning History

- 92/0835/H – Erection of a two-storey side extension together with a new front porch – approved 23/09/1992 – (not implemented)
- 18/4159/HD - Demolition of front porch and ground floor side extension and undertake construction of 2-storey side extension, including new windows, a roof extension and creation of new front porch – 22/01/2019

5. Proposal

5.1 The proposed development is outlined as follows.

“Construction of a single storey rear extension and sub-division of plot to facilitate the construction of a two-storey dwellinghouse (1 x 2-bed).”

- 5.2 The proposed development would involve the construction of a two-storey 2 bed, 4-person single family dwelling house with 1 parking space at the front and private outdoor space to the rear. The proposal would adjoin the southern flank wall of no.57a Kingsground creating a terrace group of 3 units. The proposal would feature a 3m deep single-storey rearward projection adjacent to its shared boundary.
- 5.3 With regards to no.57a the property would be extended by way of a 3m deep single storey rear extension and the alteration to the roof form to create a single ridgeline linking to the proposed dwelling as opposed to a hipped roof. The hard boundary treatment would be removed to create a parking space.
- 5.4 The front elevation of the proposed end-of-terrace dwelling would feature a mock Tudor gable front. The roof profile of the new unit would be hipped which is also a characteristic feature of the terrace.
- 5.5 The refuse storage bins would be located to the side of the subject property and there would be 2 bicycle parking spaces to the front.
- 5.6 In respect to materiality, the application form indicates that the materials used to construct the proposal would match the existing.

6. Consultation

- 6.1 The application since being submitted has been the subject of public consultation, comprising a site notice placed on site on the 26th February 2020 and a press notice issued on the 15/07/2020. Twelve (12) individual letters were sent to the occupiers of neighbouring properties in the vicinity of the application site. The process also included consultation with internal consultees and the Eltham Society.

Council Departments

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

Details of Representation and date received	Summary of Comments	Officer's comments
Highways Officer – 21/08/2019	No highways objection.	Noted
Waste Strategy Officer	Proposal is satisfactory with regards to waste storage and collection.	Noted
Housing Occupational Therapy Manager	The proposal must comply build M4(2)	Noted. A condition has been attached requiring the proposed development to meet M4(2) building control accessibility standards.
Environmental protection	No objections	Noted

Neighbour Responses

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

Summary of Comments	Officer's comments
Contrary to policy	For the reasons set out in the report the proposed development complies with adopted planning policy.
Scale and massing unacceptable	For the reasons set out in section 10 of the report the scale and massing of the proposal is acceptable.
Create an undesirable precedent	The proposed development is acceptable and would not create an undesirable precedent.
Loss of residential amenity of neighbouring properties	For the reasons set out in section 12 of the report the development would not have an adverse impact on the residential amenity of neighbouring properties.
Loss of privacy	For the reasons set out in section 12 of the report the development would not result in a loss of privacy for neighbouring properties.
Loss of residential garden	The proposed development would result in the loss of the land to the side of the application site. This is currently hard surfaced. Both the proposed and existing dwelling would be provided with an acceptable sized garden as a result of the development.
Development would fail to complement the unique character of the area	For the reasons set out in section 10 of the report the development would complement the character of the area.
Proposal would not respect the pattern of development	For the reasons set out in section 10 of the report the development would respect the pattern of development in the area.

The proposal would be an incongruous form of development	For the reasons set out in section 10 of the report the development would not constitute an incongruous form of development.
Unneighbourly sense of enclosure	For the reasons set out in section 12 of the report the development would not result in an unneighbourly sense of enclosure.
Inadequate parking facility	For the reasons set out in section 13 of this report the proposed development would provide sufficient off-street parking facilities
Proposed density is too high	The proposed density of the new house would be 214HRH, which is acceptable for this location.
Proposed development is too cramped	For the reasons set out in section 11 of the report the development would not create a cramped form of development.
Would harm the Eltham Palace Conservation Area	For the reasons set out in section 10 of the report the development would not harm the character and appearance of the Eltham Palace Conservation Area.
Previous applications refused in the local area	All planning applications are assessed on current planning policy and on their own merits.

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.

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 (Ref: 20/0326/F):

- Principle of development;
- Design and impact on the Eltham Palace Conservation Area;
- Standard of accommodation for future occupiers;
- Residential Amenity;
- Transport and Highways;
- Waste and recycling;
- Community Infrastructure Levy (CIL); and

9. Principle of Development

9.1 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.

9.2 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.

9.3 Policy HI of the Core Strategy states that the 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).

- 9.4 The proposed development would make a minor contribution of 1 new dwelling towards the Council's housing target and London in general.
- 9.5 Paragraph 68 of the National Planning Policy Framework 2019 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should; (d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.
- 9.6 The proposed dwelling would be located to the side of 57a Kingsground. London plan policy 3.5 states that boroughs may introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified. Core Strategy policy H(c) states that due to the pressure for land for new housing in Royal Greenwich, infill and backland sites are increasingly considered for housing development subject to the following criteria: (see next page →)

Criteria	Assessment
i. An unreasonable reduction in the amount of amenity space enjoyed by existing residents, especially for those in houses with the shared use of a garden;	The proposal would not result in an unreasonable reduction in the amount of amenity space enjoyed by existing residents at No. 57a Kingsground Road in meeting criteria i. This is expanded on in Section 11 of this report.
ii. An unreasonable loss of privacy from overlooking adjacent houses and/or their back gardens (also see Policy DH(b));	The proposal would not result in the unreasonable loss of privacy from overlooking adjacent houses or their back gardens complying with criteria ii and this discussed further in detail in Section 12 of this report.
iii. An unreasonable increase in noise and disturbance from traffic gaining access;	In terms of criteria iii Section 13 of this report demonstrates the proposed development would not create an unreasonable increase in noise and disturbance from traffic gaining access.
iv. There is significant loss of wildlife habitats, particularly trees or shrubs which would adversely affect the appearance and character of the area; and	The application is not supported by an ecology appraisal, however the site does not have any policy designation that requires such details to be submitted having regard to criteria iv.
v. The character of the area is not maintained with particular regard to the scale, design and density of the development.	The proposal is considered to be acceptable in respect to character, scale, design and density against criteria v and this is expanded on in Section 10 of this report.

9.7 In light of the above and for reasons further expanded on throughout the body of this report it is considered that the proposed development would comply with policy H(c) and the principle of the infill development on the site is therefore acceptable.

10. Design and impact on the Eltham Green Conservation Area

- 10.1 As part of the assessment of the acceptability of the principle of the development, Officers have regard to point (v) of Core Strategy policy H(c), which states that the character of the area is maintained with particular regard to the scale, design and density of the development. Policy DH1 states that all developments are expected to provide a positive relationship between the proposed and existing urban context by taking account of the established layout and spatial character. Policy H5 requires new residential development to achieve a high quality of housing design. The above policies are supported by London Plan policies 3.5 and 7.4.
- 10.2 As the application site is located adjacent to the Eltham Palace Conservation Area, the impact of the development on this identified heritage asset needs to be assessed. Under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, when assessing a proposal related to land and buildings adjacent to a conservation area special attention should be paid to the desirability of preserving or enhancing the character or appearance of that designated heritage asset.
- 10.3 Chapter 16 of the National Planning Policy Framework (NPPF) identifies the significance of heritage assets and places an importance on their conservation. Paragraph 193 of the NPPF states that when assessing planning applications affecting heritage assets, great weight should be placed on their conservation. Paragraph 194 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 10.4 This advice is carried through at a local level within London Plan policy 7.8 and Core Strategy policies DH3 and DH(h). Policy DH(h) of the Royal Greenwich Local Plan Core Strategy (2014) states that planning permission will only be granted for proposals which pay special attention to preserving or enhancing the character or appearance of the Conservation Area.
- 10.5 The insertion of an additional dwellings to the side of no.57a Kingsground would respect the height, scale and bulk of adjoining properties and would appear as an integral addition that would respect the character and appearance of the existing semi-detached pair and the wider street scene.

- 10.6 It is acknowledged that the proposal would result in the loss of the openness of the application site at its side. However, due to the sites location away from the main road and its limited visibility from the wider street scene, the harm caused by this would be minimal and would not have an adverse impact on the overall character and appearance of the area. In coming to this view officers are mindful that 55a has been extended to the side and the limited gaps that exist between the other properties in this section of Kingsground.
- 10.7 The proposed dwelling by virtue of its design creates a degree of symmetry within the newly formed terrace. In respect to materiality the proposed dwelling would feature a mock Tudor gable front with facing brick work to match the existing adjoining property. The roof of the proposal would be tiled. The proposed materials would mirror that of the existing dwellings on Kingsground and would therefore be acceptable in this regard. As such the design of the proposed dwelling is acceptable. The proposal would also feature a single storey rear extension which would have a depth of 3m and a height of 2.8m. This would not be an excessive rearward projection or unduly high.
- 10.8 With regards to the proposed single storey extension to the existing property. The proposed extension would have a depth of 3m and a height of 2.8m. This is also considered to be an acceptable and a proportionate addition to the subject property.
- 10.9 In respect of the impact of the proposed development on the Eltham Palace Conservation Area, the proposed development would be located adjacent to the far north western corner of the Conservation Area, next to 28 and 30 Kings Orchard. Given the limited scale of the development and its relationship with the Conservation Area, the proposal would not be highly visible and would have no adverse impact on views into or out of the Conservation Area. Moreover, as the design of the proposed dwelling is characteristic of the surrounding properties in Kingsground it would respect the established pattern of development within the area.

10.10 For the reasons outlined above it is considered that the development would not cause any substantial harm to the appearance or character of the conservation area or that of the immediate area. Furthermore, any harm that is generated would be off-set by the public benefit of the creation of an additional dwelling. The proposal would therefore comply with the requirements of the NPPF, London Plan Policies 3.5, 7.4 and 7.8, Core Strategy Policies H5, H(c), DH1, DH3 and DH(h) as well as the Eltham Place Conservation Area Character Appraisal.

11. Standard of accommodation for future occupiers

11.1 The current application seeks permission for one residential unit. 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:

Unit Type	Room	Nationally Described Space Standard’s (2-bed, 3 people unit over 2 floor)	Proposed unit (m²)
Two bedroom, four person unit		79m ²	94m ²
		2.3m for at least 75% of gross internal area	2.3m for at least 75% of gross internal area
	Bedroom 1 (double)	11.5m ²	11.5m ²
	Bedroom 2 (double)	11.5m ²	12m ²
	Storage	2.0m ²	0.65m ²

11.2 The table above demonstrates that the proposed dwelling would comply with and exceed the above standards except for the provision of designated storage space. Although limited storage facilities (a laundry room) are shown on the plans submitted, as the GIA of the proposed unit significantly exceeds the minimum requirements, future occupiers would not be prejudiced as additional storage space can readily be made available. The

submitted cross sections demonstrate that the internal floor to ceiling height would be above 2.3m for at least 75% of its area.

- 11.3 The proposed dwelling would be dual aspect with windows to the front and rear of the property. Further to this it is considered that the dwelling has been provided with enough window openings to secure natural light and cross ventilation. In this context it is considered that the proposed development would be acceptable in respect to residential amenity of future occupiers and standard of accommodation.
- 11.4 The garden area of the proposed unit and the resultant garden area for the existing unit (providing 67sqm and 60sqm for the existing and additional unit respectively) would also comply with the requirements of both the London Plan (5sqm plus 1sqm for each additional occupant) and Greenwich's Core Strategy (50sqm).
- 11.5 Policy 7.2 of the London Plan requires developments to be designed so that they provide an inclusive environment for all members of society. Core Strategy Policy H5 supports the principles of inclusive living environment and Policy DH1 also states that all new developments should achieve accessible and inclusive environments. Officers note that at a minimum, proposals should comply with the standards of Approved Document M4 category 2: accessible and adaptable dwellings of The Building Regulations. A condition has been attached requiring compliance with M4(2) requirements.
- 11.6 For the reasons outlined above it is considered that the proposed development would be acceptable and consistent with the Nationally Described Space Standards, London Plan Policies 3.5 and 7.2 and Policies H5 and DH1 of the Core Strategy.

12. **Residential Amenity**

- 12.1 Policy DH(b) of the Core Strategy requires new development, including extensions and renovations, to demonstrate that there would be no significant loss of amenity to adjacent or nearby properties, by reducing the amount of daylight, sunlight, privacy or outlook they enjoy, or by creating an unneighbourly sense of enclosure.

- 12.2 Further to the above, the Residential Extensions, Conversions and Basements Guidance SPD (2018) provides useful guidance for the determination of planning applications, especially in relation to impacts on residential amenity. The SPD sets out that developments should not result in a significant loss of privacy to gardens or main habitable rooms of nearby properties, and the degree to which a development results in overlooking will be affected by a range of factors including distance, the height of the proposed development, angles of view and directly facing windows. It further sets out that there are no specific distances required to be maintained between facing habitable rooms as the distance will be dependent on the existing character and layout of the built form in the area.
- 12.3 The back to back distance between the rear wall of the proposed dwelling and that of 28 Kings Orchard is approximately 53 metres. In view of this distance, the existing vegetation on the boundary between the two sites and the position and orientation of the sun, the proposed development would not have any adverse impact on the residential amenity enjoyed by the occupiers of this property in terms of loss of outlook, increased sense of enclosure, loss of privacy due to overlooking or a loss of daylight/sunlight.
- 12.4 With regards to 30 Kings Orchard there would be a back to back distance of approximately 21 metres between the proposed dwelling and No.30 itself. Due to this there would be no adverse impact in terms of a loss of outlook, increased sense of enclosure, loss of privacy due to overlooking or a loss of daylight/sunlight to the dwelling itself. Whilst the garden of No.30 would extend past where the proposed dwelling is to be located, as the sun is to the south the proposed development would not have any impact on the garden in terms of loss of daylight and sunlight. Due to the limited height, scale and bulk of the development, that no windows are proposed in the side elevation of the dwelling, the overall size of the garden belonging to No. 30 and established vegetation on the boundary, the development would not result in a loss of outlook, an increased sense of enclosure or a loss of privacy due to overlooking into the garden.
- 12.5 The main impacts of the proposed development would be to 55A Kingsground as a result of the proposed rear extension. Both existing and proposed dwellings would feature a 3m single storey rearward projection with a height of 2.8m. This would be built adjacent to the shared boundary with no.55A Kingsground. The depth of the single storey rear extension would be within the acceptable tolerance level set out in Council guidance which discourages single storey extensions with depth beyond 3.6m. Moreover, this element of the scheme would not be unduly high.

12.6 For the reasons outlined above it is considered that the proposed development would be acceptable and consistent with policies 7.6 of the London Plan (2016), and Policies DH(b) and H(c) of Adopted Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

13. Transport and Highways

13.1 The proposed development would provide two off-street parking spaces for the existing and proposed dwelling, which is shown on drawing no. KGD RA 01 099 (Proposed Site Plan). The site has a public transport accessibility (PTAL) rating of 2, on a scale of 1-6b, with 6b being the most accessible. As such the London Plan requires less than 1 space per unit for a 2-bed dwelling.

13.2 The application site is set back from Kingsround beyond a grassed area and permeable hard standing. A number of properties in the immediate area of the application site have off-street car parking, including No.55A, which requires vehicles to drive over the hardstanding. No such off-street parking arrangement exists for no.57a at present. The proposal development would create an off-street parking spaces for the existing and proposed dwelling respectively which would be accessed by driving over the hard standing.

13.3 As a result of the proposed off-street parking arrangements there would be no significant increase in parking stress on the road. This view is also shared by the Council's Highways Officer who have raised no objection to the proposal.

13.4 Policy 6.9 of the London Plan states that the Mayor is committed to cycling in London and to improve the experience of cycling by providing safe and attractive routes that encouraged people to cycle more. Table 6.3 of the London Plan provides cycle parking standards including for residential developments that should provide 1 cycle space per 1-bedroom unit and 2 spaces per all other dwellings. This is supported by Policy IM(c) of the Core Strategy.

13.5 The proposal would provide 2 x bicycle parking spaces which would be located to the front of the property. This would meet the above outlined standard however the bicycle parking spaces shown on submitted drawings are not detailed. A condition has been attached requiring the applicant to submit full details of cycle parking facilities to the Local Authority to be approved in writing.

14. Waste and recycling storage

- 14.1 Core Strategy Policy H5 identifies that development needs to minimise the production of waste, to promote the reuse and recycling of waste materials and to ensure that waste disposal is environmentally responsible. As such residential schemes should incorporate measures for community recycling that minimises waste disposal and should provide refuse bins and recycling boxes. This is supported by London Plan Policy 5.16.
- 14.2 Regarding refuse arrangements, the proposed plans shows designated bin storage to the side of the property. The application proposes 3 refuse bins which would be consistent with Council standards. The provision of this would be secured by condition.

15. Community Infrastructure Levy (CIL)

- 15.1 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1st April, 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 CIL will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Greenwich is £35 per square metre.

16. Royal Borough of Greenwich (CIL)

- 16.1 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.
- 16.2 The proposed development would not benefit from any exemption and would therefore be liable to this requirement.

17. Conclusion

- 17.1 The development would respect the character and appearance of the host property, street scene and adjacent conservation area and in that context would be acceptable in respect to character and appearance. The proposed development would create an acceptable living environment for the prospective occupiers and would be acceptable in respect of its impact on

the residential amenity of the neighbouring occupiers. For the reasons set out above the proposed development would be wholly acceptable.

17.2 Accordingly, it is recommended that permission be granted for application reference 20/0362/F in line with Section I of this report.

Background Papers:

National Planning Policy Framework (2019)

The London Plan (2016)

Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)

Technical Housing Standards – Nationally Described Space Standards (2015)

The Mayor of London Housing Supplementary Planning Guidance (2016).

Report Author: Fidel Miller (Planning Officer)
Tel No.: 020 8921 6438
Email: Fidel.Miller@Greenwich.gov.uk

Reporting to: Victoria Geoghegan (Assistant Director Planning & Building Control)
Tel No.: 020 8921 5704
Email: Victoria.Geoghegan@royalgreenwich.gov.uk