

Planning Board	Agenda Item: 7
16 February 2021	Reference No: 20/3933/F

Applicant: Greenwich New Builds, Royal Borough of Greenwich
Agent: Fuse Architects

Site Address: Land adjacent to 2 Green Way, Eltham SE9	Ward: Eltham West Application Type: Full Planning Application
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I. Recommendation

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

“The construction of 2no. dwellings, a 1B/2P ground floor wheelchair accessible flat and a first floor 2B/4P maisonette with associated car parking and landscaping.”

subject to:

- (i) Conditions set out in Appendix 2.
- (ii) Authorise the Assistant Director of Planning & Building Control to: make any minor changes to the detailed wording of the recommended conditions as set out in this report and its addendums, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice.

2. Summary

2.1 Detailed below is a summary of the application:

The Site -	
Site Area (m ²)	550m ²
Heritage Assets	In the vicinity of the Eltham Green Conservation Area.
Tree Preservation Order	N/A
Flood Risk Zone	N/A

Proposed Building	
Building height (metres)	8.62m
No. of storeys	2
Floor area (m ²)	142m ²

Housing		
Density	Habitable Rooms per Hectare (HRH)	91HRH
Dwelling Mix	1-bed (no. / %)	1 (50%)
	2-bed (no. / %)	1 (50%)
Affordable Housing	Social Rent (no. / %)	2 (100%)
Housing Standards	Complies with Technical housing standards – nationally described space standard and London Plan standards?	Yes

Transportation		
Car Parking	No. existing car parking spaces	0
	No. Proposed Car Parking Spaces	1
	Proposed Parking Ratio	0.5:1
Cycle Parking	No. Proposed Cycle Parking	4
	Complies with policy	Yes
Public Transport	PTAL Rating	2

Sustainability / Energy	
Renewable Energy Source (%)	76.43%

Public Consultation	
Number in Support	0
Number of objections	2
Main issues raised	<ul style="list-style-type: none"> • Parking • Design, and • Impact on adjoining residents.

- 2.2 The report details all relevant national, regional and local policy implications of the scheme, including supplementary planning guidance.
- 2.3 The applicant is the Royal Borough of Greenwich. As such, in accordance with the Royal Borough of Greenwich constitution the application is required to be determined by the Planning Board.

- 2.4 The application is considered acceptable and is recommended for approval, subject to conditions set out in the report.

Site Plan

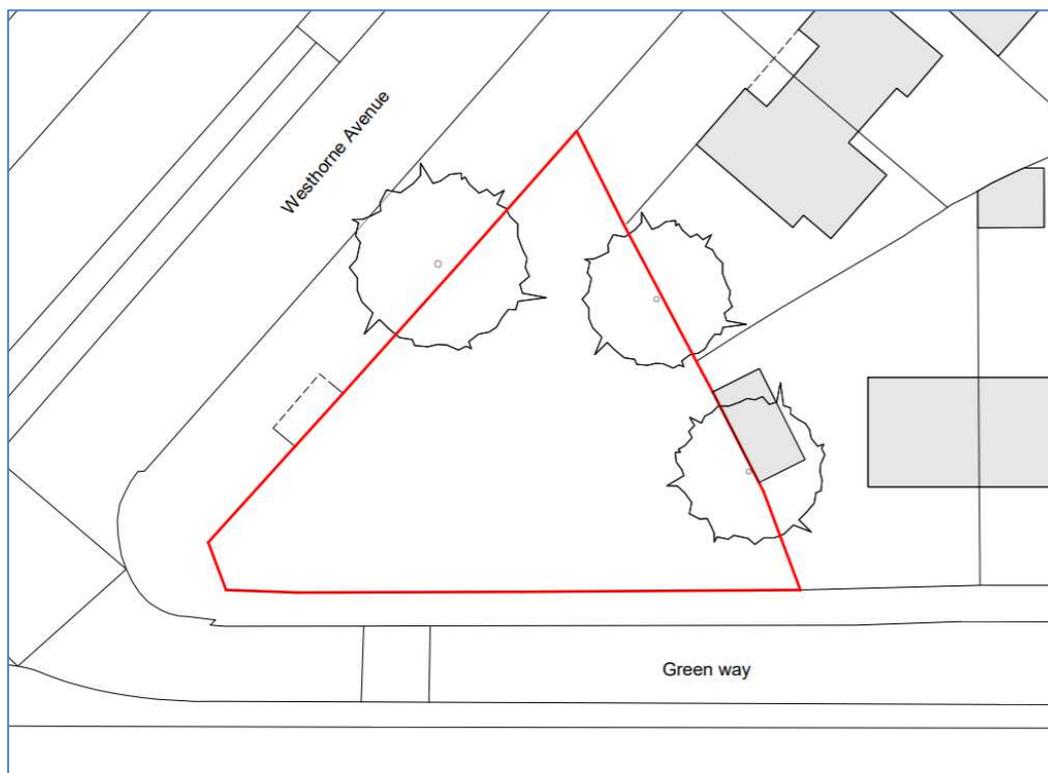


Figure 1: Existing Site Plan

3. Site and Surroundings (in detail)

- 3.1 The subject site is a 550m² roughly triangular shaped vacant lot of land, located on the corner of Green Way and Westthorne Avenue, Eltham.
- 3.2 The site consists of an open grassed area with two trees located along the western boundary, with shrubs boarding the northern and southern boundaries.
- 3.3 The surrounding area is predominantly residential in use. Eltham Green is located to the south of the site on the opposite side of Green Way.
- 3.4 The subject site is not listed, locally listed nor located within a conservation area. Eltham Green Conservation Area is located 67m to the west of the subject site.

4. Relevant Planning History

- 4.1 No relevant site history.

5. Proposals (in detail)

5.1 The current application seeks full planning permission for the following:

“The construction of 2no. dwellings, a 1B/2P ground floor wheelchair accessible flat and a first floor 2B/4P maisonette with associated car parking and landscaping.”

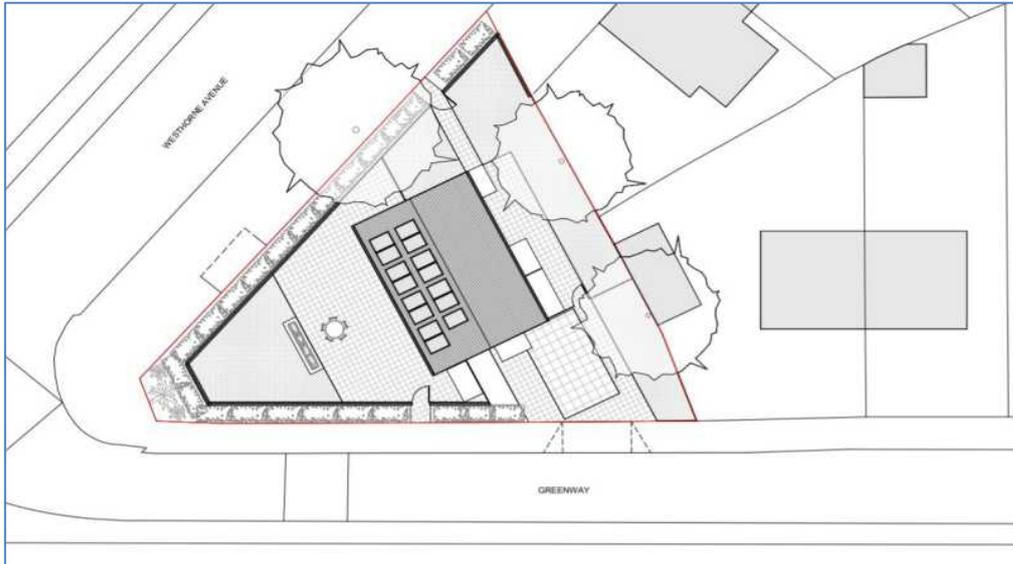


Figure 2: Proposed Site Plan



Figure 3: Proposed North Elevation (Westhorne Ave)

- 5.2 A two storey building with gable roof is proposed, to be positioned centrally within the triangular shaped lot (see figures 2 and 3).
- 5.3 One accessible parking space is proposed to be located on the southern portion of the site accessed via Green Way.
- 5.4 A low brick wall with metal railings above to a total height of 1.8m is proposed to bound the site along the boundaries of Westhorne Ave and Green Way. A 1.8m high timber fence is proposed along the boundary with no. 2 Green Way and to the rear garden adjacent to the parking space.

5.5 The proposed building and boundary wall base are to be in buff multi-toned brick, with aluminium composite doors and windows.

6. Consultation

6.1 The application since being submitted in January 2020 has been subject of public consultation, comprising of a site notice and twenty-eight (28) 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 **Statutory Consultees**

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

Details of Representation and date received	Summary of Comments	Officers comments
Transport for London (TFL)	<p>Westhorne Avenue forms part of the Transport for London Road Network (TLRN).</p> <p>Westhorne Avenue foot path and bus stop must not be blocked during development. An informative is recommended to inform applicant.</p> <p>Discussions may be required with TFL regarding impact of proposal on TFL assets including the bus shelter and street tree.</p> <p>It is recommended that a tree protection condition is imposed on any planning permission granted.</p>	<p>The requested informative and conditions are recommended to be included in any consent. See appendix 2 for full wording.</p> <p>Issues relating to Highways are assessed in section 16 of this report.</p>

6.3 Council Departments

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

Details of Representation and date received	Summary of Comments	Officers comments
Environmental Health	No response	Issues relating to environmental health are assessed in section 15 of this report.
Trees	<p>There are no TPOs on site and all trees on the site and adjoining the site are to be retained. This is acceptable.</p> <p>A condition should be added to protect the trees during the course of construction.</p> <p>The trees shall be retained and not topped lopped or pruned without prior notification from the council</p>	<p>The requested informative and conditions are recommended to be included in any consent. See appendix 2 for full wording.</p> <p>Issues relating to landscaping and biodiversity are assessed in section 18 of this report.</p>
Highway	<p>No highway objection is raised.</p> <p>It is recommended that an informative be made to consult RBG Highways over the construction of a new vehicle crossover on to Green Way</p>	<p>The highways officer was advised of the amended plans to reduce parking on site. No further comments were provided in response.</p> <p>The requested informative and conditions are recommended to be included in any consent. See appendix 2 for full wording.</p>

		Issues relating to highways are assessed in section 16 of this report.
Waste	Supports waste proposal.	Noted. Issues relating to Waste are discussed in section 16 of this report.
Occupational Therapist	<p>The ground floor wheelchair accessible dwelling should comply with the standards of Approved Document M4 category 3: wheelchair user dwellings. Compliance with M4(3) should be conditioned.</p> <p>The first floor flat would not be able to achieve compliance with M4(2).</p>	<p>Given the small scale of the development, the lack of level access to the first floor flat is considered to be acceptable.</p> <p>The ground floor flat is capable of complying with M4(3) and recommended conditions and informatives have been included in Appendix 2.</p>
Sustainability and Biodiversity	<p>Whilst the proposed scheme is generally acceptable, there are areas of improvement and measures that the applicant should consider for the development and a number of conditions are proposed to ascertain that the applicant will commit to investigate them before and during the construction of the development.</p> <p>Further information is required to demonstrate that the energy strategy is fully acceptable; however the information provided demonstrates that this can be dealt with by condition.</p>	<p>The proposal exceeds sustainability and biodiversity requirements for the development.</p> <p>Issues relating to sustainability and biodiversity are addressed in section 17 and 18 respectively.</p> <p>Conditions are proposed in Appendix 2 to ensure proposed carbon reduction and biodiversity measures are implemented as part of the development.</p>

6.5 Local Residents and Businesses

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

Summary of Comments	Officers comments
Impact of proposal on parking for residents on Westthorne Avenue and Green Lane	The proposal includes the maximum provision of on site parking. Issues relating to parking are assessed in section 16 of this report.
Proposed design not in keeping with character of area.	The proposed design is considered to be of high quality and with a pitched roof, and brick finish is in keeping with the surrounding character. Issues relating to design are assessed in section 12 of this report.
Encroachment on adjoining properties.	The proposed building would be setback a minimum of 13m from the adjoining dwellings and as such would not unacceptably impact on the amenity of adjoining properties. The impact of the proposal on adjoining dwellings are assessed in section 14 of this report.
Overdevelopment of the site.	The proposed development is in keeping with the 2 storey character of the area, and falls below the recommended development densities of the London Plan (2016). As such the proposal is considered to be an appropriate density for the site. Issues relating to density are assessed in section 10 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 – 2012)**
- **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.

7.2 ***Status of the New London Plan***

- 7.2.1 On 17 December 2019, the Mayor published the Intend to Publish version of the London Plan and issued this to the Secretary of State.
- 7.2.2 On 13th March 2020, the Secretary of State wrote to the Mayor setting out his consideration of the Mayor’s Intend to Publish London Plan and exercised his power to direct changes under Section 337 of the Greater London Authority Act 1999 (as amended).
- 7.2.3 Following the Planning Board of the 15th of December 2020, the Mayor formally approved the new Publication London Plan on the 21st December 2020. The Publication version included the responses and modifications following the Secretary of State’s directions to the Intend to Publish plan.
- 7.2.4 The Mayor has formally received confirmation from the Secretary of State that he is content for the London Plan to be published as confirmed in a letter dated 29 January 2021.
- 7.2.5 Formal publication of the new London Plan has not yet occurred and the 2016 London Plan remains the adopted plan, however the policies within the Publication London Plan have substantial weight.

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: 20/3933/F):
- Principle of Development (Section 9);
 - Density (Section 10);
 - Residential Mix and Affordable Housing (Section 11);
 - Design and Conservation (Section 12);

- Standard of Accommodation (Section 13);
- Impact on Neighbouring Amenity (Section 14);
- Environmental Health (Section 15);
- Highways and Servicing (Section 16);
- Sustainability and Energy (Section 17);
- Biodiversity (Section 18)
- Community Infrastructure Levy (CIL) (Section 19);
- RBG CIL (Section 20); and
- Implications for Disadvantaged Groups (Section 21).

9. Principle of Development

Loss of Open Space

- 9.1 The subject site is currently a grassed open area. The site is not classified as a designated site of importance for nature conservation, site of special scientific interest or ancient woodland, nor are there any priority habitats on the site. Therefore, as further discussed under section 18 'Biodiversity' below, the proposal would not result in the loss of protected habitat.
- 9.2 The subject site is currently open and accessible by the public and sits opposite Eltham Green which is classified as Metropolitan Open Land and Green Chain and forms part of a Green Corridor. However, the subject site does not form part of the green corridor, is not a designated area of open space, and is not located within an open space deficiency area in accordance with the proposal map, or core strategy policies OSI (Open space), OS(c) Public Open Space Deficiency Area and OS(g) (Green and River Corridors).
- 9.3 Policy OSI of the Core Strategy seeks to safeguard existing public open space. Policy 7.18 of the London Plan (2016) and policy G4 of the Publication London Plan advise that development should not result in the loss of protected open spaces.
- 9.4 The subject site is considered to provide poor quality open space due to its small size, awkward shape, and proximity to the A205 (Westthorne Avenue). Furthermore, the site sits opposite Eltham Green and is 200m from Sutcliffe Park which together provide 18.1h of good quality open space. As the site does not form a lawful area of community open space or green corridor and the area is not an public open space deficiency area the loss of open space is considered to cause minimal harm.
- 9.5 Whilst the proposal would result in the loss of a small area of open space, the proposal is considered to contribute positively to the Borough's Spatial Strategy by providing a growth in affordable housing whilst protecting and

enhancing the character of the area. On balance therefore the loss of the 550m² (0.06Ha) of open space is considered to be acceptable.

Housing

9.5 Paragraph 59 and 68 of the NPPF (2019) and policy HI of the Core Strategy seeks to significantly boost the supply of homes through the development of large, medium and small sites, with a presumption in favour of house building generally and sustainable development.

9.6 The application proposes two social rented homes. The site is located within a predominantly residential area, and as such the proposed land use is considered acceptable, subject to the criteria set out in policy H(c) 'backland and infill development' of the Core Strategy, which is considered below.

9.7 Policy H(c) sets out clear requirements to prevent new infill development from adversely affecting the local environment and character. Policy H(c) of the Core Strategy states the following;

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.*

9.8 The subject site currently contains informal public open space. The development of the site would not result in the loss of any private amenity space. The loss of the public open space, as discussed above however is considered acceptable. As such the proposed development would not result in the loss of residential amenity space being compliant with criteria I of policy H(c).

9.9 The proposed development includes one on-site car parking space. The use of the space would be of a similar level to neighbouring residential dwellings, the noise and disturbance of which is considered to be reasonable in a

residential area. As such the proposal is considered to comply with criteria iii of policy H(c).

- 9.10 The proposal would also be compliant with policies ii, iv and v which are considered under the headings ‘Design and Conservation’, ‘Impact on Neighbouring Amenity’ and ‘Biodiversity’ below.
- 9.11 The provision of a 100% Council owned housing scheme is also welcomed and would assist in the delivery of much needed social rented housing in the borough
- 9.12 The proposed development is therefore considered to be compliant with the above policy. The proposed residential use is in keeping with the residential character of the wider area. As such the principle of residential development is acceptable, complying with relevant London Plan policies, the Royal Borough of Greenwich policies and supplementary planning documents.

10. Density

- 10.1 Paragraph 122 of the NPPF provides national guidance on achieving appropriate densities, stating that development should make efficient use of land, taking into account: need for housing; local market conditions; availability and capabilities of existing and proposed infrastructure; the area’s character; promoting regeneration; and good design.
- 10.2 Paragraph 4.1.39 of the Core Strategy states that ‘when considering proposals for housing developments the Council will give priority to securing a high quality environment for residents and making the best sustainable use of land, having regard to the location of the site, to the individual characteristics of the site and the character of the surrounding area. The Council will utilise London Plan Policy 3.4 to guide rates for housing density in applying local context to the settings defined in the London Plan’.
- 10.3 Policy 3.4 of the London Plan seeks to ensure that the housing potential of sites is optimised and states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Table 3.2 takes into account location, existing building form, massing and Public Transport Accessibility (PTAL).
- 10.4 Based on the character and location of the site, the setting of the site is best described as “suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.” The site has a Transport Accessibility Level (PTAL), of

4. Therefore Table 3.2 of the London Plan suggests a density of between 50 and 95 dwellings per hectare or between 150 and 250 habitable rooms per hectare (HRH).

10.5 The Publication London Plan no longer uses the density matrix. Draft policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions. Publication London Plan Policies D2 and D3 advocate optimising site capacity and determining density through a design-led approach and consideration of future planned levels of infrastructure provision.

10.6 The density of the scheme based on the 550m² site area (0.055 hectares) would be 36.4 dwellings per hectare or 91 HRH. This is below the range recommended within the London Plan. However, the surrounding area is characterised by two storey, semi-detached dwellings or small terrace rows, with large front and rear gardens. As such the proposed building, which provides two dwellings is broadly consistent with the character of the area. Further, the corner of the site at the intersection of Green Way and Westhorne Avenue has been retained as garden and open space, in order to retain the open character and visibility at this junction. As further discussed in section 12 below the height, scale and bulk of the proposal is considered appropriate for the sites context. The proposed development maximises the developable area of the site and is therefore considered to optimise the potential for housing delivery on the site being in accordance with the Publication London Plan policies.

11. **Residential Mix and Affordable Housing**

11.1 London Plan Policy 3.8 and Policy H2 'Housing Mix' of the Core Strategy encourages a full range of housing choice. The exact mix on each site will vary according to a number of factors including the location of the development, the character of the surrounding area, Public Transport Accessibility level (PTAL) and external environment.

11.2 The current application seeks the following housing mix:

Unit type / size	Total (%)
1-bed	1 (50%)
2-bed	1 (50%)
Total	2 (100%)

11.3 The proposed unit types is considered acceptable considering the sites constraints.

11.4 Whilst there are no policy requirements for the provision of affordable housing within schemes of the proposed size, the provision of socially rented housing is especially welcomed.

12 Design and Conservation

Design

- 12.1 Policy 7.4 and 7.6 of the London Plan (2016) and Policy H(c) and DH1 of the Core Strategy (2014) requires development to be of a high quality architectural design, contribute to a positive relationship between the built form and the natural features of a site and promote local distinctiveness by providing a site-specific design solution.
- 12.2 Policy D1 of the Publication London Plan expects new developments to respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to local character. Policy D2 of the draft London Plan places further weight on this process, requiring a clear understanding of the existing local context, including townscape, block pattern and urban grain, to form the basis of any proposal.
- 12.3 The site's surrounding area is characterised by two storey residential development in semi-detached pairs or small terraced rows, with large gardens. Buildings are generally brick, with rendered or mock-Tudor wooden cladding on the upper floors.
- 12.4 The applicant seeks consent for the construction of a two storey building with gable roof. The building is to be positioned to front the junction of Green Way and Westhorne Avenue, with the gable ends facing Green Way and Westhorne Avenue to the north and south.
- 12.5 The building is to have a ridge height of 8.6m. This is approximately 1.2m taller than that of the neighbouring houses. This additional height compared to the neighbouring buildings is considered acceptable given the prominent position of the building at the street junction, where it would act as a gentler marker.
- 12.6 The building is to be finished in a buff multi-tone face brick. Stack and soldier coursing is proposed to frame the window and door frames as well as soldier course banding to articulating the façade. Aluminium composite windows and doors are also proposed. Subject to the submission of samples and approval of materials, the proposed design would be of an acceptable quality and is

supported. A condition to this effect is recommended in Appendix 2 of the report.

- 12.7 The site would be subdivided to the east and west of the proposed building to provide two private gardens. Boundary walls and planting are proposed to provide privacy to occupants.
- 12.8 The overall design of the housing is therefore acceptable. As such the proposal complies with relevant policies of the London Plan, Publication London Plan and Core Strategy.

Conservation

- 12.9 Policies DH3 and DH(h) of the core strategy ask that proposals pay special attention to preserving or enhancing the character or appearance of heritage assets. This is supported by Policy 7.8 of the London Plan (2016) and policy HCI of the Publication London Plan.
- 12.10 The site is located approximately 65m to the east of the western boundary of Eltham Green Conservation Area. Eltham Green Conservation Area contains 15 homes which front the northern portion of Eltham Green. The site is separated from the conservation area by the southern portion of Eltham Green as well as the four lane Westhorne Avenue (A205). The small scale of the development and separation distance is such that the proposed development would not harm the settings of the conservation area and the proposal would preserve its character.

13. Standard of Accommodation

- 13.1 The current application seeks permission for 2 residential units, consisting of a one-bed wheelchair accessible unit and a two-bed unit.
- 13.2 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:

Flat Type	Nationally Described Space Standard's	Proposed units (m²)
One Bedroom, two people	50m ²	71.5m ²
Two bedroom, four people	70m ²	70m ²

- 13.3 The ground floor, one bedroom flat is to be wheelchair accessible and has been designed to comply with part M4(3)b of the Building Regulations, Approved Document M (Volume 1: Dwellings). The Council's Housing Occupational Therapist has reviewed the layout of the proposed wheelchair user dwellings and in principle agree that the details can meet the requirements of Approved Document M4. However, there are specific details within these requirements that are not currently met within the proposed development. Therefore, relevant conditions are recommended be attached to any permission given to ensure full compliance (see appendix 2 for details).
- 13.4 The London Housing SPG states that a minimum ceiling height of 2.5 metres for at least 75% of the gross internal area is strongly encouraged. The floor to ceiling heights will be at least 2.5m across all rooms within the development and therefore meets this requirement.
- 13.5 Both units are multi aspect and would therefore have a good level of light and ventilation, creating a good standard of internal amenity for future occupants.
- 13.6 Standard 26 of the Mayor's Housing SPG states that 'a minimum of 5sq.m of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant'. Policy H5 of the Core Strategy states that in flats a good-sized balcony, a terrace or enclosed communal gardens should be provided. The proposed dwellings would each have large private gardens in excess of 100m². These would provide high quality outdoor spaces for future occupants being compliant with policy.
- 13.7 Based on the detailed review of all aspects relating to the quality of accommodation for the proposed residential units' officers consider the standard proposed, both internally and externally, are acceptable for all future occupants of the proposed development.

14. Impact on Neighbouring Amenity

- 14.1 Policy 7.6 'Architecture' of the London Plan 2016 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing etc. Policy DH(b) 'Protection of Amenity for Adjacent Occupiers' of the Core Strategy 2014 states that new development 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.

- 14.2 Policy D3 and D4 of the Publication London Plan requires development to deliver appropriate outlook, privacy and amenity as part of a design led approach and confirms the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 14.3 The impact of the proposed development on surrounding properties is considered in turn below.

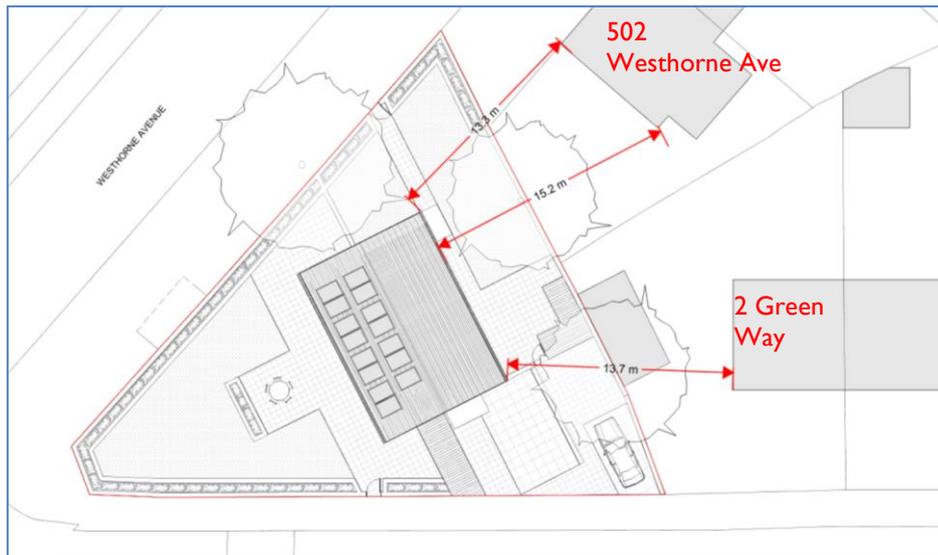


Figure 4: Separation Distances

2 Green Way

- 14.4 The subject site is adjoined along its eastern boundary by the western boundary of 2 Green Way. 2 Green Way contains a two-storey semi-detached dwelling. The dwelling contains two first floor windows on its west facing side elevation, which would overlook the subject site.
- 14.5 The proposed development would contain 2 small first floor windows on its eastern façade. The building has been positioned so that the windows would not directly face those of 2 Green Way and as such there would be no direct overlooking between the two dwellings. In addition the 13.7m separation distance between the two dwellings is such that any oblique overlooking would be acceptably mitigated. The proposed kitchen window of the first floor flat would overlook the rear garden of 2 Green Way, however it would be setback 6m from the shared boundary, which is considered adequate to mitigate any direct overlooking, and is considered to be an acceptable distance within the site's urban context.

- 14.6 The proposed 6m setback from the boundary of 2 Green Way, is considered to be adequate to retain an acceptable sense of openness and outlook for the residents of 2 Green Way.
- 14.7 A daylight and sunlight assessment in accordance with the 'BRE guide' was prepared by EB7 (dated 17/12/2020). It demonstrated that the proposed development would retain good levels of daylight and sunlight to No. 2 Green Way meeting all relevant BRE criteria. An assessment of the impact of the proposal on the garden of No.2 Green Way was not undertaken due to its orientation in relation to the site. However the consultant has confirmed that the sunlight on the ground will remain unaffected by the proposal.

502 Westhorne Avenue

- 14.8 The subject site is also adjoined along its eastern boundary by the western boundary of 502 Westhorne Avenue. 502 Westhorne Avenue contains a two-storey semi-detached property located to the north-east of the site. The western elevation of 502 Westhorne Avenue contains two small windows at the first floor.
- 14.9 The proposed building is to be setback from the boundary of 502 Westhorne Avenue by 6m, and would have a window to window separation distance of 15m. First floor windows have been positioned so that they would not directly face those of 502 Westhorne Avenue. A window serving the stairwell of the first floor flat would overlook the rear garden of 502 Westhorne Avenue. As the window would be setback 6m from the boundary and serves a stairwell, being a transient space, this overlooking is considered to be limited and is acceptable within the site's urban context.
- 14.10 Furthermore, an approximately 9m high tree (T2 - Robinia pseudoacacia' 'False Acacia') located on the boundary between the buildings is to be retained and would provide some screening between the two properties, particularly in the summer months.
- 14.11 The small scale of the development and reasonable setback from 502 Westhorne Avenue would retain an acceptable sense of openness and outlook for the residents of 502 Westhorne Avenue.
- 14.12 A daylight and sunlight assessment in accordance with the 'BRE guide' was prepared by EB7 (dated 17/12/2020). It demonstrated that the proposed development would retain good levels of daylight and sunlight to 502 Westhorne Avenue meeting all relevant BRE criteria. An assessment of sunlight amenity (overshadowing) within the rear garden of 502 Westhorne Street demonstrated that the proposal would retain sufficient levels of

sunlight, very close to the existing conditions meeting BRE guidelines. The proposed development is therefore considered to have a minimal and acceptable impact on the daylight and sunlight of 502 Westthorne Avenue.

14.13 It is therefore considered that the design, scale and positioning of the dwellings would not unacceptably impact upon residential amenity in terms of loss of privacy, loss of outlook, sense of enclosure or an adverse loss of sunlight / daylight.

14.14 As such, the proposal is considered to comply with policy 7.6 of the London Plan, policy D4 the Publication London Plan and policy DH(b) of the Core Strategy.

15. Environmental Health

15.1 London Plan policies 5.21, 7.14 and 7.15 seek to manage potential impacts concerning contaminated land, air quality, and noise emissions.

15.2 Core Strategy policy E(a) states that development should not have an adverse effect on the amenities of adjacent occupiers or users including unacceptable emissions of noise, light, vibration, odours, fumes, dust, water and soil pollutants or grit.

Site contamination

15.3 As there is no evidence of the site being previously in commercial or agricultural use, a phase I contamination investigation is not required. However, contamination conditions relating to undertaking an unexploded ordnance (UXO) risk assessment and unexpected contamination on site (see appendix 2 for full wording).

Impact during construction

15.4 Construction noise impacts would be controlled through a construction method statement and a condition limiting hours of demolition and construction to 08:00 to 18:00 hours Monday to Friday, and 08:00 to 13:00 hours on Saturdays, with no noisy working audible at the site boundary being permitted on Sundays or Bank Holidays. It is recommended that a condition requiring reference to the Councils' Construction Site Noise Code of Practice be included (see appendix 2 for full wording).

Impact of proposed development:

- 15.5 The proposed development includes one on-site car parking space, the use of which would be of a similar level to neighbouring residential dwellings. The noise and disturbance of one car accessing the site is considered to be reasonable in a residential area and would not have an adverse effect on the amenity of adjoining occupiers.
- 15.6 Subject to the implementation of the recommended conditions the proposed development is considered to be acceptable with regards to Environmental Health.

16. Highways and Servicing

Parking

- 16.1 London Plan Policy 6.13 sets out maximum parking standards for residential dwellings. The London Plan 2016 sets a maximum parking standard of less than 1 space per unit. The Publication London Plan Policy T6.1 sets maximum parking standards, requiring sites with a PTAL of 2 of up to 0.5 spaces per dwelling.
- 16.2 Amended plans were submitted by the applicant reducing the proposed on site parking by one space, so that one accessible parking space is to be provided on site. This complies with the maximum parking standards of the London Plan (2021) and would serve the accessible unit.
- 16.3 Cycle parking has been provided within the private amenity space of each unit. Two spaces are to be provided per unit in-line with the minimum standards set out in the London Plan.
- 16.4 The proposal was reviewed by Council's Highway Manager who raised no objection to the scheme.

Waste

- 16.5 With regards to waste and servicing, bins are to be provided for both units and are proposed to be collected from Green Way. The arrangement was reviewed by Council's Waste Services who raised no objections.
- 16.6 The proposed highways, servicing and parking arrangements are therefore acceptable and accommodate the needs of existing and proposed residents within the constraints of the site without unduly impacting the surrounding road network.

17. Sustainability and Energy

- 17.1 London Plan (2016) policy 5.1, 5.2 and Policy E1 of the Core Strategy (2014) seeks an overall reduction in carbon dioxide emissions with a target for residential buildings to be zero carbon and compliance with the London Plan Energy Hierarchy.
- 17.2 The submitted energy statement prepared by SCMS Associates (dated December 2020) states that the proposed development would achieve a 106.07% reduction in carbon emissions beyond Part L 2013 complaint baseline due to the use of renewable energies and other energy demand reduction technologies utilised in accordance with the London Plan Energy Hierarchy.
- 17.3 The development would be fitted with 5.55 kWp photovoltaic panels. Individual Air Source Heat Pumps (ASHPs) (SCoPheating 2.9) are proposed to provide space heating and hot water to each dwelling. The reducing in energy demand are broken down across the London Plan Energy Hierarchy as follows;
- Be Lean (29.63%) – fabric and services efficiency measures
Be Green (76.43%) – Air source heat pumps and photovoltaic panels
- 17.4 This is welcomed and far exceeds the 35% minimum requirement. Full details of how this would be achieved would be secured by condition (refer to appendix 2 for the full wording).
- 17.5 Subject to the recommended conditions (see appendix 2 for full wording), the proposal would comply with the relevant sustainability policies and is acceptable.

18. Biodiversity

- 18.1 Policy 5.10 and 7.19 of the London Plan (2016), and policy OS4 of the Core Strategy (2015) seek wherever possible to ensure that development makes a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 18.2 The subject site is predominantly grass, with some shrubs and a hedgerow along the western boundary. Two trees (an ash and a sycamore) are located on the eastern boundary.

- 18.3 The existing shrubs and hedgerows are proposed to be retained with additional shrubs planted to create a consistent hedge around the boundary of the site. Both trees on site are also to be retained.
- 18.4 An Ecology Report prepared by Microbee Environmental (dated December 2020) was submitted in support of the application. An Extended Phase 1 Habitat Survey was carried out which identified the site as having low biodiversity value in regards to both habitat and suitability for protected species.
- 18.5 The report advised that the site has negligible potential for bats and as such no further surveys are required. It also advised that nesting birds were unlikely to be encountered on site. However, the report advised best practice methodology must be adopted during construction to ensure protection of protected species.
- 18.6 The report recommends ecological enhancements be introduced to improve biodiversity on site, including the installation of bird, bat and invertebrates boxes, sensitively designed lighting to protect bats, and the use of diverse mix of native species of trees and shrubs, include species which support local taxa. These measures to enhance the development's biodiversity should be provided and it is recommended to be secured by condition (see appendix 2 for full wording).
- 18.7 The proposed development would not result in the significant loss of wildlife habitats. Subject to the inclusion of ecological enhancements and the retention and protection of trees the proposal would result in a net positive increase in biodiversity on site, being consistent with the relevant policies.

19. Community Infrastructure Levy (CIL)

- 19.1 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.
- 19.2 The current application is liable to this requirement, however as the proposal is for affordable housing would be eligible for an exemption

20. RBG CIL

- 20.1 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.
- 20.2 The current application is liable to this requirement, however as the proposal is for affordable housing would be eligible for an exemption.

21. Implications for Disadvantaged Groups

- 21.1 The implications for disadvantaged groups identified below are an integral part of the consideration of the development and community benefits as set out in the report:
- The proposal would provide one M4(3)(b) wheelchair accessible unit,
 - The proposal would provide two affordable housing units to be leased at social rents.

22. Conclusion

- 22.1 Having regard to the above assessment the principle of residential development is considered to be acceptable.
- 22.2 Overall the design quality is considered to be of an excellent standard and would respect the character and appearance of the surrounding area.
- 22.3 The proposal would provide a high standard of residential accommodation which meets all internal spaces standards.
- 22.4 The provision of affordable and accessible units is welcomed.
- 22.5 Accordingly, it is recommended that permission be Granted for application reference 20/3933/F, in line with Section I of this report.

Background Papers:

National Planning Policy Framework (2019)

Planning Practice Guidance

The London Plan (2016)

Minor Alterations to the London Plan (March 2016)

The London Plan (2021)

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

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