

**PLANNING BOARD**~~6 July 2021 20 July 2021 28 July 2021~~**Agenda Item: 6 4****Reference No: 21/0511/F****Applicant:** Greenwich Builds**Agent:** Fuse Architects**Site Address:**Garage Site adjacent to Condover  
Crescent, London, SE18**Ward:** Shooters Hill**Application Type:** Full Planning  
Permission**1.0 Recommendation**

1.1 The Board is requested to Grant Planning Permission as outlined below subject to:

Demolition of existing garages and the construction of two buildings to provide residential accommodation (Use Class C3) together with associated landscaping and parking

1.2 subject to:

- i. Resolve to grant conditional planning permission according to the conditions in appendix 2 to be detailed in the notice of determination.
- ii. Authorise the Assistant Director of Planning & Building Control to:
  - a. 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.

**2.0 Summary**

2.1 The application is submitted by the Royal Borough of Greenwich and forms part of the Council's programme of building homes for social rent across the borough.

2.2 Detailed below is a summary of the application:

<b>The Site</b>	
Site Area	0.089 ha
Heritage Assets	None
Flood Risk Zone	1
PTAL Rating	1b
CPZ	None

<b>Housing</b>	
Dwelling Mix (8 total)	6 no. 1bx2p flats 2 no. 2bx4p flats
Affordable housing/ Tenure	Social Rent 100%
Complies with housing standards?	Yes

<b>Transport</b>	
Car Parking	8
Cycle Parking	10
Complies with policy	Yes

<b>Public Consultation</b>	
Number in support	2
Number of Objections	22
Main issues raised (addressed within section 6 of the report)	<ul style="list-style-type: none"> <li>• Impact on amenity</li> <li>• Parking</li> <li>• Fire Access</li> <li>• Design</li> <li>• Consultation</li> <li>• Boundary treatment</li> <li>• Subsidence</li> <li>• Noise</li> <li>• Parking</li> <li>• Impact on safety of children</li> <li>• Impact on adjacent greenspace</li> <li>• Access during construction</li> </ul>

- 2.3 As well as the number of objections, due to the applicant being the Royal Borough of Greenwich the application is required to be determined at Planning Board.
- 2.4 This report details all relevant national, regional and local policy implications of the scheme, including supplementary planning guidance.
- 2.5 The application is considered acceptable and is recommended for approval subject to the conditions set out in this report.

### **3.0 Site and Surroundings**

- 3.1 The application site is rectangular in shape sloping from south-east to north-west and accessed from Condover Crescent at the southern end. It consists of predominantly of hardstanding together with a single row of 16 garages which backs onto the north-eastern boundary.
- 3.2 Adjoining the site to the north is a private green space and 3 storey flats and to the south there is a rear path which packs onto the rear gardens belonging to the two storey properties on Moordown.

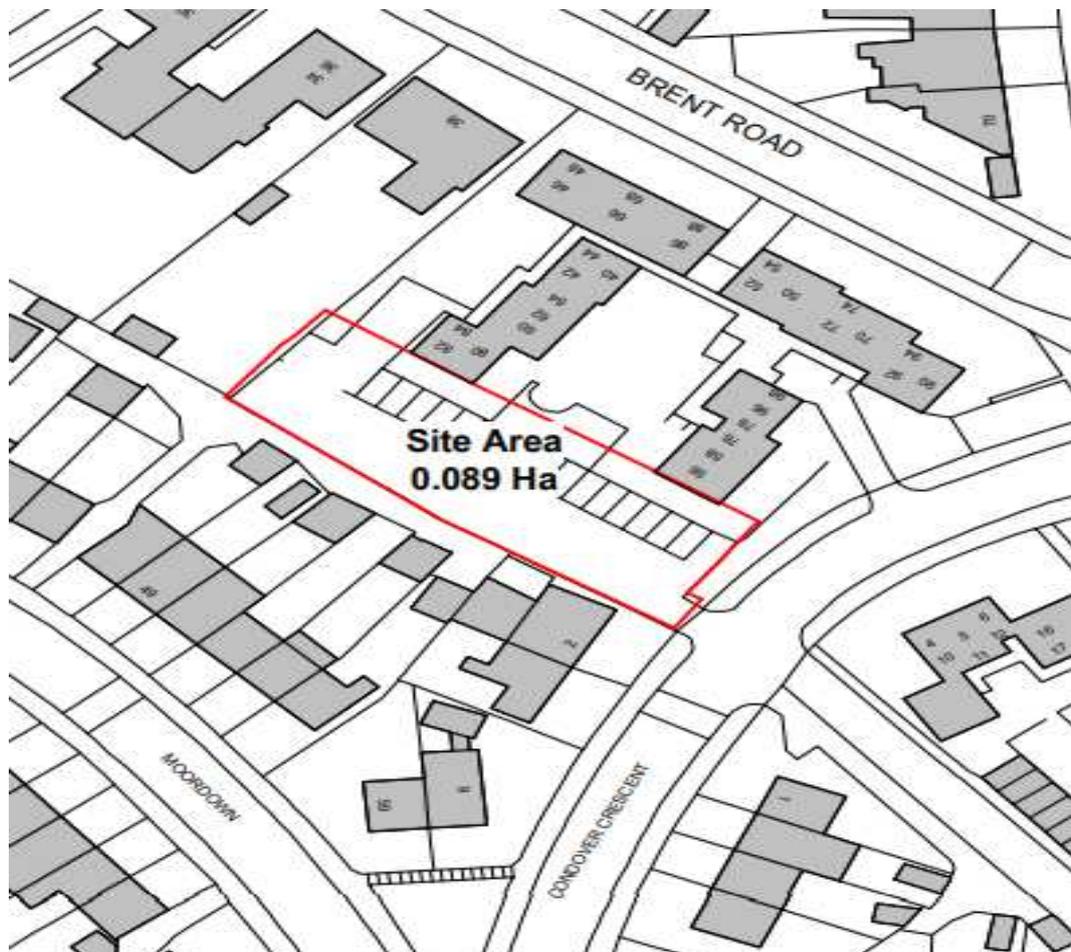


Figure 1 Site Location Plan

- 3.3 The existing built context is primarily residential: a mixture of Victorian, Edwardian, inter-war and post-war houses and flats 2- 4 storeys in height.
- 3.4 The application site has a Public Transport Accessibility Level (PTAL) of 1b and is not in a controlled parking zone (CPZ). The site is also in a flood risk zone of 1 which indicates a low risk of river flooding.

**4.0 Relevant Planning History**

- 4.1 No relevant planning history.

**5.0 Proposal**

- 5.1 The proposed development is for the demolition of the existing garages and the construction of two buildings to provide residential accommodation (Use Class C3) together with associated landscaping, 8 parking spaces and 10 cycle parking spaces.
- 5.2 The proposed buildings would be arranged in two rows and adjoin the existing flats located at 40- 96 Brent Road.



Figure 2 Proposed Ground Floor Plan

5.3 A total of 8 units are proposed consisting of the following mix:

**Accommodation Schedule**

1 Bedroom 2 Flat (50m <sup>2</sup> min.)	:	6 no.
2 Bedroom 4 Person Flat (71m <sup>2</sup> min.)	:	2 no.
<b>Total</b>	:	<b>8 no.</b>

*Table 1 Proposed unit mix*

5.4 The proposed development would be 2- 3 storeys high with flat roofslopes, consistent with the adjoining properties to the north. The proposed materials would consist of a mix of light and dark brown brick which would complement the dark brown brick of the adjoining flats at Condover Crescent, with light brown metal window frames, balustrades and PV panels.

5.5 A planted trellis is also proposed on the southern elevation, together with the replacement of the existing timber fence and making good of the brick retaining wall on the southern boundary with the properties on Moordown.



*Figure 3 Proposed CGI Front Elevation*

5.6 All units would be built to Building Regulations M4(1) and M4(2), provided at affordable social rents and managed by the Council.

## **6.0 Consultation**

6.1 The current application has been subject to two rounds of public consultation. A meeting was also held with local residents on

14/04/2021 in response to a request from local residents to meet with officers and the applicant.

6.2 At the meeting residents raised concerns regarding overlooking, overbearing, subsidence and the suitability of the existing boundary treatment on the southern boundary of the site. In response to these comments the applicant has revised the proposed development and the following amendments have been made:

- All windows on the flank elevation to be obscure glazed to obscure views to the south
- Balconies on the second floor to incorporate screening to obscure views to the south
- Planted trellis on the flank elevation to reduce overbearing impact. A green wall was requested however the applicant has stated this option was not practical due to cost implications
- Replacement of existing southern timber boundary fence with a 1.8m and 200mm trellis
- Making good of existing retaining wall

6.3 It should be noted that the installation of a green wall and excavation of the site to reduce the height of the proposed development was requested. The applicant has explored these options and has stated that due to cost implications this would not be feasible.

6.4 The first round of public consultation comprised a site notice and 70 letters which were sent to individual occupiers in the vicinity of the application site. The second round comprised 70 letters being sent to individual occupiers in the vicinity of the application site. In total 21 objections have been received.

6.5 Eleven (11) objections were received in response to the first round of consultation from residents which are summarised below together with officer comments in the below table.

6.6 Ten (10) objections were received in response to the second round of consultation from residents which are also summarised below together with officer comments.

### **Neighbour Responses from first round of consultation**

<b>Summary of resident objections</b>	<b>Officers comments</b>
<ul style="list-style-type: none"><li>• Overbearing, overlooking and loss of privacy</li></ul>	<ul style="list-style-type: none"><li>• All windows and terraces on the flank elevation would be obscured to prevent</li></ul>

	<p>overlooking which was secured as part of the residents meeting held on 14/04/2021. A planted trellis has also been included to mitigate overbearing impacts. These measures together with the proposed separation distances and 2-3 storey height would mitigate significant overbearing impacts and loss of privacy.</p>
<ul style="list-style-type: none"> <li>Daylight and sunlight impact to existing properties</li> </ul>	<ul style="list-style-type: none"> <li>Daylight and sunlight impacts are assessed in section 13 of this report and all impacts would fall within BRE guidelines.</li> </ul>
<ul style="list-style-type: none"> <li>Impact on views</li> </ul>	<ul style="list-style-type: none"> <li>The proposed development is not of a height which would impact surrounding views and is in keeping with the area</li> </ul>
<ul style="list-style-type: none"> <li>Height should be 2 storeys</li> </ul>	<ul style="list-style-type: none"> <li>The 2/3 storey height is in keeping with surrounding buildings and would therefore complement the area</li> </ul>
<ul style="list-style-type: none"> <li>Design not in keeping with the area</li> </ul>	<ul style="list-style-type: none"> <li>The stepped height, materials and massing would complement the surrounding buildings in the area taking reference from the flats on Brent Road and houses on Moordown</li> </ul>
<ul style="list-style-type: none"> <li>Noise from traffic, households and building</li> </ul>	<ul style="list-style-type: none"> <li>The proposed development being residential in nature would not generate significant or unexpected noise impacts and would be in keeping with the surrounding residential area</li> </ul>
<ul style="list-style-type: none"> <li>Access issues during construction</li> </ul>	<ul style="list-style-type: none"> <li>A full construction management plan is to be secured by condition which would ensure that suitable</li> </ul>

	access is proposed. (see appendix 2 for full wording).
<ul style="list-style-type: none"> <li>• Fire Access</li> </ul>	<ul style="list-style-type: none"> <li>• There is sufficient space for service vehicles to enter the centre of the site. The London Fire Brigade has been consulted and have raised no objections.</li> </ul>
<ul style="list-style-type: none"> <li>• Loss of parking and parking impacts</li> </ul>	<ul style="list-style-type: none"> <li>• There is sufficient parking space proposed in the area to accommodate parking demand for a scheme of this size and also any displacement. Parking is discussed in further detail in section 14 of this report.</li> </ul>
<ul style="list-style-type: none"> <li>• Boundary fences should be repaired, and boundary treatments detailed</li> </ul>	<ul style="list-style-type: none"> <li>• As shown in drawing no. PL02 Rev C, the proposed development includes the replacement of the existing southern timber boundary fence with a 1.8m and 200mm trellis and the making good of existing retaining wall.</li> </ul>
<ul style="list-style-type: none"> <li>• Drop in land levels would cause health and safety issues and subsidence may occur</li> </ul>	<ul style="list-style-type: none"> <li>• A full survey of ground conditions and mitigation measures if necessary, to prevent subsidence would be secured by condition. See appendix 2 for full wording.</li> </ul>
<ul style="list-style-type: none"> <li>• Impact on adjacent green space</li> </ul>	<ul style="list-style-type: none"> <li>• The adjacent green space does not form part of the application proposals</li> </ul>
<ul style="list-style-type: none"> <li>• Impact on safety of children</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed development being residential in nature does not pose a risk to the safety of children</li> </ul>
<ul style="list-style-type: none"> <li>• The public consultation process nature, dates held and access to plans held online between the 23 December 2020 and 4 January 2021, did not provide adequate opportunity for resident feedback.</li> </ul>	<ul style="list-style-type: none"> <li>• The council has met all statutory consultation requirements and has held 2 rounds of public consultation as well as a meeting with local residents.</li> </ul>

## Neighbour Responses from second round of consultation

Summary of resident objections	Officers comments
<ul style="list-style-type: none"> <li>Proximity to boundary, height and difference in ground levels and impact on overbearing and overlooking</li> </ul>	<ul style="list-style-type: none"> <li>All windows and terraces on the flank elevation would be obscured to prevent overlooking which was secured as part of the residents meeting held on 14/04/2021. A planted trellis has also been included to mitigate overbearing impacts. These measures together with the proposed separation distances and 2-3 storey height would mitigate significant overbearing impacts and loss of privacy.</li> </ul>
<ul style="list-style-type: none"> <li>Building design and proposed materials are not in keeping with existing buildings</li> </ul>	<ul style="list-style-type: none"> <li>The stepped height, materials and massing would complement the surrounding buildings in the area taking reference from the flats on Brent Road and houses on Moordown</li> </ul>
<ul style="list-style-type: none"> <li>Changes to boundary fence should be included in the proposal</li> </ul>	<ul style="list-style-type: none"> <li>As shown in drawing no. PL02 Rev C, the proposed development includes the replacement of the existing southern timber boundary fence with a 1.8m and 200mm trellis and the making good of existing retaining wall.</li> </ul>
<ul style="list-style-type: none"> <li>Application site may have subsidence issues</li> </ul>	<ul style="list-style-type: none"> <li>A full survey of ground conditions and mitigation measures if necessary, to prevent subsidence would be</li> </ul>

	secured by condition. See appendix 2 for full wording.
<ul style="list-style-type: none"> <li>• Fire access issues</li> </ul>	<ul style="list-style-type: none"> <li>• There is sufficient space for service vehicles to enter the centre of the site. The London Fire Brigade has been consulted and have raised no objections.</li> </ul>
<ul style="list-style-type: none"> <li>• Loss of parking and impact on the area</li> </ul>	<ul style="list-style-type: none"> <li>• There is sufficient parking space proposed in the area to accommodate parking demand for a scheme of this size and also any displacement. Parking is discussed in further detail in section 14 of this report.</li> </ul>
<ul style="list-style-type: none"> <li>• Increase in noise cause by parking</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed development being residential in nature would not generate significant or unexpected noise impacts and would be in keeping with the surrounding residential area</li> </ul>
<ul style="list-style-type: none"> <li>• Builders may use adjacent land to access site during construction</li> </ul>	<ul style="list-style-type: none"> <li>• A full construction management plan is to be secured by condition which would ensure that suitable access is proposed. (see appendix 2 for full wording).</li> </ul>

### Statutory Consultees

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

Consultee	Summary of Comments	Officer's comments
<b>Thames Water</b>	No comment	Noted
<b>London Fire Brigade</b>	No objections. The proposed development should comply with Part 5 of the current Building regulations approved document.	Noted. This is to be included as an informative. See appendix 2 for further details.

## **Council Departments**

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

<b>Consultee</b>	<b>Summary of Comments</b>	<b>Officers comments</b>
<b>Highways</b>	No objections raised.	Noted
<b>Waste</b>	No objections raised.	Noted
<b>Land Contamination</b>	No objections subject to a condition requiring further intrusive investigation works and gas survey.	Noted. This is to be included as a condition. See appendix 2 for further details.
<b>Occupational therapists</b>	No objections, the scheme is to meet Approved Document M (Volume 1: Dwellings) and M4(2).	Noted. This would be secured by condition. See appendix 2 for further details.

## **7.0 Planning Context**

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

- National Planning Policy Framework (2019)
- Technical Housing Standards – Nationally Described Space Standard (Department for Communities and Local Government – March 2015)
- London Plan (2021) - 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.

## **8.0 Material Planning Considerations**

- 8.1 The following section details the main planning considerations in the determination of this application:
- Principle of development
  - Housing
  - Design

- Standard of accommodation
- Impact on neighbouring amenity
- Highways and servicing
- Biodiversity
- Environmental Health
- Sustainability
- Community Infrastructure Levy (CIL)
- RBG CIL
- Implications for Disadvantaged Groups

## **9.0 Principle of development**

9.1 The application is submitted by the Royal Borough of Greenwich and forms part of the Councils large-scale programme of building homes for social rent across the borough. By 2022, 750 homes are planned to be delivered with the Council currently identifying more sites to develop in the future.

### *Loss of garages*

- 9.2 Core Strategy policy IM(b) and (c) and London Plan (2021) policy T6 seek to implement the minimum levels of car parking necessary. The relevant policies do not identify garages as protected land uses and as such the loss of the garages is supported subject to development not causing negative impact upon the highway network and parking.
- 9.3 Of the 16 garages on site two were previously used for parking however these residents were given alternative garages in 2019. The results of the submitted parking survey showed that there were 4 cars parked outside the garages on the hardstanding resulting in up to 4 vehicles being displaced onto the surrounding roads.
- 9.4 Whilst it is possible that the proposed 8 parking spaces could provide spaces for existing residents if not entirely taken up by the proposed residential units, the submitted parking survey also shows that there are between 14- 17 parking spaces available within 200 metres of the proposed site.
- 9.5 The availability of parking spaces around the site and potentially as proposed are therefore sufficient to accommodate the proposed parking need of the development and any displaced parking.

- 9.6 As such the loss of the garages is acceptable and the proposed development would not significantly impact parking levels in the surrounding area.

### *Housing*

- 9.7 The National Planning Policy Framework (NPPF) requires the delivery of a wide choice of high-quality homes and to boost significantly the supply of housing. The Core Strategy (2014) sets a housing delivery target of 2,595 per year with the London Plan setting a target of 2,824 per year.
- 9.8 20,000 households are also on the Council waiting list across 1 bed units, 2 bed units and family housing. It is clear therefore that there is significant demand for housing and in particular social housing across the borough which is not currently being met.
- 9.9 Policy H(c) sets out clear requirements to prevent new infill development from adversely affecting the local environment and character.
- 9.10 The application proposes 8 social rented homes. As the application site is a brownfield site location within a residential area and has no site allocations, the principle of residential development is accepted. 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.
- 9.11 It should be noted that as the scheme provides under 10 units this will not be formally secured as affordable housing through condition, however as the applicant is the Greenwich Builds team their intention is clear that this is to be delivered as social rented housing.
- 9.12 In accordance with Policy H(c) and as detailed further in this report the proposed development would not result in a reduction of neighbouring amenity spaces, a loss of privacy/ overlooking, unreasonable increase in noise and disturbance from traffic or significant loss of wildlife habitats. The character of the area would also be maintained.
- 9.13 The principle of development comprising the loss of garages and residential development on an infill site is therefore considered to be acceptable.

### **10.0 Housing**

- 10.1 Policy H2 of the Core Strategy encourages a full range of housing choice and policy H3 states that affordable housing should be provided for developments of 10 or more.
- 10.2 As the scheme falls below 10 units there is no policy requirement regarding the unit mix or tenure, however the proposed mix would meet an identified housing need in the borough and the provision of social housing is also welcomed.
- 10.3 As such the proposed development is acceptable with regards to housing mix.

## **11.0 Design**

- 11.1 The NPPF, Policies D3, D4 and D5 of the London Plan (2021) and policies H(c) and DH1 of the Core Strategy (2014) requires new dwellings to be of high quality and enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape.
- 11.2 The proposed dwellings would have flat roofslopes, consistent with the adjoining flats at Conover Crescent and would be constructed in a mix of light and brown brick with light brown balustrades and metal windows. The blocks would be arranged in two sperate rows and adjoin the existing 3-storey flats located at Brent Road.
- 11.3 The proposed materials and roof form would be similar to the existing dwellings on Conover Crescent however interpreted in a contemporary and complementary design. This is expressed in the use of two different brick tones, incorporation of floor to ceiling height windows and metal balustrades. A glazed core is also proposed which highlights the transition between the existing flats and adjoining new development.
- 11.4 The massing and height would be similar to the adjoining flats on Conover Crescent whilst also incorporating a step down in height from 3 to 2 storeys on the southern flank which acknowledges the drop in land levels and transition to 2 storey semi- detached dwellings.

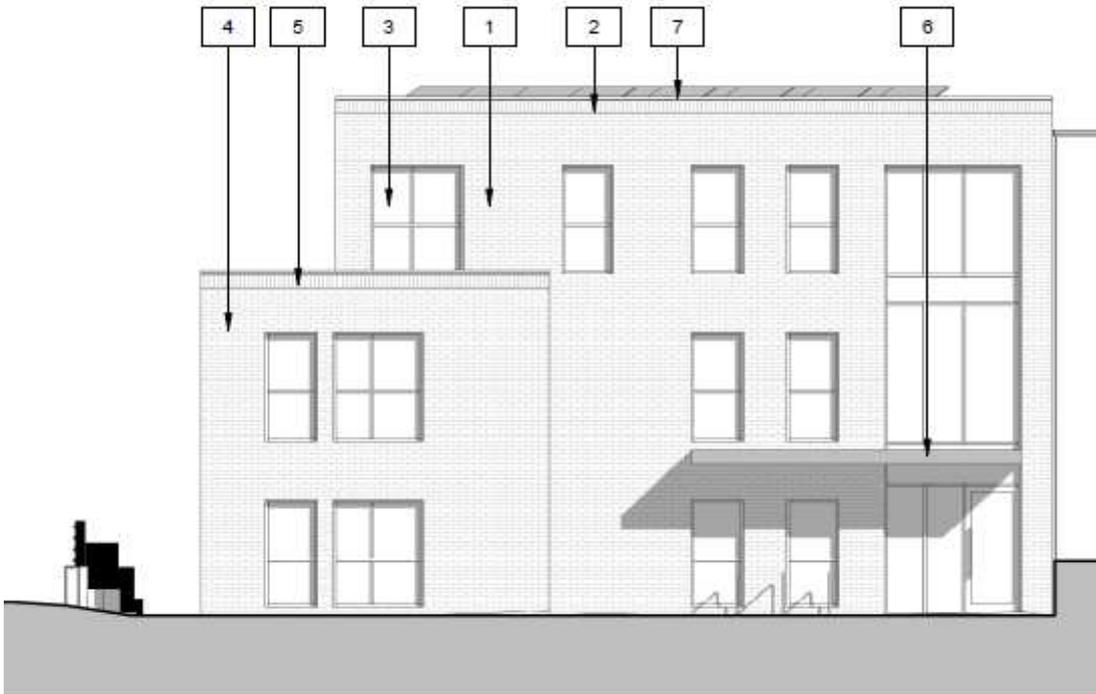


Figure 4 Proposed Front Elevation fronting Condover Crescent

### PROPOSED MATERIALS

1. Light colour brick
2. Light colour soldier course brick
3. Light brown colour window / door frames
4. Contrasting colour brick
5. Contrasting colour soldier course brick
6. Light brown metal canopy / railings
7. Precast stone capping
8. Windows on the permanent restricter with obscure glazing
9. Light brown metal pergola style canopy
10. Privacy screen with obscure glazing

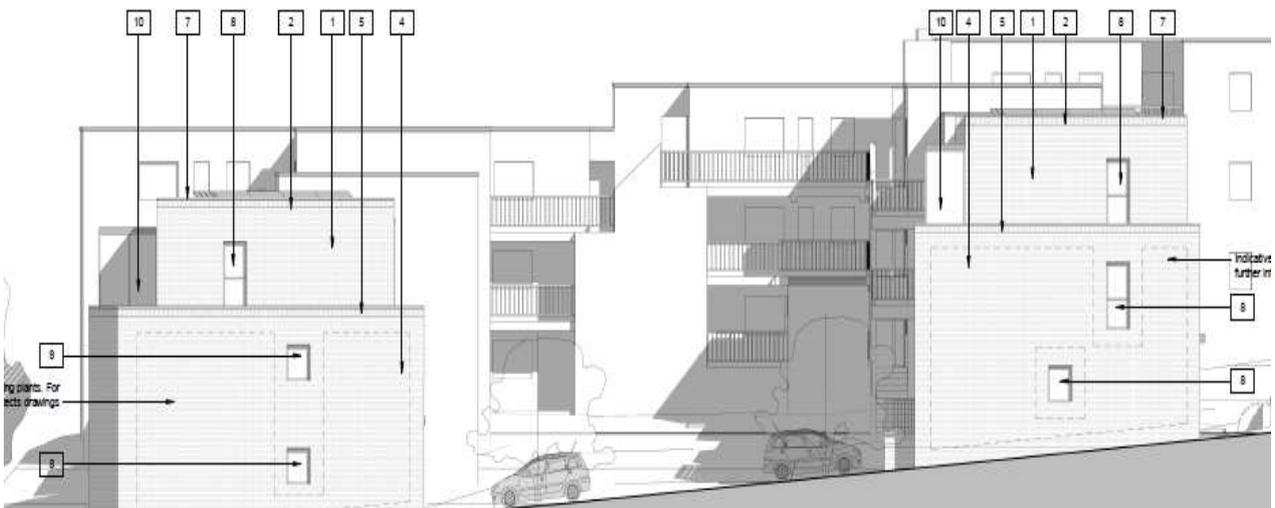


Figure 5 Proposed Flank Elevation addressing Moordown

- 11.5 This design would also have the impact of filling in the gap currently presented by the garage site and continuing the residential frontage which is welcomed. The step down in massing and use of brown brick also creates a complimentary form and appearance within the streetscene.
- 11.6 The layout is arranged with access for block A directly from Condover Crescent with a side path providing further access to a central parking area for 8 vehicles and residential access to block B. No objections are raised to this and this layout would maintain the current form proposed by the flats located at Condover Crescent.
- 11.7 The overall design which replicates the surrounding height, massing and layout, incorporates complimentary materials and roof form is therefore acceptable and the proposed development would be a considerable improvement to the existing streetscene. As such the proposal complies with relevant policies of the London Plan and Core Strategy.

## **12.0 Standard of accommodation**

- 12.1 Policy D6 of the London Plan (2021), Core Strategy Policy H5 (2014), The Mayor's Housing SPG (2016) and the Nationally Described Space Standard's (2015) requires housing developments to be of the highest quality internally and externally and either meet or exceed minimum space standards.
- 12.2 The proposed units would provide 50sqm and 71sqm of internal floor space. This would meet London Plan standards which stipulates a minimum of 50sqm and 70sqm for 1b2p and 2b4p units respectively.
- 12.3 All units would also be provided with a minimum of 5sqm of private amenity space in the form of a balcony which would meet London Plan Standards, would be double aspect and sensitively sited to afford future residents good levels of outlook and privacy to all habitable rooms.
- 12.4 A condition would be attached to the application in order to ensure that all units would comply with building regulations part M4(1) and M4(2) accessible and adaptable wheelchair standards.
- 12.5 The proposed development would meet internal and external standards which is welcomed and subject to a condition regarding accessibility, is acceptable with regards to the standard of accommodation.

## **13.0 Impact on neighbouring amenity**

- 13.1 Core Strategy (2014) Policies H5, DH(b) and Policies D3, D6, D14 and D14 of the London Plan (2021) states that it must be demonstrated that the proposed development 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 unneighbourly sense of enclosure, loss of privacy or overbearing impact
- 13.2 A number of objections have been received regarding the overbearing impact caused by the proposed development on the neighbouring properties to the south located on Moordown and drop in land levels.
- 13.3 The below figure shows that window to window separation distances would be 18m- 22m with approximately 6m from the rear garden boundaries to the south.
- 13.4 Whilst the proximity to the western garden boundaries and change in levels would cause some minor overbearing impacts, such relationships in urban areas are unavoidable and where proposed these impacts should be kept to a minimum and mitigation measures incorporated.
- 13.5 In this case, the proposed separation distances of 18- 22m, siting and modest 2 storey height to the south are considered sufficient to prevent significant overlooking, overbearing and sense of enclosure impacts.
- 13.6 Further amendments incorporated as part of the residents meeting held on the 14/04/2021 which include a planted trellis, use of obscure glazing and screening on the southern elevation would further mitigate these impacts.

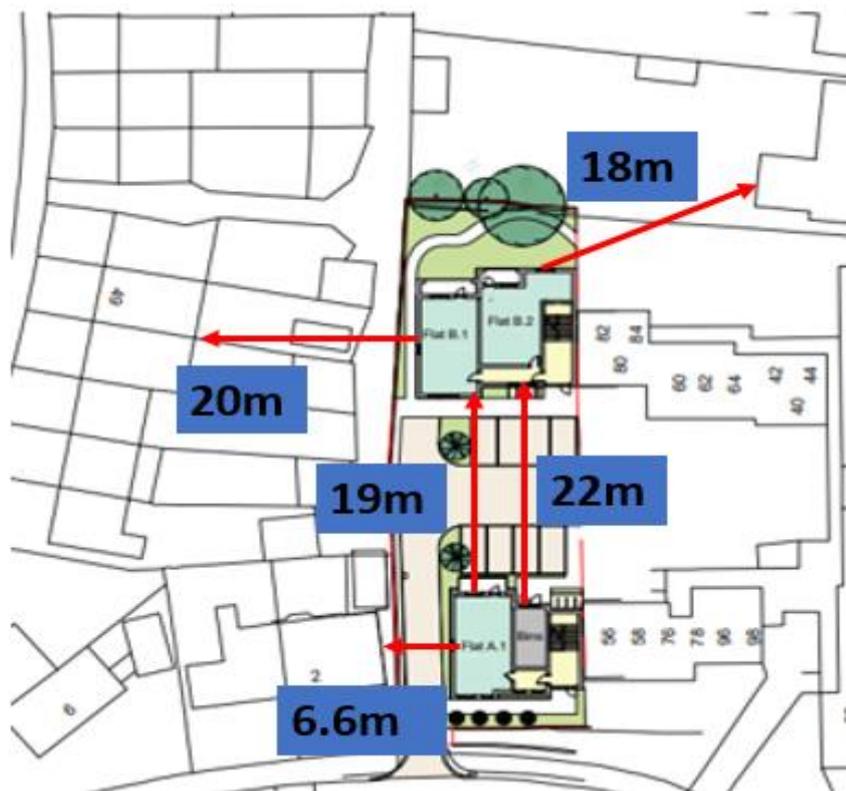


Figure 6 Proposed Separation Distances

13.7 There is a separation distance of 6.6m with 2 Condover Crescent however as the neighbouring windows are not habitable rooms this relationship is acceptable.

13.8 It is therefore acknowledged that the proposed development would cause some overbearing impacts to the properties on the south however these impacts would be mitigated by a number of measures which have been incorporated into the proposed development as a result of feedback from residents and during the design process.

13.9 The proposed development would therefore not cause an undue loss of privacy, sense of enclosure or overbearing impacts and is acceptable in this regard.

### *Daylight and Sunlight*

13.10 The below properties and amenity spaces at Moordown, Condover Crescent and Brent Road were tested with regards to daylight, sunlight and overshadowing to amenity spaces.



Figure 7 Properties Tested for DL/SL Impacts

1. 40 – 98 Brent Road
2. 1 Condover Crescent
3. 2 & 4 Condover Crescent
4. 6 Condover Crescent
5. 47 - 59 Moordown Street

13.11 For calculating daylight to neighbouring properties affected by a proposed development, the primary assessment is the vertical sky component (VSC) method of assessment together with the no sky line (NSL).

13.12 The VSC test measures the amount of sky that is visible to a specific point on the outside of a property, which is directly related to the amount of daylight that can be received. It is measured on the outside face of the external walls, usually at the centre point of a window. The test should be applied to the main window of each habitable room.

13.13 The NSL test calculates the distribution of daylight within rooms by determining the area of the room at desk/ work surface height (the 'working plane') which can and cannot receive a direct view of the sky and hence 'sky light'.

13.14 For the above methods, the guidance suggests that existing daylight and sunlight may be noticeably affected by new development if:

- Windows achieve a VSC below 27% and are reduced to less than 0.8 times their former value; and
- Levels of NSL within rooms are reduced to less than 0.8 times their former values.
- Sunlight refers to the amount of direct light received by the sun. In accordance with the BRE Guide, only windows belonging to main habitable rooms i.e. living rooms facing within 90 degrees of due south are assessed.
- The BRE establishes that the sunlight availability of the buildings may be adversely affected if the windows receive less than 25% of Annual Probable Sunlight Hours (APSH) or less than 5% Winter Probable Sunlight Hours (WPSH).

13.15 It is important to note that a flexible approach should be taken with regards to the BRE guidelines and the target values contained within are not mandatory. Different target values may be appropriate depending on the character of the site and the extent of the urban character.

13.16 The results for the adjacent properties have shown that, all windows have comfortably passed the required BRE criteria in all of their VSC, APSH, and WPSH values. As such the level of impact is seen to be minimal.

13.17 Regarding NSL values, all of the assessed rooms are found to comfortably pass the required BRE criteria except for only 2 rooms. The two impacted R29 and R30 are found to be located on the ground floor of the adjacent 40-98 Brent Road with an NSL change level slightly below the BRE criteria with around -9% (73%) and -7% (71%) respectively. Given that all other daylight and sunlight criteria for these units are met this minor transgression is acceptable and the impacts dwellings would still have good access to daylight and sunlight.

13.18 For open spaces BRE guidance recommends that at least 50% of the area of each amenity space should receive at least two hours of sunlight on 21 March. If existing garden or amenity area does not meet the above, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of light is likely to be noticeable.

13.19 The proposed development would have minimal impact on all adjacent amenity spaces and all spaces tested would receive sunlight across

50% of the garden areas for more than 2 hours on the 21st March, and as such is in compliance with BRE guidance.

13.20 In summary the separation distances, siting and massing of the proposed development would not cause any undue harm with regards to daylight, sunlight, privacy or sense of enclosure impacts and the overall impact on neighbouring amenity would be acceptable.

#### **14.0 Highways and servicing**

14.1 London Plan (2021) policies T5 and T6 set out vehicle and cycle parking's standards for residential dwellings. A maximum number of 6 spaces is recommended for the application site which has a PTAL rating of 1b together with 10 cycle parking spaces.

14.2 Policy SI7 of the London Plan (2021) states that developments should have adequate, flexible, and easily accessible storage space and collection systems.

14.3 Core Strategy policy IM(b) and (c) and policies T3 and T4 of The London Plan (2016) also seeks to prevent negative impacts upon the highways network.

14.4 8 off street parking spaces are proposed which exceeds the minimum standards however given that 4 parking spaces would be displaced and the low PTAL rating this is acceptable.

14.5 The site is currently occupied by 16 garages with 2 being used for vehicle storage and relocated in 2019. The submitted parking survey states there are between 14 and 17 unoccupied parking spaces within 200m of the site.

14.6 As the garages are currently not used for parking of vehicles, the number of cars displaced onto surrounding roads would be low and the parking survey shows that there is sufficient parking in the area to accommodate any informal daytime parking.

14.7 There is therefore sufficient capacity on the surrounding roads to accommodate the proposed parking needs and the impact of the proposal on parking in the area is acceptable. The proposed development is also not of a size which would cause undue stress on the road network.

14.8 Waste and servicing would occur to the front on Condover Crescent as existing or within the proposed car parking area which is acceptable.

Vehicle tracking also shows that fire and refuse vehicles would be able to enter and egress the site in forward gear.

- 14.9 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. An informative requiring reference to the Councils' Construction Site Noise Code of Practice would also be attached to the application.
- 14.10 The proposed highways, servicing and parking arrangements are therefore acceptable and accommodates the needs of existing and proposed residents without unduly impacting the surrounding road network or parking stress levels.

## **15.0 Biodiversity**

- 15.1 Policies G5, G6 and G7 of the London Plan (2021) and policy OS4 of the Core Strategy (2014) seek wherever possible to ensure that development makes a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 15.2 The site is considered to have limited biodiversity value due to the prevalence of hard landscaping and garages.
- 15.3 Details securing additional bird boxes, bat boxes, together with soft landscaping will be secured as part of a condition and would result in an enhancement in biodiversity to the site. This is acceptable and full details of biodiversity enhancements and landscaping are detailed in appendix 2.
- 15.4 Overall as the site has limited biodiversity value and provision would be made for bird boxes and additional soft landscaping, the proposed development would result in an enhancement in biodiversity to the site and is acceptable.

## **16.0 Environmental Health**

- 16.1 Policy E(e) of the Core Strategy and London Plan policies D13, D14 and S11 seek to manage potential impacts concerning contaminated land, air quality, and noise emissions.
- 16.2 Due to the sites historic use as a car park and garages there is potential for land contamination on site. A preliminary risk assessment has been

carried out which indicates an overall 'moderate/low' risk of contamination. Further exploratory works, subsequent risk assessment and a ground gas monitoring programme to confirm the low risk assessment is recommended.

- 16.3 Land contamination officers have reviewed the proposal and agree with the recommendations in the submitted risk assessment. Accordingly, further investigative works together with a risk assessment and verification report would be secured by condition to ensure ground conditions are safe and appropriate mitigation measures are taken in the event that contamination is present (refer to appendix 2).
- 16.4 The proposed development does not raise any further issues with regards to air quality or noise emissions.
- 16.5 The proposed development is located in a flood risk zone of 1. The submitted flood risk assessment states that the risk of flooding from tidal/ fluvial, surface water and ground water is low. Permeable paving is also proposed which would manage surface water run off rates. The proposed development is considered to be at low risk from flooding is acceptable with regards to flood risk.
- 16.6 Based upon the information submitted the proposed development is therefore acceptable with regards to Environmental Health.

## **17.0 Sustainability**

- 17.1 The NPPF and the London Plan (2021) Policy SI2 seeks an overall reduction in carbon dioxide emissions and Royal Greenwich Policy E1 state proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the energy hierarchy.
- 17.2 Details of the proposed energy measures have not been provided by the applicant. An energy statement is therefore proposed to be secured by condition detailing the reduction in carbon emissions, use of renewable energies and other energy demand reduction technologies utilised in accordance with the London Plan Energy Hierarchy. A minimum of 35% is required by policy however the applicant will be encouraged to meet carbon neutral.
- 17.3 Given that the proposal is for 8 units this approach is acceptable and full details are provided in appendix 2.
- 17.4 Subject to the above conditions the proposal is recommended for approval with regards to sustainability policies and is acceptable.

## **18.0 Community Infrastructure Levy (CIL)**

- 18.1 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policy T9. The Mayoral CIL formally came into effect on 1st April 2015, 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.
- 18.2 The current application is liable to this requirement however as the proposed development is for social housing would be liable for relief.

## **19.0 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 however as the proposed development is for social housing would be liable for relief.

## **20.0 Implications for Disadvantaged Groups**

- 20.1 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:
- 8 residential units to be let at social rent
  - High quality design resulting in improvement to the streetscene
  - Biodiversity enhancements

## **21.0 Conclusion**

- 21.1 The proposed development has been assessed in accordance with the development plan and all other relevant guidance and would have a high standard of residential accommodation which exceeds internal spaces standards.
- 21.2 The provision of affordable housing is also welcomed and the design would enhance the character of the area and provide a positive contribution to the streetscene.

### **Background Papers**

National Planning Policy Framework (2019)

Planning Practice Guidance  
The London Plan (2021)  
Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted  
July 2014)

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