

<b>LOCAL PLANNING COMMITTEE</b> <b>25 March 2025</b>	<b>Agenda Item: 6</b> <b>Reference No: 24/3752/F</b> <b>Web Link: <a href="#">Planning Documents</a></b>
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**Applicant:** M Hamburger

**Agent:** A Friedrich

<b>Site Address:</b> 47 Speranza Street, Plumstead, London, SE18 INX	<b>Ward:</b> Plumstead Common <b>Application Type:</b> Full Planning Permission
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## **I. Recommendation**

- I.1 That Full Planning Permission be granted for change of use from existing dwellinghouse (Use Class C3) to a 5-bed, 5-person HMO (Use Class C4), in addition to construction of single-storey rear extension, loft conversion and rear dormer and all other associated alterations.
- I.2 subject to The conditions (Appendix 2) to be detailed in the notice of determination.
- I.3 To authorise the Assistant Director (Planning & Building Control) to Make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2), its addendums and the minutes of this Area Committee Meeting, where the Assistant Director (Planning & Building Control) considers it appropriate, before issuing the decision notice.

## **2. Summary**

- 2.1 Detailed below is a summary of the application:

<b>The Site</b>	
Site Area (m <sup>2</sup> )	0.0092
Local Plan Allocation	None
Heritage Assets	None
Tree Preservation Order	None
Flood Risk Zone	I (No Flood Risk Assessment Required)
Controlled Parking Zone (CPZ)	No

<b>Existing and Proposed Building</b>	
Building Height	8.43 metres
No. of storeys	2
Ground area coverage (m <sup>2</sup> )	52.76

<b>Transportation</b>		
Car Parking	No. existing car parking spaces	0
Car Parking	No. Proposed Car Parking Spaces	0
Cycle Parking	No. Proposed Cycle Parking	5
Public Transport	PTAL Rating	3

<b>Public Consultation</b>	
Number of neighbours in Support	0
Number of objections – addressed in section 6 of this report.	28 objections (These are addressed in section 6 of the report).

- 2.2 The application has been brought before committee because the application has received twenty-eight objections from local residents.
- 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 that set out in section 1 above.

## Site Plan



### 3. Site and Surroundings

- 3.1 The application site is 47 Speranza Street, Plumstead, London, SE18 1NZ.
- 3.2 The site is located on the eastern side of Speranza Street and contains an existing two-storey terraced dwelling, with a small front garden and a rear yard.

- 3.3 The surrounding area is predominantly residential in character and comprises a mixture of terraced dwellings, blocks of flats and some semi-detached dwellings.
- 3.4 The application site is not located within a Conservation Area and does not relate to a listed building. No relevant Article 4 Directions are applicable to the site.
- 3.5 The application site has a PTAL rating of 3 (where 0 is the worst and 6b is the best).
- 3.6 The site is within Flood Zone 1.

#### 4. **Relevant Planning History**

<i>App Number:</i>	24/3752/F	<i>Decision:</i>	Approved	<i>Decision Date:</i>	16/01/2024
<i>Address:</i>	47 SPERANZA STREET, PLUMSTEAD, LONDON, SE18 1NX				
<i>Description:</i>	Certificate of Lawfulness (Proposed) is sought for construction of a roof extension to create a loft, including a rear dormer window and two roof lights to the front roof slope. All proposed materials to match the existing roof.				

#### 5. **Proposal (in detail)**

- 5.1 Planning permission is sought for change of use from existing dwellinghouse (Use Class C3) to a 5-bed, 5-person HMO (Use Class C4), in addition to construction of single-storey rear extension, loft conversion and rear dormer and all other associated alterations
- 5.1 The proposed single storey rear extension would be 3.5m in depth, 4.845m in width and 3m in eaves height featuring a flat roof. The overall development to the rear of the site would result in a full-width extension. This would serve part of room 2 and kitchen/dining area.
- 5.2 The proposed rear dormer would have a depth of 3.43m, height of 1.9m and width of 4.0m. This would serve room five.

- 5.3 In terms of materials, the application form states that these will match the existing dwelling.
- 5.4 The proposed HMO would provide two bedrooms at ground floor level in addition to the kitchen/dining which would be located to the rear of the property. Both bedrooms on the ground floor would have an ensuite bathroom.
- 5.5 The first floor would feature two one person bedrooms, each with their own ensuite bathroom.
- 5.6 The third floor would feature a one person bedroom contained within the dormer and would benefit from an en-suite.
- 5.7 The drawings indicate that five bins would be located to the front of the property and a cycle store would be located within the rear garden.

**6. Consultation**

- 6.1 The application, since being submitted in November 2024 has been subject to full public consultation comprising of a site notice (dated 5<sup>th</sup> December 2024) and six neighbour notification letters sent to adjacent occupiers on the 28 November 2024.
- 6.2 Twenty-eight (28) objections have been received in relation to the proposed development, some from the same address. A summary of the neighbour objections is provided below:

<b>Summary of Comments</b>	<b>Officers comments</b>
Existing parking pressure is experienced from Plumstead Police Station and Plumstead Centre.	Highways and parking are discussed in section 16 and 17 of this report.
Proposed housing estate currently being built on Speranza Street is going to cause further parking problems.	Each application is determined on its own merits, and the proposed housing estate along Speranza is not relevant to the application submitted.  Highways and parking issues are discussed in section 16 of this report.

Increase in parking pressure from proposed development.	Highways and parking are discussed in section 16 of this report.
Poorly maintained HMOs can contribute towards visual blight, attracting antisocial behaviour reducing the overall quality of the neighbourhood. Anti-social behaviour.	Potential behaviour of future occupants is not a planning consideration.  There is no evidence that the proposal would lead to an unacceptable increase in anti-social behaviour.
Erosion of community.	This is not material planning consideration.
Disruption of community cohesion from short-term occupants.	This is not material planning consideration.
Change of use will pressurise a Victorian style house with existing structural issues.	This is not material planning consideration.
Small kitchen facilities would force the tenants to rely on takeaway meals, reducing the quality of life and increasing the household waste and risk of rodent issues.	The quality of accommodation is assessed in section 15 of this report. Waste issues are discussed within section 18 of this report.
Fire doors lead to noise pollution.	Fire doors are not considered to result in a material increase in noise pollution. Impact on amenity is assessed within section 14 of this report.
Proposed plans show 4 washer dryers on one wall and on the other side is No.49s living space. More than one washer-dryer would create noise.	The placement of kitchen appliances are not considered to result in a material increase in noise pollution. Notwithstanding this, the layout is only indicative and will be further agreed with licencing.  Impact on amenity is assessed within section 14 of this report.
Safety and security from HMOS.	There is no evidence that there are any issues with regard to safety and security from HMOs.

No management plan has been submitted with the application.	Given the scale of development proposed, this is not considered necessary.
Increase in fire risk given the types of occupants that can be expected in such dwellings.	There is no evidence that the proposed development would result in an increase in fire risk.
Lack of communal spaces in HMOs.	There is no requirement for a separate living space in HMO's.  The quality of Living Environment for Future Residents is discussed in section 15 of the report.
Loss of light, sense of enclosure and overshadowing from adjoining properties for both neighbours.	Amenity effects on surrounding properties is discussed in section 14 of this report.
Disturbance from people coming and going.	Amenity effects on surrounding properties is discussed in section 14 of this report.
Narrow street and lack of greenery to absorb noise pollution.	Amenity effects on surrounding properties is discussed in section 14 of this report. It is not considered necessary that greenery be introduced into the proposal to mitigate noise pollution.
Lack of soundproofing in HMOs.	Amenity effects on surrounding properties is discussed in section 14 of this report.
Quality of accommodation.	The quality of accommodation is assessed in section 15 of this report.
Lack of bathrooms will lead to poor ventilation compromising hygiene and air quality.	The quality of accommodation is assessed in section 15 of this report. No issues around air quality have been identified.
Lack of windows in the bathroom leads to a lack of fresh air.	The quality of accommodation is assessed in section 15 of this report. There is no requirement for a window to be provided for a bedroom and there are other means of ventilation available.
Decline in standard and appearance of street.	Design considerations are assessed within section 13 of the report.

<p>The loft extension is built to the existing ridge height of the existing roof. This is contrary to both Permitted Development Guidance and Greenwich Council's Supplementary Design Guidance as it does not allow the original ridge height to be maintained once a new ridge tile is added. There is typically a 0.2m set back here.</p>	<p>For a dormer roof extension to fall within permitted development, it must not project above the highest point of the roof. There is no requirement for it to be set down from the ridge by 0.2m.</p> <p>As set out elsewhere within this report, the site has a relevant fallback position, in the same design which was approved under permitted development 24/2233/CP.</p>
<p>A potential of 15 people could be occupying the home.</p>	<p>In the event of an approval a condition will be included limiting the number of occupants in the dwelling.</p>
<p>Conversion of dwelling into an HMO should not be allowed in today's society.</p>	<p>There are no policies within the Royal Greenwich Core Strategy limiting the number of HMOs.</p>
<p>The proposal is in a residential area which does not justify the conversion of a family home.</p>	<p>There are no policies within the Royal Greenwich Core Strategy limiting the number of HMOs.</p>
<p>Contradiction of regeneration goals.</p>	<p>The conversion of the existing dwellinghouse into an HMO would bring wider benefits to the community.</p> <p>The principal of the proposed HMO is discussed within section 12 of this report.</p>

## 7. **Councillors**

6.3 Three ward councillors were consulted on 27th November 2024. No responses were received.

## 6. **Responses from Council Departments**

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



<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officers comments</b>
<b>Transport and Highways:</b>	<p>While there are six bus routes within walking distance of the site it is not within an easy walking distance to a railway station.</p> <p>It is therefore considered to have moderate access to public transport with a PTAL of 3. Given the sites remoteness from such provision, this can promote use of personal mobility such as a car.</p> <p>As no car parking provision is proposed or possible, any parking demand will rely on kerb side availability.</p> <p>As the majority of housing locally is terraced with little opportunity for off street parking there is heavy demand for parking on street where roads in the vicinity are largely unrestricted. If additional parking cannot be accommodated, this can lead to obstructive parking occurring at corners or across drives etc.</p> <p>Inconsiderate parking could adversely affect existing local residents and potentially also lead to issues affecting refuse or emergency vehicle access.</p>	<p>Matters relating to transport and highways are discussed elsewhere in section 16 and 17 of this report.</p>

	<p>The London Plan requires a full assessment of a proposals impact on the transport network; requiring that development does not have an adversely impact. Policy IM(b) of the Core Strategy. Policy T1 of the London Plan (2021) promotes a strategic approach to transport to support the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport and create a shift from car use to more space-efficient travel. Policy T2 Healthy Streets also recognises that Development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.</p> <p>Policy IM(b) of the Core Strategy also sets out the consideration for walking and cycling in new development.</p> <p>It is therefore recommended that a parking survey is undertaken overnight to ascertain the level of stress in the locality. The survey should be carried out using the methodology used by LB Lambeth although the car</p>	
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	<p>spaces should be considered to be 5.5m long not 5m as suggested. While the shorter length may be appropriate for a more Central London Borough, (where more city type cars would be prevalent), this borough uses 5.5m as a more representative figure and to allow manoeuvring.</p> <p>Adequate cycle parking is to be provided in the rear garden.</p> <p>Waste Services should be consulted regarding residential refuse and storage</p>	
<b>Waste Services:</b>	<p>Thank you for the planning memo: 24/3752/F. We have looked over this application and are satisfied with the proposal.</p>	<p>The implications for waste are discussed elsewhere in section 18 of this report.</p>

## 7. Residential Amenity Groups

6.5 Positive Plumstead Project and Friends of Plumstead Common were consulted on the 27 November 2024. No responses were received.

## 8. Planning Context

6.6 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 – 2024)**
- **National Planning Practice Guidance (NPPG)**
- **The London Plan (March 2021)**
- **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” – 2014)**

- **New Developments: Guidance Notes for the storage and collection of waste and recycling materials for the Royal Borough of Greenwich (May 2018)**
- **The Royal Borough of Greenwich Standards for Houses in Multiple Occupation (2019)**
- **Royal Borough of Greenwich Urban Design SPD (2023)**

6.7 For full details relevant policies, SPDs and other documents, refer to Appendix 3.

## **9. Material Planning Considerations**

6.8 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: 24/3752/F):

- Principle of Development (Section 12)
- Design (Section 13)
- Impact on Neighbouring Amenity (Section 14)
- Quality of Living Environment for Future Residents (Section 15)
- Transport and Highways Impacts (Section 16)
- Cycle Parking (Section 17)
- Waste and Refuse Storage (Section 18)
- Biodiversity Net Gain (BNG) (Section 19)
- Community Infrastructure Levy (CIL) (Section 20)
- RBG CIL (Section 21)
- Public Sector Equality Deputy (PSED) and Human Rights (Section 20)
- Implications for disadvantaged groups (Section 23);
- Conclusion (Section 24)

## **10. Principle of Development**

6.9 The overriding objective of the Royal Greenwich policy framework is to deliver high quality development which improves the quality and distinctive identity of places and contributes to their success and the area's popularity as somewhere to live, work and stay.

6.10 Policy H9 of the London Plan (2021) (LP) sets out that boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic housing needs. Policy H9 clearly states that where HMO's are of a reasonable standard they should generally be protected.

- 6.11 Policy H2 of the Core Strategy (2014) (CS) promotes a mix of housing types and sizes, varying according to the location of the development and the character of the surrounding area. Other relevant considerations include; the level of accessibility to public transport, schemes for special needs groups, or where there is a poor external environment.
- 6.12 It is important to note that the Council's CS does not include any policies which protect the loss of family sized accommodation in relation to the conversion of single family dwellinghouses into HMO accommodation. As such, the loss of the existing accommodation in order to convert the property is considered acceptable.
- 6.13 In respect of the suitability of the proposed HMO, the Council's Urban Design SPD (adopted October 2023) states:
- “It is important that the Royal Borough supports a range of homes in terms of size and tenure in order to meet a variety of housing need. HMOs that are of a good standard form an important part of the provision of lower cost housing. However, the unmanaged conversion of family housing stock to HMOs can undermine the Royal Borough's objective to meet these varying needs and make it difficult to achieve mixed and balanced communities as set out in the Core Strategy.”*
- 6.14 It is therefore evident that HMOs have been identified as providing suitable residential accommodation, which will be supported by the Council subject to other material considerations including the quality of the internal living environment. There are no applicable policies relating to the overconcentration of HMO's within a specific area.
- 6.15 On the basis of the above, the proposal is considered acceptable in principle, subject to the other material planning considerations such as the provision of an acceptable quality of accommodation for its occupants. This is discussed elsewhere within this report.

## **11. Design**

- 6.16 The National Planning Policy Framework (NPPF) (2024) states that the creation of a high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Chapter 12 – para 131). Paragraph 135 states further that planning decision should ensure that developments are:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

6.17 Paragraph 139 goes on to state that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

6.18 Development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

6.19 Outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

6.20 Policy D3 of the LP states that development proposals should be of high quality, enhancing local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation,

scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.

- 6.21 Policy DHI of the CS requires all developments to be of a high quality of design and demonstrate that they positively contribute to the improvement of both the built and natural environments. As such, developments should seek to complement the architecture of surrounding buildings, the established layout and character of the area and the appearance of the street scene through design solutions which respect the scale, height, bulk and massing of the existing built form in the area, whilst seeking to use appropriate materials and external finishes.

Rear dormer

- 6.22 Council's Urban Design Guide SPD (2023) provides guidance around roof/loft extensions. Paragraph i.66 states that dormers at the rear are generally acceptable, subject to the building typology. They should be well spaced and positioned within the existing roof slope and should reflect the position of the existing windows below. A general guideline is for dormer windows to be set 0.5m below the roof ridge, set 0.5m in from part walls on either side, and set 0.5m above the roof eaves.
- 6.23 Principle I.3.I sets out that roof/loft conversions will only be accepted where adequate headroom is achieved without raising the height of the ridge of the roof. 2.1m head height across an area of min. 11.5 sq/m for double bedrooms and 7.5 sq/m for single bedrooms is generally acceptable for loft conversions where the width of the highest portion of the room is min. 2.15m.
- 6.24 Figure i.34 states that full width, box-type dormer extensions will be discouraged on any roof face as they do not integrate well with pitched roof houses.
- 6.25 A dormer window is proposed on the rear elevation of the dwelling with materials to match the existing dwelling. The proposed windows will be of similar appearance to the existing dwelling. It is noted the proposed dormer would be contradictory to the above guidance, occupying almost the entirety of the rear roof being a box-type dormer. However, whilst this would be typically considered to have an unacceptable effect on the character of the host-building and surrounding environment due to its excessive bulk and domineering design, in this instance, the applicant has a relevant fallback

position, in the same design which was approved under permitted development 24/2233/CP.

- 6.26 The fallback position could currently be built and change the character of the property and surrounding area
- 6.27 Accordingly, there is reasonable grounds to assume that the development could be implemented and therefore the proposal is acceptable, despite its departure from guidance and Policy of the CS.
- 6.28 Overall, and with respect to the above assessment, the proposed development is considered to be acceptable in design terms and would be in accordance with the NPPF (2024), Policy D3 of the London Plan (2021), Policies DH1 and DH(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and the RBG Urban Design Guide (2023).

Single storey rear extension

- 6.29 Principle I.3.3 of the RBG Urban Design Guidance SPD (2023) relates to rear extensions and sets out that all rear extensions are required to respond appropriately to the scale of the existing building and the size of the garden. This principle also sets out that a 3.6m projection from the rear is typically considered appropriate in Royal Greenwich.
- 6.30 With regard to roof forms for single storey rear extensions, section i.91 of the RBG Urban Design Guidance SPD (2023) sets out that a flat roof form is generally preferred as it helps to reduce the overall bulk and impact of the extension. The SPD does go on to state at section i.92 that other roof forms can be considered, in particular where they are a response to site specific constraints or the character of the house or wider locality.
- 6.31 Section i.91 of the RBG Urban Design Guidance SPD (2023) states that “Careful consideration needs to be given to the relationship with the first floor window sill. Generally, the roof line of the extension should be 300mm below the 1st floor window sill [...]”
- 6.32 The proposed rear extension would measure approximately 3.5m in depth, 4.845m in width and 3m in height featuring a flat roof. The overall development to the rear of the site would result in a full-width extension.



- 6.33 With regards to the above guidance, it is considered that the proposed extension, by reason of overall size, scale and height would remain subservient to the host dwelling and would respect its character.
- 6.34 Overall, and with respect to the above assessment, the proposed development is considered to be acceptable in design terms and would be in accordance with the NPPF (2024), Policy D3 of the London Plan (2021), Policies DHI and DH(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and the RBG Urban Design Guide (2023).

## **12. Impact on neighbouring amenity**

- 6.35 Policy DI4 of the LP sets out that development proposals should seek to proactively manage noise impacts in a variety of ways where possible. Proposals should use good design to mitigate and minimise existing and potential nuisances generated by uses and activities located in the area.
- 6.36 Policy E(a) of the CS states that planning permission will not normally be granted where a proposed development or change of use would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and Soil pollutants or grit.
- 6.37 Policy DH(b) of the CS requires new development 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, by creating an unneighbourly sense of enclosure, or by unacceptably impacting the wind environment or microclimate.
- 6.38 Further, Council's Urban Design Guide SPD (2023) provides guidelines in considering the impact of development on neighbouring amenity. Notably, Principle I.2.1 and its associated paragraphs (i.13, i.15, i.18) emphasize that extensions must not adversely affect neighbours' living conditions. This includes considerations of daylight, sunlight, overshadowing, and privacy. The guidelines stress the importance of window placement, orientation, and distance, as well as the overall impact on neighbouring properties. Extensions that significantly overshadow adjacent spaces, create a sense of enclosure, dominate views, or appear overbearing are likely to be rejected.

Number 45 Speranza Street

- 6.39 Number 45 is a two-storey terraced dwelling, located to the north of the application site. This property sits at a lower land level than the application site.
- 6.40 The proposed rear dormer, by reasoning of its positioning and scale, is not considered to have an unacceptable impact on daylight and sunlight or outlook. In relation to privacy, as openings would be located on a façade where an outlook already exists, this is also considered acceptable. Additionally, as outlined above, there is a relevant fall-back position in that the same design can be undertaken under permitted development, as authorised by the Lawful Development Certificate 24/2233/CP.
- 6.41 The proposed single storey rear extension would measure approximately 3.5m in depth and 3m along the shared boundary with number 45. Despite sitting at a lower land level than the application site, given the restricted depth at only 3.5m, it is still considered that the proposed rear extension, would not result in an unacceptable amenity impact on the above property in terms of loss of daylight and sunlight, loss of outlook, privacy or an increased sense of enclosure. Whilst some degree of overshadowing of the garden would occur, this would be minor and given the substantial size of the garden, it is considered that there would be sufficient amenity space remaining for no.45.
- 6.42 A condition would be recommended on any approval to ensure the flat roof could not be used for an area of external amenity space.

Number 49 Speranza Street

- 6.43 Number 49 is a two-storey terraced dwelling, located to the south of the application site. This property sits at a higher land level than the application site.
- 6.44 The proposed rear dormer, by reasoning of its positioning and scale, is not considered to have an unacceptable impact on daylight and sunlight or outlook. In relation to privacy, as openings would be located on a façade where an outlook already exists, this is also considered acceptable. Additionally, as outlined above, there is relevant fall-back position in that the same design can be undertaken under permitted development, as authorised by the Lawful Development Certificate 24/2233/CP.

6.45 The proposed single storey rear extension would measure approximately 3.5m in depth and 3m along the shared boundary with number 49. Given the depth of the proposed rear extension, the proposed development would not result in an unacceptable amenity impact on the above property in terms of loss of daylight and sunlight, loss of outlook, privacy or an increased sense of enclosure. A condition would be recommended on any approval to ensure the flat roof could not be used for an area of external amenity space.

#### 5 Saunders Road

6.46 Number 5 Saunders Road is positioned rear of the application site.

6.47 Given the proximity to this property from the proposed development, the proposal would have an acceptable impact on the amenity of this property in terms of loss of daylight/sunlight and loss of outlook. For the same reasoning, the proposal would be acceptable in terms of loss of privacy.

#### Noise

6.48 It is acknowledged that the submission brings forward an increase in the proposed number of occupants at the application property. With reference to this, an increase to the number of persons residing in the dwelling to an absolute maximum of five is not considered to present a significantly detrimental impact on the amenity enjoyed by the nearby neighbouring properties beyond the existing use of the property as a single family dwellinghouse (Use Class C3) with 2 bedrooms. It is also noted that the Certificate of Lawfulness for the property (24/2233/CP) would allow for a further bedroom to be located within the newly created roof space.

6.49 In summary, the proposed additional occupants would still preserve the amenity of the neighbouring occupiers, in accordance with Policy D14 of the London Plan (2021) and Policies E(a) and DH(b) of the adopted Core Strategy and Detailed Policies (2014).

#### Summary

6.50 In summary, the proposed change of use and proposed extensions would preserve the amenity of the neighbouring occupiers, in accordance with Policy D14 of the London Plan (2021) and Policies E(a) and DH(b) of the adopted Core Strategy and Detailed Policies (2014).

## 15. Quality of Living Environment for Future Residents

- 6.51 The Royal Borough of Greenwich Residential Extensions, Basements, and Conversions Guidance SPD (2019) was superseded on the 25th October 2023, by the Urban Design SPD (2023).
- 6.52 The Urban Design SPD (Adopted October 2023) includes at Chapter I, section I.3.9 guidance for Houses in Multiple Occupation (HMOs). Paragraph i.I66 states:
- “The quality of accommodation provided by HMOs can be poor and can give rise to concern. To be considered good quality, proposals for the conversion to an HMO will need to:*
- *provide sufficient internal space*
  - *provide occupants with a reasonable standard of amenity*
  - *not give rise to significant adverse amenity impacts to the surrounding properties/residential neighbourhood”*
- 6.53 The Royal Borough’s Standards for HMOs were adopted in 2019. These set out detailed amenity standards as well as additional further requirement relating to the management of the HMO.
- 6.54 In Table I it sets out the minimum internal space standards. However, further standards depending on the kitchen and lounge /dining facilities are identified in the HMOs Standards (2019).
- 6.55 Policy H5 of the CS seeks that new residential development, redevelopment, refurbishment or conversions will be expected to achieve a high quality of housing design and an integrated environment.
- 6.56 This is supported by LP Policy D6 which states that housing developments should be of high-quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. The policy goes on to state that the design of development should maximise the provision of dual aspect dwellings and provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context.
- 6.57 The applicant has made is clear that the five rooms are for single occupancy only and the below assessment is based for the maximum occupancy of five persons.

### Bedroom Sizes

- 6.58 Bedroom sizes are assessed against Table I of the Royal Greenwich HMO Standards (2019) – “minimum room sizes, where kitchen facilities are in a separate room” within the Royal Borough of Greenwich Standards for HMOs.

<b>Bedrooms</b>				
Bedroom	Occupancy	Size (sqm)	Standard (sqm)	Complies
1	1 person	10.50	9	Yes
2	1 person	10.29	9	Yes
3	1 person	11.18	9	Yes
4	1 person	10.35	9	Yes
5	1 person	12.23	9	Yes

- 6.59 As it can be seen from the table, the development would comply with the maximum standards provided by the HMO licensing standards. The HMO would have a maximum capacity of 5 persons.

- 6.60 Overall, it is considered that the bedroom sizes provided would be acceptable and comply with the above referenced standards.

### Kitchen facilities

- 6.61 The Standards for Houses in Multiple Occupation (2019) states:

*“Where exclusive kitchen facilities cannot be provided, one set of kitchen facilities shall be provided for every 5 occupants. The kitchen size and layout must enable the practical, safe & hygienic use of the kitchen for storage, preparation and cooking of food.”*

- 6.62 A five-person HMO would require one set of kitchen facilities with a minimum floor space of 9.5sqm. The floorplans indicate a kitchen providing a space of 12.17 sqm and as a result the proposal would provide a kitchen of a scale that would be in accordance with the RBG Standards for Houses in Multiple Occupation (2019).

### Bathroom Provision

- 6.63 The RBG Standard for Houses in Multiple Occupation (2019) provide guidance as to the required bathroom provision for HMO’s:

- 6.64 “Where exclusive bathroom/shower room and toilet facilities cannot be provided, [...] for 5 persons, one bathroom or shower rooms, and one toilet with a wash hand basin. One of the required WC’s and wash hand basins shall be provided in a room separate to the bath/shower room”.
- 6.65 Each bedroom is provided with its own en-suite. This is considered in compliance with the above guidance.

#### Floor to Ceiling Heights

- 6.66 The RBG HMO Standards (2019) state that it is expected that all rooms will have a minimum ceiling height of 2.1m over at least half the floor area.
- 6.67 The development would be acceptable in this regard.

#### Outdoor Amenity Space

- 6.68 The HMO standards (2019) do not set out required provisions for outdoor space. It is noted however that the application site has an existing rear garden space which would be retained.
- 6.69 The application site has an existing rear garden space which would be retained.
- 6.70 The development would be acceptable in this regard.

#### Other internal amenity factors

- 6.71 Given the positioning of neighbouring habitable opening and amenity spaces, none of the proposed bedrooms brought forward in this application would be subject to any significant privacy or overlooking related impacts from neighbouring properties.
- 6.72 All the proposed habitable spaces are expected to receive an acceptable level of daylight/ sunlight and have access to a reasonable outlook should the proposed development go ahead.

#### Conclusion

- 6.73 The development provides an acceptable quality of accommodation for prospective residents. As such, the development would be in accordance with

Policy D6 of the London Plan (2021) and Policies DHI and H5 of the Royal Greenwich Local Plan (2014), the Royal Borough of Greenwich Standards for Houses in Multiple Occupation (2019) and the Royal Borough of Greenwich Urban Design Guide SPD (October 2023).

## **7 . Transport and highways**

- 7.1 Policy T2 of the LP states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. This policy also states that development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving.
- 7.2 Policy T6 of the LP states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking.
- 7.3 Policy T4 of the LP sets out that developments should not increase road danger.
- 7.4 Policy IM4 of the CS supports the development of an integrated and sustainable transport system that is extensive in coverage and meets the needs of residents, businesses, workers and visitors in Royal Greenwich. It requires all development in Royal Greenwich to contribute to improved accessibility and safety and to reduce the use of the private car and the need to travel.
- 7.5 The application site has a PTAL rating of 3, which indicates a good level of public transport connectivity.
- 7.6 The proposed development brings forward plans which would be car free. This is in accordance with the requirements of the LP. As such, this provision is acceptable in this instance. Given the existing dwelling is a family house with no restriction on the number of occupants, it is not considered that the proposal would lead to any unacceptable car parking stress along Speranza Street.
- 7.7 Objections have raised concerns regarding traffic and parking. The Council's Highways Officer has been consulted on the matter and has stated that given the site remoteness, this could promote use of personal mobility such as a

car which would need to be met by kerbside availability within the surrounding streets.

- 7.8 The Highways Officer has therefore recommended that a car parking survey be undertaken to ascertain as to whether there is sufficient capacity for car parking in the local parking network to meet additional demand.
- 7.9 It was confirmed by the agent a Highways Survey would not be submitted. Whilst there would be an increased occupation of the site, the social profile of those living in HMO's trends away from privacy car ownership with those in rented accommodation such as this having up to having up to 0.6 fewer cars than owner-occupied dwellings. It is therefore considered that a five (5) person HMO would not give rise to significant car ownership over and above the existing situation.
- 7.10 It is also noted that as the property could lawfully be converted into a 3 bedroom unit should Certificate of Lawfulness ref. 24/2233/CP be implemented. This could easily allow for a 5 person occupancy in the similar capacity to the proposed development. In this regard, the uplift in residents is considered minimal and would unlikely represent a substantial increase in the reliance on private vehicles over and above the existing situation.
- 7.11 Further to this, the application site is still considered to be located within an area which benefits from multiple forms of public transport. For example, Plumstead Station is positioned 0.96km from the application site. There are also multiple bus routes along Plumstead High Street which includes bus 99, 96, 180, 422 and 469 which provides frequent services into Woolwich and connections to the rest of London. Therefore, given the various forms of transport in close proximity to the application site and noting the moderate PTAL rating, this will discourage the use of cars. In addition, cycle parking is proposed and discussed below in section 17 to avoid reliance on private vehicles and encourage use of public transport.
- 7.12 As such, whilst the comments from the Council's Highways officer are noted, it is not considered that the proposed development would cause excessive strain on the local parking network over and above the existing situation and as a result a car parking survey is considered onerous in this instance.
- 7.13 With reference to the increase in the number of occupants beyond that of the existing lawful C3 use on site, it is considered that the proposed



development would not result in any significantly detrimental traffic impacts or other impacts on the road network.

- 7.14 Overall, the proposal is therefore not considered to result in a significant impact on the road and pedestrian network and is therefore consistent with Policies T2, T4, T6 and T6.1 of the London Plan (2021) and Policies IM4, IM(a), IM(b) and IM(c) of the Core Strategy (2014).

## **17. Cycle and storage**

- 17.1 Policy T5 of the LP states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. The policy is clear that proposals should do this by meeting providing cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3. The cycle parking should be fit for purpose, secure and well-located.
- 17.2 The LP prescribes that the proposed development should bring forward 2 cycle parking spaces at minimum in line with Table 10.2. This is supported by Policy IM(b) of the Core Strategy.
- 17.3 Cycle parking for five cycles is proposed within the rear garden within a secure and dry cycle storage facility. The siting of this would be acceptable however details would be sought via condition should this application be recommended for approval.

## **18 Waste and recycling storage**

- 18.1 Policy H5 of the CS 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 LP Policies SI7 and SI8.
- 18.2 For a proposal such as this, the Council's Waste Services typically require 5x240L bins are required for an HMO of this size(2 for general waste, 2 for mixed dry recycling and 1 for organic waste).
- 18.3 The plans indicate that 5x240L bins will be provided within the front garden. This location is considered suitable for prospective occupiers as well as waste

collection crews and would be in line with the existing situation at the site whereby bins are stored loosely within the front garden.

18.4 The Council's Waste Services have raised no objection to the proposal.

18.5 The proposed development would comply with LP policies S17 and S18 and Policy H5 of the CS.

## **19. Biodiversity Net Gain (BNG)**

19.1 Biodiversity Net Gain (BNG) Biodiversity Net Gain (BNG) came into force on the 2nd April 2024 and is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

19.2 It is noted that the applicant has stated within the application form that the proposal would be exempt from providing BNG due to being under the de minimis threshold.

19.3 The proposed development does not impact a priority habitat and impacts less than 25 square metres of on-site habitat and 5 metres of on-site linear habitats such as hedgerows. It is considered the development falls within the applicable list of exemptions and does not need to comply with the BNG requirements.

## **20. Community Infrastructure Levy**

20.1 The current application is not liable to this requirement.

## **21. RBG CIL**

21.1 The current application is not liable to this requirement.

## **22. Public Sector Equality Deputy (PSED) and Human Rights**

22.1 Under the Equalities Act 2010, the Council must have due regard to the need to eliminate discrimination, harassment or victimisation of persons by reason of age, disability, pregnancy, race, religion, sex and sexual orientation. This planning application has been processed and assessed with due regard to the PSED. The application proposals are not considered to conflict with the Duty.

22.2 The application has also been considered in the light of the Human Rights Act 1998 and it is considered that the analysis of the issues in this case, as set out in this report and recommendation, is compatible with the Act.

### **23. Implications for disadvantaged groups**

23.1 There are no specific implications identified. Applications for HMO's are not required to be compliant with the accessible design requirements as set out in Policy D5 of the London Plan (2021).

### **24. Conclusion**

24.1 The proposed development would provide an HMO which would contribute to meeting the local and strategic housing needs of the Borough and London as a whole.

24.2 The proposed change of use and associated external works would not result in a significantly detrimental effect on the character and appearance of the application building or the wider public realm.

24.3 The proposed development would provide an acceptable quality of accommodation for residents.

24.4 The proposed development would not result in any unacceptable impacts to the amenity enjoyed by neighbouring occupiers.

24.5 Accordingly, it is recommended that permission be granted for application reference 27/3752/F, in line with Section I of this report.

### **Background Papers:**

National Planning Policy Framework (NPPF – 2024)

National Planning Practice Guidance (NPPG)

The London Plan (March 2021)

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

New Developments: Guidance Notes for the storage and collection of waste and recycling materials for the Royal Borough of Greenwich (May 2018)

The Royal Borough of Greenwich Standards for Houses in Multiple Occupation (2019)

Royal Borough of Greenwich Urban Design Guide SPD (2023)

Responses from consultations

Report Author: Saira Alam - Planning Officer  
Tel No: 020 8921 5913  
Email: [Saira.Alam@royalgreenwich.gov.uk](mailto:Saira.Alam@royalgreenwich.gov.uk) \_\_

Reporting to: Victoria Geoghegan, Assistant Director, Planning &  
Building Control  
Email: [victoria.geoghegan@royalgreenwich.gov.uk](mailto:victoria.geoghegan@royalgreenwich.gov.uk)  
Telephone: 0208 921 4303