

Local Planning Committee 22 October 2024	Agenda Item: 5 Reference No: 24/2093/F Web Link: Planning Documents
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Applicant: Mr Held
Agent: SAM Planning services

Site Address: 24 Lucknow Street, Plumstead, London, SE18 2SN	Ward: Plumstead Common Application Type: Full Planning Permission
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I. Recommendation

- I.1 That Full Planning Permission be **GRANTED** for the change of use of single family dwellinghouse (Use Class C3) to five-bedroom small HMO with a maximum capacity of six persons (Use Class C4) and construction of two single-storey rear extensions, cycle and refuse storage and associated external alterations (amended description).
- 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:
- i. Make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2), 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:

The Site	
Site Area (m ²)	0.0094
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

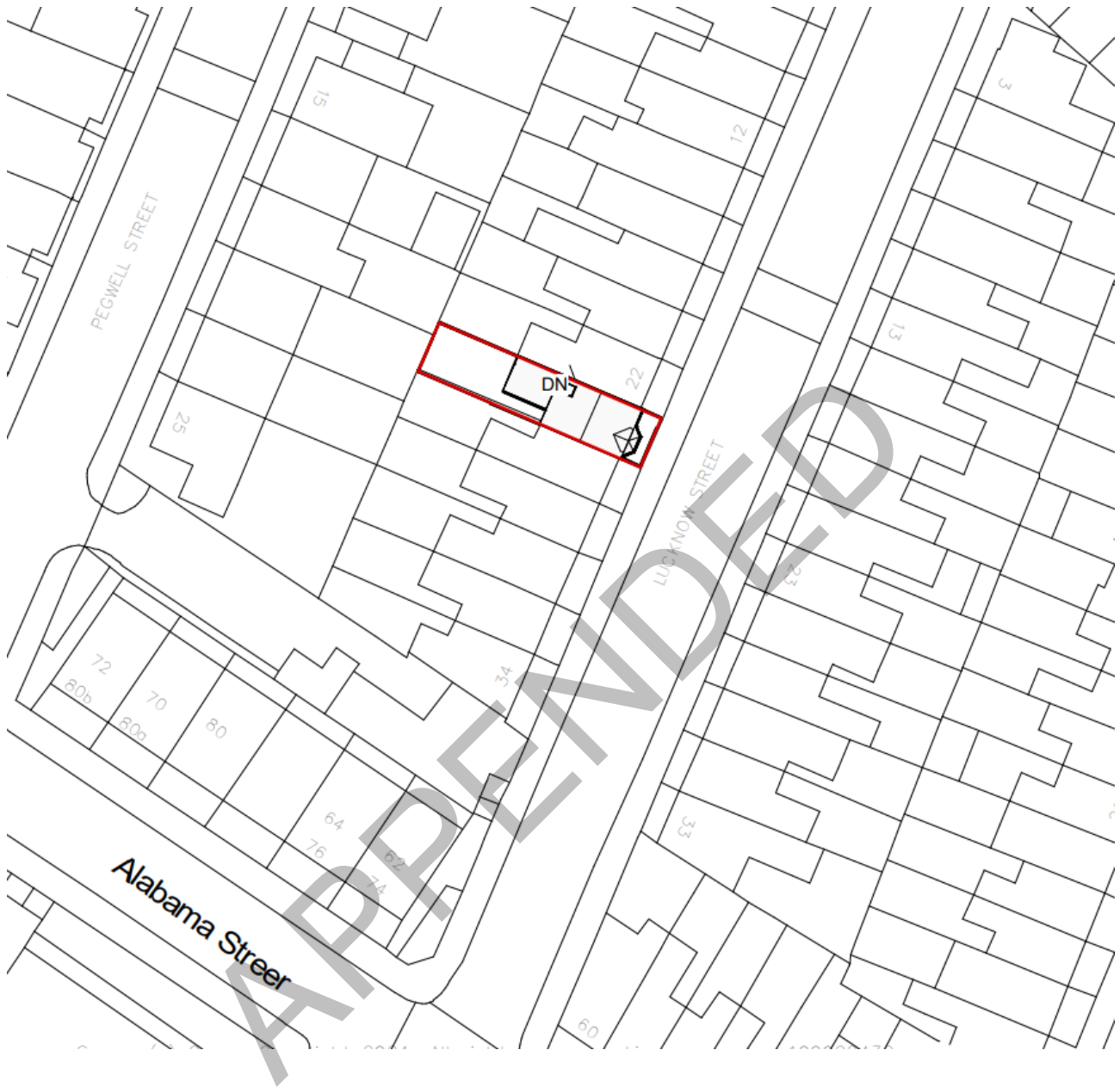
Existing and Proposed Building	
Building Height	8.61 metres
No. of storeys	2
Ground area coverage (m ²)	63.39

Transportation		
Car Parking	No. existing car parking spaces	0
Car Parking	No. Proposed Car Parking Spaces	0
Cycle Parking	No. Proposed Cycle Parking	2
Public Transport	PTAL Rating	2

Public Consultation	
Number of neighbours in Support	0
Number of objections – addressed in section 6 of this report.	24 objections, some from the same address

- 2.2 The application has received twenty-four 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 24 Lucknow Street, London SE18 2SN.
- 3.2 The site is located on the northwestern side of Lucknow Street and contains an existing two-storey terraced dwelling, with a small front garden and a rear yard.
- 3.3 The property benefits from an original two-storey rear projection.

- 3.4 The surrounding area is predominantly residential in character and comprises a mixture of terraced dwellings, blocks of flats and some semi-detached dwellings.
- 3.5 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.
- 3.6 The application site has a PTAL rating of 2 (where 0 is the worst and 6b is the best).
- 3.7 The site is within Flood Zone 1.

4. Relevant Planning History

- 4.1 There is no relevant planning history for the site.

5. Proposals (in detail)

- 5.1 Planning permission is sought for a change of use of single family dwellinghouse (Use Class C3) to five-bedroom small HMO with a maximum capacity of six persons (Use Class C4) and construction of two single-storey rear extensions, cycle and refuse storage and associated external alterations.
- 5.2 The proposed single storey rear extension that would be attached to the existing two-storey rear outrigger along the northern portion of the site would measure 3m in depth, a width of 3.18m and a height of 3m (3.17 to the top of the parapet).
- 5.3 The second single-storey rear extension would infill the southern portion of the property and would be 3m in depth, with a width of 1.28m and also a height of 3m to the top of the roof (3.17 to the top of the parapet).
- 5.4 Materials proposed for both rear extensions would match the original property.
- 5.5 The proposed HMO would provide two bedrooms at ground floor level in addition to the kitchen which would be located to the rear of the property. Both bedrooms on the ground floor would have an ensuite bathroom.
- 5.6 The first floor would feature three 1 person bedrooms, each with their own ensuite bathroom.

5.7 The drawings indicate that three 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 June 2024 has been subject to full public consultation comprising of a site notice and seven neighbour notification letters sent to adjacent occupiers.

6.2 During the assessment process, it was noted that the proposal sought only 5 bedrooms rather than the 6 as originally included within the description of development. As such, an agreement was reached with the applicant to revise the description of development. Given the minor changes to the description and that no revisions to the plans were made, it was not considered necessary to re-consult.

6.3 Twenty-four (24) objections have been received in relation to the proposed development, some from the same address. A summary of the neighbour objections is provided below:

Summary of Comments	Officers comments
Overcrowding and high population density	<i>The proposed bedrooms meet the minimum area requirements under the Council's HMO standards.</i>
Parking problems and traffic congestions.	<i>Highways and traffic matters are discussed in the relevant section of this report.</i>
Waste management and litter issues.	<i>Waste matters are discussed in the relevant section of this report.</i>
Noise pollution and disturbances.	<i>Noise and amenity matters are discussed in the relevant section of this report.</i>
Anti-social behaviour and potential increase in crime.	<i>Potential behaviour of future occupants is not a planning consideration.</i>
Negative impact on community cohesion and character, loss of family housing in the area.	<i>There are no policies within the Royal Greenwich Core Strategy that allow for the consideration of the loss of family homes. Whether or not future occupants would participate in the local community is not a planning consideration.</i>

Inadequate living conditions for tenants (small room sizes, lack of communal spaces).	<i>There is no requirement for a separate living space in HMO's. Each bedroom meets the minimum area requirements for when a kitchen is provided in a separate room and no separate dining/living space is provided.</i>
Strain on local services and infrastructure.	<i>The proposal is not considered to result in an unacceptable strain on local services or infrastructure.</i>
Concerns about property values.	<i>This is not a planning consideration.</i>
Issues with property management and landlord responsibility.	<i>This is not a planning consideration.</i>
Fire safety concerns, especially regarding narrow staircases and corridors. Drainage and ventilation issues.	<i>This is not a planning consideration and would need to be addressed by Building Control, if necessary.</i>
Privacy and overlooking concerns for neighbouring properties. Loss of Daylight/Sunlight.	<i>Amenity effects on surrounding properties is discussed in the relevant section of this report</i>
Lack of public notification and consultation about the planning application	<i>Consultation was undertaken in accordance with legislative requirements. Photo evidence of the site notice erected outside the application site was supplied by the agent.</i>
Over concentration of HMOs	<i>This is assessed within the principal of development section of this report.</i>
No measurements given on the plans	<i>The drawings include a scale bar which allows the accurate measurement of the plans. This is considered to be sufficient.</i>
Suitability of Cycle Parking	<i>This is assessed within the Cycle Parking section of this report.</i>
Loss of family sized accommodation	<i>This is assessed within the principal of development section of this report.</i>

Inappropriate setting near primary schools	<i>The proposed use is not considered inappropriate or unacceptable due to its proximity to any nearby schools.</i>
Party Wall Issues	<i>This is not a material planning consideration.</i>
Development just to make profit for the landlord.	<i>This is not a material planning consideration.</i>
Construction Timeline and Budget	<i>Whilst this is a section included within the application form, this is not a material planning considerations.</i>
Heating Emissions	<i>The Council takes the information provided on the application form on face value in that there will be no Nox emissions. Notwithstanding this, this is not a material planning consideration for an application type as this.</i>
Water Usage	<i>This is not a material planning consideration</i>
Lack of Mechanical Ventilation in bathrooms	<i>It is not considered that any mechanical ventilation is necessary for the bathrooms proposed.</i>
Locating a fridge in the bedrooms is not appropriate.	<i>Including a fridge within the bedrooms is not a material planning consideration and cannot be controlled through planning legislation.</i>
Noise disturbance during construction works.	<i>This is only considered to be for a temporary period. As such, the application cannot be reasonably refused for this reason.</i>

6.4 **Councillors**

6.5 Three ward councillors were consulted on 23rd July 2024. No responses were received.

6.6 **Responses from Council Departments**

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

Details of Representation	Summary of Comments	Officers comments
<p><i>Transport and Highways:</i></p>	<p>There are three bus routes within walking distance of the site which is not within an easy walking distance to a railway station, it is therefore considered to have poor access to public transport with a PTAL of 2. Given the sites remoteness from such provision, this can promote use of personal mobility such as a car. As no car parking provision is proposed, 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. Inconsiderate parking could adversely affect existing local residents and potentially also lead to issues affecting refuse or emergency vehicle access.</p>	<p>Whilst the comments from Highways are noted, the application property would still be in use for residential purposes. Under the LP, the parking provision for a new residential property in an area with a PTAL of 2 is a maximum of 0.25 spaces per dwelling. There are no specific standards in relation to HMO accommodation. It is noted that the existing on-street parking in the area is undesignated with no restrictions in place.</p> <p>Whilst the application site does have a low PTAL, it is located 1 mile away from Welling Train Station (as the crow flies) and 0.8 miles away from Plumstead Railway Station. Further to this, there are 3 bus routes within walking distance from the application site. These include the 291 (providing connections between Queen Elizabeth Hospital in Woolwich and Plumstead Common) and the 51 (providing connections between Orpington and</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</p>	<p>Woolwich). These bus routes provide regular services throughout the day.</p> <p>In addition, the application proposes the provision of cycle parking storage within the rear garden which would encourage sustainable transport opportunities and this is welcomed.</p> <p>This is further discussed within the Transportation and Highways section of this report.</p>
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	<p>methodology used by LB Lambeth although the car 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>Although no cycle parking standard is indicated in the London Plan specifically for this type of use, it is confirmed that adequate cycle provision should be made. In order to promote active travel for all occupiers it is recommended that one secure and easily accessible space be provided per bedroom. Transport for London provides Cycle Design standards indicating the design of cycle parking including the width of stores to ensure that they are functional and easy to use.</p> <p>While it is stated in the Planning statement that “The proposal has made provision for 6 cycle parking spaces to the rear</p>	
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	of the building”, insufficient detail is indicated of the type and security. Waste Services should be consulted regarding residential refuse and storage.	
Waste Services:	We are satisfied with the proposal.	The implications for waste are discussed elsewhere in this report.

6.8 Residential Amenity Groups

6.9 Positive Plumstead Project and Friends of Plumstead Common were consulted on the 23rd July 2024. No responses were received.

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 – 2023)**
- **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)**

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

8. Material Planning Considerations

8.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application (Ref: 24/2093/F):

- Principle of Development (Section 9);
- Design (Section 10);
- Impact on Neighbouring Amenity (Section 11);
- Quality of Living Environment for Future Residents (Section 12);
- Transport and Highways Impacts (Section 13);
- Cycle Parking (Section 14);
- Waste and Refuse Storage (Section 15)
- Biodiversity Net Gain (BNG) (Section 16)
- Community Infrastructure Levy (CIL) (Section 17);
- RBG CIL (Section 18);
- Implications for disadvantaged groups (Section 19); and
- Public Sector Equality Deputy (PSED) and Human Rights (Section 20)

9. Principle of Development

9.1 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.

9.2 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.

9.3 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.

9.4 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.

9.5 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.”

9.6 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.

9.7 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.

10. Design

10.1 The National Planning Policy Framework (NPPF) (2023) 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.

10.2 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:

- 1. 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
- 2. 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.

10.3 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.

10.4 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.

10.5 Council's Urban Design Guide SPD (2023) also provides relevant guidance for the design of rear extensions. Principle 1.3.3 of the SPD 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.

- 10.6 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. Further, the roof line of the extension should generally be 300mm below the 1st floor window sill, although it is recognised that this cannot always be achieved.
- 10.7 The proposed development would introduce two single-storey rear extensions that would protrude 3m from the original rear walls of the existing dwelling.
- 10.8 Generally, both extensions are of a bulk and height that would be subordinate to the existing host-building and would both feature a flat roof that will assist in reducing the profile.
- 10.9 It is acknowledged that the proposal would result in a reduction in the existing outdoor space that the application site currently benefits from. However, it is considered that the scale is still appropriate relative to the garden space, with an area that is approximately 4.29m x 4.47m at the rear remaining.
- 10.10 Being at the rear of the property, the proposed extensions would not be visible from the wider public view and therefore would not cause harm to the character of the streetscape.
- 10.11 It is noted that the rear extension to be attached to the existing two-storey outrigger would not achieve the 300mm gap from the window on the first floor of that extension, however the shortfall is insignificant and will be indiscernible within the wider context of the built form.
- 10.12 The application form states that 'London Stock Yellow brick' will be utilised for materials, with the submitted drawings showing similar materials to the existing dwelling. Should the application be recommended for approval, a condition would be imposed requiring the materials used to match that which is shown in the submission documents.

10.13 On the basis of the above, the development would be acceptable in design terms and would comply with Chapter 12 of the NPPF (2023), Policy D3 of the London Plan (2021), Policies DH1 and DH(a) of the Core Strategy (2014) and the Royal Borough of Greenwich Urban Design Guide (SPD) (2023).

11. Impact on neighbouring amenity

- 11.1 Policy D14 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.
- 11.2 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.
- 11.3 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.
- 11.4 Further, Council's Urban Design Guide SPD (2023) provides guidelines in considering the impact of development on neighbouring amenity. Notably, Principle 1.2.1 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.

22 Lucknow Street

- 11.5 This property is located immediately adjacent to the subject site on its northern boundary and contains an existing two-storey terraced dwelling attached to the application building. This property also has a rear garden.

- 11.6 The proposed development would introduce two single-storey rear extensions, with the extension in the northern portion of the site having the most potential to result in amenity effects.
- 11.7 Despite this, both extensions would only protrude 3m from the existing rear walls of the dwelling and would be 3m in height (except for slightly raised parapet wall). Accordingly, the overall bulk and scale of the extensions are in accordance with the Urban Design Guidance and are not considered to result in an unacceptable reduction in daylight/sunlight or outlook for occupants at this property. The proposed extensions would not introduce any windows that would face directly towards this property, avoiding any overlooking or privacy effects.
- 11.8 For the reasons outlined above, the proposal is not considered to result in any unacceptable amenity effects on this property.

26 Lucknow Street

- 11.9 This property is located immediately adjacent to the subject site on its southern boundary and also contains an existing two-storey terraced dwelling attached to the application building. This property also has a rear garden and sits at a higher land level.
- 11.10 The proposed development would introduce two single-storey rear extensions, with the extension in the southern portion of the site having the most potential to result in amenity effects. Both extensions would protrude 3m from the existing rear walls of the dwelling and would be 3m in height (except for slightly raised parapet walls).
- 11.11 Accordingly, the overall bulk and scale of the extensions are in accordance with the Urban Design Guidance and are not considered to result in an unacceptable reduction in daylight/sunlight or outlook for occupants at this property. Any potential impact on no.26 Lucknow Street would also be further reduced due to this property sitting at a higher land level than the application site.
- 11.12 For the reasons outlined above, the proposal is not considered to result in any unacceptable amenity effects on this property.

19 & 21 Pegwell Street

- 11.13 These properties are located immediately adjacent to the subject site on its western boundary and both contain existing two-storey terraced dwellings with rear gardens that back onto the application site.
- 11.14 Given the proximity of these properties to the proposed development, the development will have an acceptable impact on the amenity of these properties in terms of loss of daylight/sunlight and loss of outlook.
- 11.15 Whilst the extensions will have windows that face towards these properties, r due to the separation distance from the dwellings at these properties and height of the extensions, they are not considered to result in an unacceptable reduction of privacy for the occupants at these properties.
- 11.16 For the reasons outlined above, the proposal is not considered to result in any unacceptable amenity effects on these properties.

Noise

- 11.17 The proposal would result in an increase in the number of occupants by converting the existing three-bedroom single dwelling house into a five-bedroom, six-person HMO. Given that a three-bedroom dwelling could reasonably be expected to accommodate up to four-persons, it is not considered that the addition of two occupants would result in a marked increase in noise and disturbance over and above the existing situation.

Wider Properties

- 11.18 With regard to properties in the wider surrounds, the same assessments made above also apply, except that the greater intervening distance between the application site and these properties further mitigates any effects to a level that is also acceptable.

Summary

- 11.19 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).

12. Quality of Living Environment for Future Residents

- 12.1 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).
- 12.2 The Urban Design SPD (Adopted October 2023) includes at Chapter I, section I.3.9 guidance for Houses in Multiple Occupation (HMOs). Paragraph i.166 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”*

- 12.3 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.
- 12.4 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).
- 12.5 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.
- 12.6 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.
- 12.7 The applicant has made clear that four of the five rooms would be for single occupancy only and the below assessment is based on the absolute maximum capacity of six persons.

Bedroom Sizes:

12.8 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.

Bedrooms				
Bedroom no.	Occupancy	Size (sqm)	Standard (sqm)	Complies
Bedroom No.1 (ground floor front)	2 persons	13.84m ²	12m ²	Yes
Bedroom No.2 (ground floor rear)	1 person	14m ²	9m ²	Yes
Bedroom No.3 (first floor front)	1 person	10m ²	9m ²	Yes
Bedroom No.4 (first floor, middle)	1 person	9.55m ²	9m ²	Yes
Bedroom No.5 (first floor, back	1 person	9.61m ²	9m ²	Yes

12.9 As can be seen from the above table, the development would comply with the minimum standards provided by the HMO licencing standards. The HMO would have a maximum capacity of six persons, with bedroom 1 providing a double bedroom.

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

Kitchen Facilities:

12.11 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.”

12.12 As a kitchen serving 6 persons, two sets of kitchen facilities need to be provided within the proposed kitchen area. The minimum requirement for a kitchen serving 6 people, according to the Council’s HMO standards (2019) is 10.5m².

12.13 Based on the Council's measurements, the proposal consists of a kitchen which would measure 10.84m² which is in accordance with the minimum requirement.

12.14 Although it isn't clear whether two sets of kitchen facilities are proposed, given the size of the kitchen it is considered that there is sufficient space for this and can be addressed via the HMO licencing process if necessary. As such, in this regard the development would provide an acceptable quality of accommodation. The development is consistent to the requirements of The Standards for Houses in Multiple Occupation (2019).

Bathroom Facilities:

12.15 The RBG Standard for Houses in Multiple Occupation (2019) provide guidance as to the required bathroom provision for HMO's.

"Where exclusive bathroom/shower room and toilet facilities cannot be provided, [...] for 6-10 persons, two bathrooms or shower rooms, and two toilets with a wash hand basin should be provided. One of the required WC's and wash hand basins shall be provided in a room separate to the bath/shower room".

12.16 Each bedroom is provided with its own ensuite. This is considered in compliance with the above guidance.

Floor to Ceiling Heights:

12.17 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.

12.18 The development would be acceptable in this regard.

Outdoor Amenity Space:

12.19 The HMO standards (2019) do not set out required provisions for outdoor space. It is noted however that the proposed development would reuse the existing rear garden space at the application site. As such, and with reference to the size of the proposed rear garden, this aspect of the proposal is considered to be acceptable in this instance.

Other Internal Amenity Factors:

- 12.20 The proposed HMO as a whole would be dual aspect. Given the positioning of neighbouring habitable openings 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.
- 12.21 It is considered that all of the proposed habitable spaces are expected to largely receive an acceptable level of daylight/ sunlight and have access to a reasonable outlook should the proposed development go ahead. This is acceptable in this regard.

Conclusion:

- 12.22 The proposed development would provide an acceptable quality of accommodation for prospective residents. As such, the proposed development is in accordance with Policy D6 of the London Plan (2021) and Policies DH1 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 SPD (2023).

13. Transport and Highways Impacts

- 13.1 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.
- 13.2 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.
- 13.3 Policy T4 of the LP sets out that developments should not increase road danger.
- 13.4 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.

- 13.5 The application site has a PTAL rating of 2 (where 0 is the worst and 6b is the best). Policy T6.1 of the LP sets out that the maximum provision for new residential development should be in accordance with Table 10.3, which in this instance equates to 0.25 spaces per dwelling.
- 13.6 Whilst it is noted that the proposal would not include any off-street parking provision, Lucknow Street is not located within a Controlled Parking Zone (CPZ). Therefore, there are no restrictions that apply to on-street parking. Furthermore, policies and guidance do not stipulate any specific parking standards for HMO accommodation.
- 13.7 Whilst the application site does have a low PTAL, it is located 1 mile away from Welling Train Station (as the crow flies) and 0.8 miles away from Plumstead Railway Station (as the crow flies). Further to this, there are 3 bus routes within walking distance from the application site. These include the 291 (providing connections between Queen Elizabeth Hospital in Woolwich and Plumstead Common), the 51 (providing connections between Orpington and Woolwich) and the . These bus routes provide regular services throughout the day and the 625 (providing connections between Plumstead Common and Chislehurst).
- 13.8 As such, despite having a low PTAL rating, the site is still easily accessible by public transport, which will discourage the use of cars. As such, it is not considered that a Parking Stress Survey is needed, and it is considered that the development would not result in undue parking pressure. The development is therefore acceptable in this regard.
- 13.9 As such, the proposed development is considered to be in accordance with Policies T4, T6, T6.4 and D3 of the London Plan (2021) and Policies IM4 and IM(c) and DHI of the Core Strategy (2014).

14. Cycle Parking

- 14.1 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.

- 14.2 This is supported by Policy IM(b) of the CS.
- 14.3 A cycle store has been shown within the rear garden, the siting of this would be acceptable however details would be sought via condition should this application be recommended for approval.
- 14.4 The proposal complies with Policy T5 of the LP and IM(b) of the of the Core Strategy (2014).

15. Waste and Refuse Storage

- 15.1 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 S17 and S18.
- 15.2 Three bins have been shown in the front garden of the application site. For a proposal such as this, the Council's Waste Service typically require 5x240L bins (2 for general waste, 2 for mixed dry recycling and 1 for organic waste. Officers consider that the front garden would be large enough to accommodate this waste provision, should this application be recommended for approval, this bin provision would be secured via condition. Further, Council's Waste Services have raised no objection to the proposal.
- 15.3 The proposed development would comply with LP policies S17 and S18 and Policy H5 of the CS.

16. Biodiversity Net Gain (BNG)

- 16.1 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.
- 16.2 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.

16.3 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.

17. Community Infrastructure Levy

17.1 The current application is not liable to this requirement.

18. RBG CIL

18.1 The current application is not liable to this requirement.

19. Public Sector Equality Deputy (PSED) and Human Rights

19.1 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.

19.2 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.

20. Implications for disadvantaged groups

20.1 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).

21. Conclusions

21.1 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.

21.2 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.

- 21.3 The proposed development would provide an acceptable quality of accommodation for residents.
- 21.4 The proposed development would not result in any unacceptable impacts to the amenity enjoyed by neighbouring occupiers.
- 21.5 Accordingly, it is recommended that permission be granted for application reference 24/2093/F, in line with Section I of this report.

Background Papers:

National Planning Policy Framework (NPPF – 2023)
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

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Appendix I – Drawing Numbers (Ref: 24/2093/F)

The below lists all of the drawings taken into consideration in this assessment:

EX-L001 Rev A, EX-P001 Rev A, EX-P002 Rev A, EX-P004 Rev A, EX-E001 Rev A, EX-E002 Rev A, EX-S001 Rev A, EX-PR001 Rev A, PR-L001 Rev A, PR-P001 Rev A, PR-P002 Rev A, PR-P004 Rev A, PR-E001 Rev A, PR-E002, PR-S001, PR-K002 Rev A, PR-PR001 Rev A and Planning Statement dated 5th July 2024.

APPENDED

Appendix 2 – Conditions and Informatives

I. Conditions and Reasons for Application Reference 24/2093/F:

1. The development to which this permission relates must be begun not later than the expiration of three (3) years beginning with the date on which the permission is granted.

Reason 1: As required by Section 91 of the Town and Country Planning Act 1990.

2. The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

EX-L001 Rev A, EX-P001 Rev A, EX-P002 Rev A, EX-P004 Rev A, EX-E001 Rev A, EX-E002 Rev A, EX-S001 Rev A, EX-PR001 Rev A, PR-L001 Rev A, PR-P001 Rev A, PR-P002 Rev A, PR-P004 Rev A, PR-E001 Rev A, PR-E002, PR-S001, PR-K002 Rev A, PR-PR001 Rev A and Planning Statement dated 5th July 2024.

Reason 2: In the interests of good planning and to ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

3. The materials to be used for the external surfaces of the extension hereby permitted shall match those used on the existing dwelling. All new works and works of making good to the retained fabric shall be finished to match the adjacent work unless otherwise stated on the approved drawings and retained for the lifetime of the development.

Reason 3: To ensure that the high design quality demonstrated in the plans and submission is delivered so that the local planning authority may be satisfied as to the external appearance of the building(s) and to comply with Policy D3 of the London Plan (March 2021), Policies DH1 and DH(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014) and the Council's Urban Design Guide SPD (2023).

4. Prior to the occupation of the development hereby approved, details of secure and dry cycle storage facilities shall be submitted to and approved in writing by the LPA.

The storage and recycling facilities shall in all respects be constructed in accordance with the approved details prior to the occupation of the development and maintained thereafter.

Reason 4: To promote sustainable travel and to ensure compliance with Policy T6 of the London Plan (2021) and IM4, IM(b) and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014).

5. The HMO (C4) hereby approved shall provide accommodation for a maximum capacity of 6 persons. Further planning permission would be required to increase this capacity.

Reason 5: In order to ensure that an appropriate quality of accommodation is provided and to safeguard the amenity of neighbouring properties, in accordance with Policy D6 and D14 of the London Plan (2021), Policies DH1, H5, E(a) and DH(b) of the Royal Greenwich Local Plan (2014) and the Royal Borough of Greenwich Standards for Houses in Multiple Occupation (2019).

6. Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no extensions or alterations to the building(s) hereby approved shall be carried out without the prior written permission of the local planning authority.

Reason 6: In order that, in view of the nature of the development hereby permitted, the local planning authority may have the opportunity of assessing the impact of any further development and to comply with Policy D3 of the London Plan (2021), Policies DH1, H5 and DH(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

7. Prior to the occupation of the development hereby approved, and notwithstanding those submissions hereby approved, full details of refuse storage units so as to store five (5) x 240 L refuse and recycling bins shall be provided to, and approved in writing by, the Local Planning authority. Details should include location, plan and elevation drawings of the storage, as well as the proposed materiality of the bin storage units.

The storage and recycling facilities shall in all respects be constructed prior to the occupation of the development hereby approved and in accordance with the approval details and maintained for the lifetime of the development.

Reason 7: In order that the Council may be satisfied with the details of the proposal and to ensure compliance with Policies D3 and S18 of the London Plan (2021) and Policies H5 and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Adopted July 2014).

8. Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), the use of the flat roofed extension hereby approved shall be as set out in the application and no development for the formation of any door providing access to the roof shall be carried out, nor shall the roof area be used as a balcony, roof garden or similar amenity area.

Reason 8: In order to prevent any unacceptable loss of privacy to adjoining properties and the area generally and to comply with Policy DH(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and the Council's Urban Design SPD (2023).

2. Informative(s) for Application Reference 24/2093F:

01. The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, no pre-application advice was sought. However, as the proposal was clearly in accordance with the Development Plan, permission could be granted without any further discussion.
02. The premises should be registered with Royal Borough of Greenwich Council as a House in Multiple Occupation (HMO).

Appendix 3 – National, regional and local planning policies and Supplementary Planning Guidance / Documents.

1. National Planning Policy Framework (NPPF – 2023)

- Chapter 5 – Delivering a Sufficient Supply of Homes
- Chapter 9 – Promoting Sustainable Transport
- Chapter 12 – Achieving well-designed places

2. The London Plan (March 2021) – The following policies are of consideration:

Good Growth Policies

G4 – Delivering the homes Londoner’s need

Design Policies

Policy D3 – Optimising site capacity through the design led approach

Policy D5 – Inclusive Design

Policy D6 – Housing Quality and Standards

Policy D14 – Noise

Housing Policies

Policy H8 - Loss of existing housing and estate redevelopment

Policy H9 - Ensuring the best use of stock

Sustainable Infrastructure Policies

Policy S17 - Reducing waste and supporting the circular economy

Policy S18 – Waste Capacity and Net Waste Self Sufficiency

Transport Policies

Policy T2 – Healthy Streets

Policy T4 – Assessing and Mitigating Transport Impacts

Policy T5 - Cycling

Policy T6 - Car Parking

Policy T6.1 – Residential Parking

3. The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” – 2014) – The main Core Strategy policies relevant to this application are:

Housing Policies

H1	New Housing
H2	Housing Mix
H5	Housing Design
H(a)	Protection of Existing Housing

Design and Heritage Policies

DH1	Design
DH(a)	Residential Extensions
DH(b)	Protection of Amenity for Adjacent Occupiers

Environment and Climate Change Policies

E(a)	Pollution
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Infrastructure and Movement Policies

IM4	Sustainable Travel
IM(a)	Impact on the Road Network
IM(b)	Walking and Cycling
IM(c)	Parking Standards

4. Supplementary Planning Guidance / Documents – the following planning guidance / documents are considered relevant:

- Royal Borough of Greenwich Standards for Houses in Multiple Occupation (April 2019)
- New Developments: Guidance Notes for the Storage and Collection of Waste and Recycling Materials for the Royal Borough of Greenwich (May 2018)
- Royal Borough of Greenwich Urban Design Guide (SPD) (2023)