

Local Area Planning Committee

26th November 2024

Agenda Item: 6

Reference No: 23/2710/F

Planning Documents: [Link](#)

Applicant: UPP Architects + Town Planners

Agent: UPP Architects + Town Planners

Site Address:

**113 Gregory Crescent,
Eltham, London, SE9 5RU**

Ward: Middle Park and Horn Park

Application Type: Full Planning Permission

1. Recommendation:

- 1.1. The Committee is requested to **GRANT** full planning permission for the following proposal:

“Erection of two storey dwelling house (C3 Use) (1 x 2 bed) with rear roof dormer, creation of two new crossovers from Gregory Place to create two hard stand parking spaces and associated waste and cycle storage. (reconsultation of amended plans)”

- 1.2. As part of the above, the committee is also recommended 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), 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	285.3m ²
Heritage Assets	None impacted

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Flood Risk Zone	Flood Zone I (No flood risk assessment required - Low probability of flooding from rivers and the sea)
Local Plan Allocation	None

Proposed Building	
Building height (metres)	5.8 metres at the eaves, 8.8 metres maximum
No. of storeys	2

Housing	
Housing Standards	The proposed units would meet the required floor space standards as set out under the Nationally Described Space Standards and Table 3.1 of Policy D6 of the London Plan (2021).
Additional Unit Mix:	1x 2b 3p unit

Transportation		
Car Parking	No. of car parking spaces proposed	1 additional space (2 across the site in total)
Cycle Parking	No. Proposed Cycle Parking	2 for the new dwelling.
Public Transport	Public Transport Accessibility Level (PTAL) Rating	1b (Poor level of access to public transport links)

Public Consultation	
Number in support	0
Number of neutral comments	1
Number of objections	13

Main Concerns raised:	<ul style="list-style-type: none"> - Concerns that the existing building at No. 113 is currently used as an HMO. - Concerns regarding the developments design impact on the character of site and surrounding area - Concerns regarding the developments impact on neighbouring amenity.
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- 2.2. The application has been called into the Local Planning Committee because it has received thirteen (13) objections from interested local parties.
- 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 1.1 above.

3. **Site and surroundings**

- 3.1. The subject site currently comprises No. 113 Gregory Crescent and land to the side of this building located to the east of the existing dwellinghouse. The site is located on the northern side of Gregory Crescent, with a pedestrian path which circumnavigates a patch of greenery surrounding a cul-de-sac of the road located to the immediate east of the site.
- 3.2. No. 113 Gregory Crescent itself bounds no. 111 Gregory Crescent to the west and no. 115 Gregory Crescent to the north.
- 3.3. The surrounding area is primarily residential in nature and consists mainly of two-storey properties, with moderate similarities in their design and appearance, with characteristic gaps between groups of terraced properties.

- 3.4. The site is located within Flood Zone I, which means it has a low probability of flooding from rivers and the sea (Flood Risk Assessment not required as defined by the NPPF). It has a PTAL (Public Transport Access Level) rating of 1b (on a scale of 0-6b where 6b represents the highest level of accessibility) and is not located within a Controlled Parking Zone (CPZ).
- 3.5. The subject site is not located within a Conservation Area, does not contain, nor is located within close proximity of a locally or statutorily listed building, and there are no relevant Article 4 Directions applicable to the site.

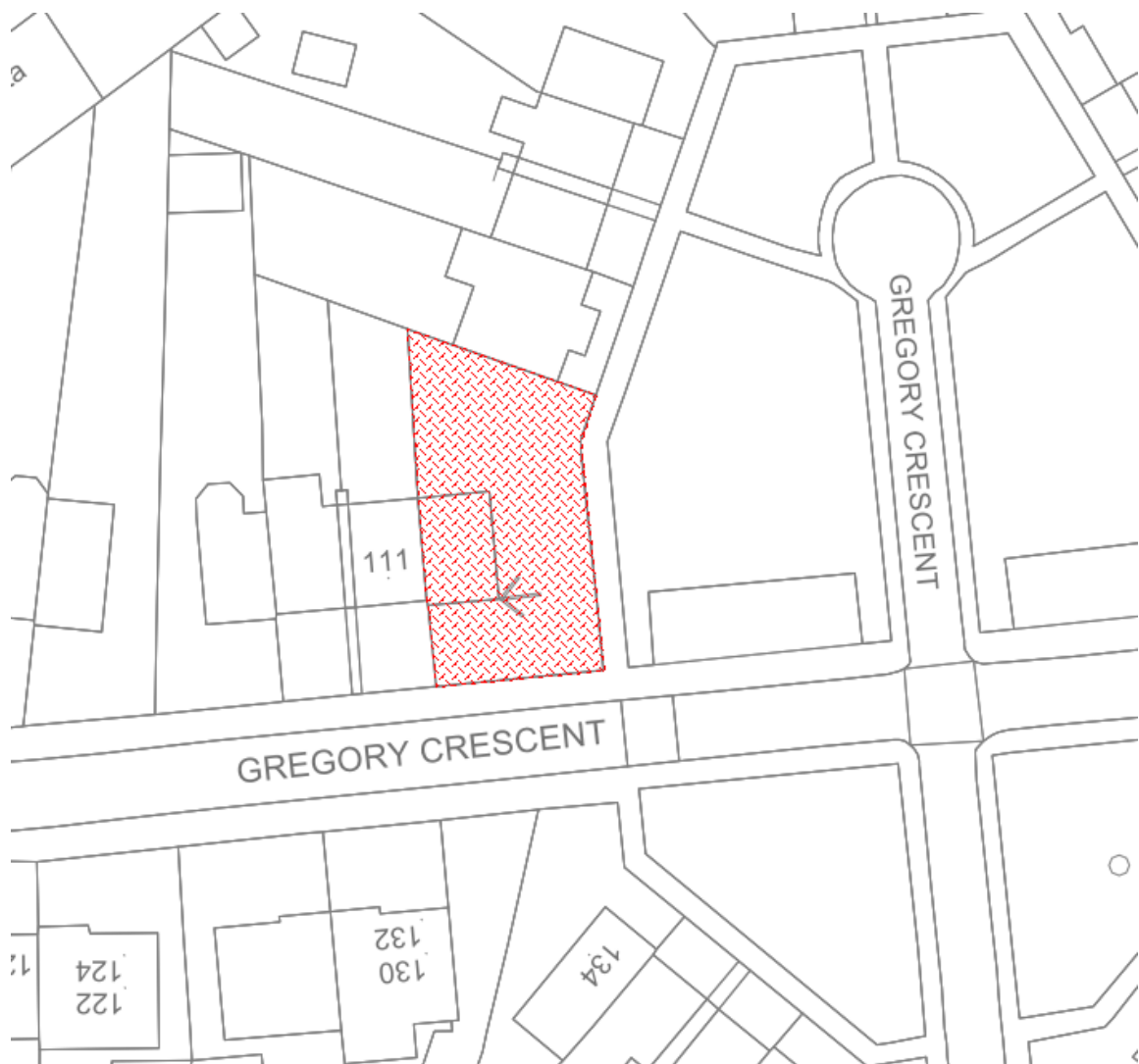


Figure 1: Site plan

4. **Relevant planning history**

4.1. *113 Gregory Crescent, Eltham, London, SE9 5RU*

Planning application 22/2867/F was **refused** on 24/11/2022 for “Construction of a two-storey side extension and single-storey rear extension to facilitate the conversion of the existing dwelling (Class C3) into 8 HMO units (Sui Generis).”

Reason for refusal 1:

The proposed development, by reason of the width of the two storey side extension, positioning in line with and forward of the host property, lack of set back from the front wall at 1st floor level and cumulative impact due to the wrap around nature at ground floor level along would result in a bulky and dominating extension which would fail to appear subordinate to the host property and would be harmful to the appearance of the street scene and the uniform character of the area. The proposal would therefore conflict with 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 Council's Residential Extensions, Basements and Conversions SPD (December 2018).

4.2. *115 Gregory Crescent, Eltham, London, SE9 5RU (adjacent property)*

Planning application 19/3428/HD was **approved** on 19/11/2019 for “Construction of single storey side extension with enlarged front porch and other associated external alterations.”

4.3. Planning application 19/2521/CP was **refused** on 10/09/2019 for “Construction of a single storey side extension and front porch.”

Reason for refusal 1:

The proposed side extension would extend beyond the principal elevation of the original dwellinghouse due to the ‘stepped’ design of the house created as a result of the front facing gable which projects further forward than the other parts of the front elevation. The proposal is therefore not compliant with Schedule 2, Part 1, Class A, Criteria A.1(e) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Reason for refusal 2:

The enlarged part of the dwellinghouse would extend beyond a wall forming a side elevation of the original dwellinghouse and would have a width that is greater than half the width of the original dwellinghouse. As such, the proposed side extension does not comply with Schedule 2, Part 1, Class A, Criteria A.1(j)(iii) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Reason for refusal 3:

The proposed porch would have a maximum height of 3.74 metres above ground level which exceeds the 3 metre restriction under permitted development. The proposal is therefore not compliant with Schedule 2, Part 1, Class D, Criteria D.1(c) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

- 4.4. Planning application 19/1489/HD was refused on 13/06/2019 for “Construction of a single storey side and front extension, incorporating front porch.”

Reason for refusal 1:

The proposed side and front porch extensions, by reason of their scale, appearance, prominence and poor roof design, coupled with an inappropriate forward projection, would appear as highly visible and incongruous additions which would unbalance the terrace block, to the detriment of the appearance of the host property, the wider terrace and the street scene. As such the proposed development does not comply with Policies 7.4 and 7.6 of the London Plan (2016), Policies DH1 and DH(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and the Royal Greenwich Residential Extensions, Basements and Conversions Guidance SPD (December 2018).

5. Proposal

- 5.1. The application seeks planning permission of the construction of a two-storey 2-bedroom-3-person end-of-terraced dwellinghouse with a rear dormer, creation of two new crossovers from Gregory Place to create

two hard stand parking spaces and associated waste and cycle storage to the east of the dwellinghouse at 113 Gregory Crescent.

- 5.2. Officers note that within the loft of the proposed dwellinghouse, an office has been included within the proposals. However, as further discussed in section 11: Quality of accommodation, the room would not be suitable for use as a bedroom, with it not complying with the Nationally Described Space Standards and Table 3.1 of Policy D6 of the London Plan (2021), specifically with respect to its extremely low floor to ceiling height. It is for this reason that within this assessment, the proposed property is regarded as a 2-bedroom-3-person property as submitted by the applicants.
- 5.3. The proposed building would feature a hipped roof and a rear dormer projecting from the rear roof slope. It would measure circa 5.6 metres in width, 9.2 metres in depth, 5.8 metres in height at the eaves and 8.8 metres maximum height.
- 5.4. The dwellinghouse would feature a flat-roofed rear extension element with rear sliding doors, that would project 1.95 metres beyond the rear elevation of the dwellinghouse, have a width of 5.6 metres, and a height of 2.95 metres.
- 5.5. It would also feature a small rear dormer on the rear elevation, which would have a width of 1.9 metres, maximum depth of 2.4 metres, and a height of 2.0 metres.
- 5.6. The proposed works would be done using materials that would match that of the existing property and other properties along the terraced row.
- 5.7. Since the validation and registration of the application, the applicant's team has submitted revised drawings in response initial concerns raised by officers and representations received.

6. Consultation

- 6.1. The application was first submitted in August 2023. Since its validation and registration, it has been subject to initial full public consultation, with

relevant parties having been further consulted following the submission of modified drawings.

6.2. The most recent consultation comprised of the following:

- **Eleven (11)** neighbour consultation letters were sent out to the occupiers of the host property and adjacent neighbouring properties on **5 April 2024**;
- **One (1)** amenity group – Eltham Society was consulted on **5 April 2024**;
- **Two (2)** Ward Councillors were notified on **5 April 2024**;

6.3. As further information was received after the beginning of the public consultation as a result of proactive discussions with the applicant’s team, re-consultation was undertaken due to the scale of the modifications made to the original submissions.

6.4. A summary of the consultation responses received since the initial consultation period from local interested parties and relevant consultees are set out in the tables and paragraphs below, along with the relevant planning officers’ comments:

6.5. Local Interested Parties

Issues/Points raised	Officers’ comments
The dwellinghouse at 113 Gregory Crescent is being used as an unlawful HMO.	This is not a planning concern within the limits of this application for the construction of a new dwelling next to No. 113.
Concern that the new dwellinghouse would be used as a HMO.	The application is for C3 unit, rather than a HMO. This is therefore not a relevant consideration in this case.
Planning statement has inaccuracies in its content.	This has been noted by officers. The submission is considered reasonably accurate so as make an assessment on this submission.
There is no need for the proposed rear dormer if replicating the design of the terrace.	This is discussed further in the design section of the report. The application is assessed as submitted.

Granting permission will result in a future subdivision	This is not a planning consideration, the proposal is not for further subdivision but is only assessed on the basis of the submission.
Concern is raised on the impact of the development on the existing sewage system.	This is not a planning concern within the limits of the current application. This is for consideration through Building Regulation requirements rather than at planning stage and for Thames Water to consider rather than the LPA.
The development will spoil the look of the surrounding area.	This is discussed further in the design section of the report.
Concern over impact on highway network.	This is discussed further in the transport and access section of the report.
Concern that the development would set a precedent.	This is not a material consideration as all applications are assessed on their own merits and on the basis of development plan policy only.
Concern over who will reside in the proposed dwelling.	This is not a material planning consideration.
The drawings show a proposal for a three-bedroom house.	This is addressed in the quality of accommodation section of the report. The proposal only brings forward two bedrooms.
Concern is raised in terms of neighbouring amenity, particularly with respect to neighbouring amenity.	This is discussed further in the impact on neighbouring amenity section of the report.
The proposal will end up like the previously refused application on this site.	The relevant application 22/2867/F was refused on 24/11/2022 for the following reason: <i>“The proposed development, by reason of the width of the two storey side extension, positioning in line with and forward of the host property, lack of set back from the front wall at 1st floor level and cumulative impact due to the wrap around nature at ground floor level</i>

	<p><i>along would result in a bulky and dominating extension which would fail to appear subordinate to the host property and would be harmful to the appearance of the street scene and the uniform character of the area. The proposal would therefore conflict with 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 Council's Residential Extensions, Basements and Conversions SPD (December 2018)."</i></p> <p>This current application is for a separate dwellinghouse and is assessed on its basis as a new dwelling rather than a bulky extension to an existing building.</p>
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6.6. Internal Consultees

Consultees	Comments
<u>RBG Transport & Highways:</u>	<p><i>"No highway objection is raised.</i></p> <p><i>If granted, it is recommended that any permission has an informative for the applicant to contact Greenwich Highways regarding the formation of a vehicular crossover that will be constructed by this council at developer expense."</i></p> <p>Officer's comment: <i>This is noted and referred to in the Transport and Access section of the report.</i></p>
<u>RBG Waste Services:</u>	No comment received
<u>RBG Pollution:</u>	No comment received

<p><u>RBG</u> <u>Occupational</u> <u>Therapists</u></p>	<p>More information provided in a separate table sent by consultee.</p> <p><i>“I have now reviewed this application and note that there are a few areas that should be addressed before planning permission is granted, to ensure that the requirements can be met:</i></p> <p><i>Areas that can be confirmed either now or at Submission of details stage are indicated in green.”</i></p> <p>Officer’s comment: <i>The applicants have been contacted proactively and provided modified drawings. Relevant accessibility conditions are therefore sought to be attached to the decision notice.</i></p>
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6.7. Amenity Groups

6.8. No representations were received from amenity groups.

6.9. Councillors

6.10. No representations were received from Councillors.

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, including:

National Planning Policy Framework (NPPF) (2023)

The London Plan: The Spatial Development Strategy for Greater London “London Plan” (2021)

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

Royal Greenwich Urban Design Guide Supplementary Planning Document “SPD” (2023)

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

8. Principle of development

- 8.1. 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.

Creation of new residential unit(s)

- 8.2. The Royal Borough of Greenwich makes a major contribution to London’s housing provision, having the third largest target for new housing of all London Boroughs. It is vital that the Royal Borough’s unique housing needs are met, while still contributing to the overall London housing numbers. The NPPF (2023) supports the delivery of sufficient homes to meet current housing needs.
- 8.3. Policy GG2 of the London Plan (2021) seeks to make the best use of land while Policy GG4 recognises the need for more homes and the provision of more choice for Londoners in a way that meet their needs at an affordable price. The Royal Borough of Greenwich has been set a minimum annual average housing target of 2,685 by the Mayor of London for the 2015-2025 period. The Council’s housing target is 38,925 units over a 15-year period as stated in Policy H1 of the Core Strategy. London Plan Policy H2 notes that Boroughs should pro-actively support well-designed new homes on small sites (identified as being below 0.25 hectares in size) and that of the 28,240 new homes to be delivered these sites should accommodate 3,010 dwellings.
- 8.4. In response to the continuing demand for housing in London, the Borough’s Core Strategy (2014) states that Royal Greenwich will continue to make a major contribution to London's housing provision.

At the same time, the unique housing needs of the Borough must be met, having regard to the size, type, density and affordability of homes.

- 8.5. The provision of residential accommodation on the site would assist in meeting the housing targets of Royal Greenwich and London in general. The acceptability of the proposal is subject to it demonstrating a high-quality design, a high-quality living environment for the prospective occupiers and not having any unacceptable adverse amenity and other impacts that are discussed below.

New infill development

- 8.6. Core Strategy Policy H(c) states that due to the pressure for land for new housing in Royal Greenwich, infill and backland sites are increasingly considered for housing development. However, it states that in order for such developments to be considered acceptable, they must comply with the following criteria:

Policy H(c) Criteria	Assessment
i. There is no unreasonable reduction in the amount of amenity space enjoyed by existing residents, especially for those in houses with the shared use of a garden;	The proposal would result in the loss of rear amenity space of the existing property at No. 113. However, this would remain more than the 50m ² required by the RBG Core Strategy (52.19sqm) for properties with three bedrooms or less.
ii. There is no unreasonable loss of privacy from overlooking adjacent houses and/or their back gardens (also see policy DH(b));	It is considered that the proposed development would not result in any unreasonable loss of privacy. A detailed assessment on residential amenity impact is included further below within this report.
iii. There is no unreasonable increase in noise and disturbance from traffic gaining access;	Noise and disturbance would remain similar to existing levels, noting the residential character of the area and that the proposal would not have any off-street parking provision. The provision of off street car parking spaces on the site is incredibly

	common in the surrounding area and would not result in any unacceptable noise and disturbance beyond the levels already experienced in the surrounding area. Compliance with this part would therefore be achieved.
iv. There is no significant loss of wildlife habitats, particularly trees or shrubs which would adversely affect the appearance and character of the area; and	There is no evidence to suggest that the redevelopment of the site would result in the loss of any identified wildlife habitats. The application is not within a Site of Nature Conservation Importance and would not result in the loss of any trees. Therefore, the proposal would comply with this criterion.
v. The character of the area is maintained with particular regard to the scale, design and density of the development.	On the whole, the proposal is considered to be acceptable with respect to visual amenity, scale and design, noting that it is built in a similar style to the other properties along the host terrace. This is further discussed in detail in the design section of this report (Section 9).

Summary

- 8.7. Overall, the principle of the development is therefore supported subject to ensuring a high-quality neighbourly design with consideration to the quality of accommodation provided, transport and access, the waste and servicing arrangements as well as other material planning considerations. These matters are addressed in detail below.

9. Design

- 9.1. The NPPF 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.

9.2. 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:

- a) 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
- b) 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.

- 9.3. Policy D3 of The London Plan: Spatial Development Strategy for London (2021) requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The optimisation of site capacity means ensuring that development is of the most appropriate form and land use for the site.
- 9.4. Policy DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Core Strategy) (2014) requires new development to be of a high quality, which should positively contribute to the improvement of both the built and natural environment. 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 streetscene 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.
- 9.5. Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (Core Strategy) (2014) sets out that new residential development, redevelopment, refurbishment or conversions will be expected to achieve a high quality of housing design and an integrated environment. The Royal Borough will take into account the key relationships between the character of the area, site location and housing densities.
- 9.6. Advice is also given in Royal Greenwich Urban Design SPD, which was adopted in October 2023.
- 9.7. Principle C.1.3 (Infill Development) states that infill developments should be strongly linked to the character of the place and should support the overall cohesion of the townscape. Furthermore, typically infill developments should take cues from the surrounding built form in terms of scale, massing, height, building, roof and parapet lines, articulation of the facade, open to solid ratio, materiality and colour spectrum.
- 9.8. Furthermore, Principle D.15 (Scale and Massing) requires the scale and massing of a development to positively contribute to place making. The scale and massing of the development should be developed in response

to the grain height and massing characteristics of the built form in the surrounding area.

- 9.9. Principle F2 (An Appropriate Height Approach to their Locality) as set out within the Urban Design Guidance SPD (2023) states that the scale, massing and height of a building should relate to the local existing or emerging character of the place where it is located. It is acknowledged that heights may not be uniform across an area, but that they should appropriately respond to their immediate context.
- 9.10. Where a street or area is characterised by a relatively coherent approach to development scale, form and streetscape, new development will be expected to be coherent and well-integrated. Approaches to height may vary slightly to express important building corners at nodes or intersection where this could help the distinctiveness and legibility of an area and where this is justified in relation to the specific site context.
- 9.11. The proposal involves the construction of a new two-storey dwelling on an infill site to the east of 113 Gregory Crescent, which is currently vacant paved land. This proposal would effectively make the new dwelling an end-of-terrace property. The dwellinghouse would be similar in appearance as those surrounding it, and the general form of the dwellinghouse in terms of its terraced appearance, materiality and opening form. It would exist as a generally be characteristic in relation to the appearance of the surrounding dwellinghouses. The doors, front porch and windows on the proposed dwellinghouse would also be of similar scale and form to that as part of other nearby properties.
- 9.12. The proposal at hand would comply with Policy D3 of the London Plan (2021), which notes the importance of responding to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality, which in this instance is the open character of the surrounding.
- 9.13. The proposal features a full-width rear extension element, which would extend 1.95 metres beyond the rear elevation of the dwelling. This would be seen as a secondary element to the main dwellinghouse, and significantly below the 3.6 metre recommended maximum projection seen for regular rear residential extensions within the borough as set out by Principle I.3.3 of the RBG Urban Design Guide SPD (2023).

- 9.14. The proposal also includes the addition of a small rear-facing dormer which would appropriately align with the western first floor rear-facing window and be a secondary element protruding beyond the rear-facing roof slope. This element would follow the guidance stated on dormer additions as seen in para. i.66 of the RBG Urban Design Guide SPD (2023), which states that dormers at the rear are generally acceptable, subject to the building typology. In accordance with the SPD recommendations, the dormer proposed is well proportioned within the roof and positioned within the existing roof slope and would reflect the position of the existing windows below. The roof form of the new dormer element also responds well to the roof form of the terrace with which it seeks to form part, and the dormer is well set away from the ridge (by between 0.6 metres and 2.3 metres as a result of its hipped roof form) and the eaves of the new roof of the property (by 1.3 metres).
- 9.15. Furthermore, officers to note that certain objections raised awareness to the likeliness of this scheme to a previously refused application ref. 22/2867/F, dated 24/11/2022. This scheme was a wholly different from this previously refused proposal and so holds limited weight in the assessment of this application.
- 9.16. The surrounding area is characterised by the existence of patches of open area situated between terrace blocks. The proposal would result in the loss of some of this open space between 113 and 115. However, the design has been made so that a significant level of space is still retained with the dwellinghouse not going up to the boundary wall. This would maintain the open character of the site and the surrounding area.
- 9.17. In conclusion, the proposal is acceptable on design terms and would comply with Policies D3 of the London Plan (2021), Policies DH1, H5 and H(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014) and the Councils Urban Design Guidance SPD (2023).

10. Housing mix

- 10.1. Core Strategy Policy H2 states that a mix of housing types and sizes are required in all developments including conversions and should contain a proportion of 3, 4 and 4+ bedroom units. The exact mix on each site will vary according to the location of the development and the character of the surrounding area and will be affected by factors such as the level of accessibility to public transport, or where there is a poor external environment, for instance. This is supported by Policy H10 of the London Plan.
- 10.2. While housing mix is not particularly relevant to the subject proposal given that only one dwellinghouse is proposed, the proposed development in the form of a 2-bedroom 3-person dwelling is considered acceptable given the only limited provision of units in this instance.

11. Quality of accommodation

Internal space standards

- 11.1. Policy D6 of the London Plan states that housing development should be of a 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. This is echoed by Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies which requires that new residential development, redevelopment or conversions to provide a high quality of housing design and environment. In this regard, the proposed residential accommodation should comply with the specific standards as set out in the Nationally Described Space Standards (NDSS) and Table 3.1 of London Plan Policy D6.
- 11.2. In accordance with the submissions, the proposal is for the construction of a two-storey two-bedroom three-person (2b3p) dwellinghouse, rather than the 3-bedroom-4-person dwellinghouse mentioned in the proposal summary. The internal space standards assessment is as follows:

Unit type	Requirement	Proposed	Pass/Fail
2-bedroom 3-person (2b3p) two-storey dwellinghouse	Minimum gross internal floor area (GIA) – 70m ²	87.2m ²	Pass
	Floor to ceiling height – 2.5m for at least 75% of the GIA (London Plan)	2.5m for at least 75% of the GIA	Pass
	Double bedroom – minimum area of 11.5m ² and at least 2.75m wide; every other double bedroom is at least 2.55m wide	Bedroom 1: 11.5m ² with a minimum width of 2.9m .	Pass
	Single bedroom – minimum area of 7.5m ² and at least 2.15m wide	Bedroom 2: 7.5m ² with a minimum width of 2.3-2.85m	Pass
	Minimum built-in storage – 2m ²	2.2m ²	Pass

- 11.3. As can be seen from the above table, the proposal would comply with the internal space requirements of the NDSS and London Plan Policy D6, except that in respect of floor to ceiling height and the provision of built-in storage.
- 11.4. With regard to floor to ceiling height, the proposed dwellinghouse would achieve 2.5m or more for at least 75% of the GIA complying with the requirements of the NDSS and the London Plan Policy D6, with most of the ceiling height reaching exactly 2.5 metres. The floor-to-ceiling height of the building is formed in a way that replicates the arrangement of the existing properties along the host terrace, and as such, there is naturally a more limited floor to ceiling height area for the uppermost rooms, which are sought to be non-habitable study space with storage.

- 11.5. This non-habitable study space has not been considered as a bedroom within this application site. This is because the floor to ceiling height would be 2.06 metres, which would not leave reasonable space to be to the adequate standard for a bedroom configuration.
- 11.6. In terms of built-in storage, the proposed provision of 2.2m² falls complies with the required provision of 2m² for the subject unit type. Officers do no note that the annotations within the drawings present values for the area which are different to those found when assessed and measured by officers. Nevertheless, the requirement is comfortably met, and this is considered to be acceptable.
- 11.7. In view of the above, the proposed development is on balance considered to provide an acceptable quality of internal accommodation.

Private amenity space

- 11.8. In relation to the provision of private outdoor amenity space, Policy D6 of the London Plan requires 5m² for 1-2 person dwellings and an extra 1m² for each additional occupant with a minimum width and depth of 1500mm. This is supported by Standard 26 of the Mayor of London's Housing SPG (2016). Policy D6 of the London Plan also states that the London Plan standard only applies when there are no higher local standards. In this regard, Policy H5 of the Core Strategy states that family housing should normally have direct access to a private garden; supporting paragraph 4.1.30 states that family housing is considered to have three or more bedrooms. Paragraph 4.1.31 further states that as a guide, a minimum garden area of 50m² should be provided in houses with up to three bedrooms and an additional 15m² provided for each additional bedroom.
- 11.9. The proposed 2-bedroom dwellinghouse would benefit from a private amenity space that measures around 61.0m², which meets the minimum garden area of 50m² as suggested by Paragraph 4.1.31 of the RBG Core Strategy (2014). The rear garden space would be formed from the splitting of the existing rear garden space of no. 113 Gregory Crescent. As a result of the works, 113 Gregory Crescent would remain with approximately 52.8m² of rear garden space.

Outlook, light and privacy

- 11.10. Policy D6 of the London Plan states that development should minimise the number of single aspect dwellings and ensure that adequate cross ventilation is secured. Homes should provide for direct sunlight to enter at least one habitable room for part of the day.
- 11.11. There are also other standards within the Mayor of London's Housing SPG which focus on the internal amenity of future residents. Standard 28 requires that habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Standard 29 promotes dual aspect dwellings to optimise access to daylight and sunlight, natural ventilation, thermal control, pollution mitigation, views and internal flexibility/adaptability. Standard 32 requires that at least one habitable room (preferably kitchen, dining and living spaces) should receive direct sunlight for part of the day.
- 11.12. The proposed development would primarily be dual aspect with openings on the northern and southern elevations, while there are also two small windows on the eastern elevation that would provide sunlight from the east into the ground floor living space and the first-floor master bedroom. These small windows would look out onto the green space adjacent to the property. The mainly dual aspect design would provide the dwelling with an adequate level of direct sunlight, in accordance with Policy H5 of the Core Strategy which discourages single aspect north facing units and presumption in favour of dual aspect units where possible. On the whole, it is considered that the proposed development would benefit from adequate daylight, sunlight and outlook through their windows on its front and side elevations.
- 11.13. With regard to privacy/overlooking impact, it is noted that the north-facing windows on the property, more specifically on the first floor and on the rear dormer, would face towards the property at 115 Gregory Crescent and a small southern facing window, which is around 11.9 metres in distance from the main section of the proposed dwellinghouse. The window on 115 Gregory Crescent would be deemed minor in its sizing and is in fact a w/c window and not of a habitable room. Therefore, it is deemed that there would no possible elements of privacy or overlooking impacts.

11.14. The rest of the openings including all the windows and openings would afford a good degree of privacy for prospective occupiers. Further assessment on residential amenity including impact of the proposal on neighbouring properties is detailed in the Impact on neighbouring amenity of this report.

12. Accessibility

12.1. Policy D7 of the London Plan outlines that new housing must meet building regulation M4(2) 'accessible & adaptable dwellings'. London Plan Policy D5 requires developments to be designed to be convenient and welcoming with no disabling barriers which can be entered, used and exited safely, easily and with dignity for all. This is also reflected in Policy DHI of the Core Strategy.

12.2. London Plan Paragraph 3.7.5 makes clear that as set out in Approved Document M of the Building Regulations, Volume 1: Dwellings, to comply with requirements M4(2) or M4(3), step-free access into the dwelling must be provided.

12.3. As a result of proactive discussions with the applicant's team, revised drawings and further information have been submitted to clarify the proposal's compliance with the relevant accessibility requirements. This included small alterations to the size of the door nibs, layout of the bathrooms, and the gradients of approach routes to the dwellinghouse.

12.4. On the whole, the proposed development is considered to be acceptable with regard to accessibility in land use planning terms, notwithstanding that further details may need to be resolved as part of the Building Regulations regime which is separate to planning.

13. Impact on neighbouring amenity

13.1. Policy DH(b) of the Core Strategy requires new development, including extensions and renovations, to demonstrate that there would be no significant loss of amenity to adjacent or nearby properties, by reducing

the amount of daylight, sunlight, privacy or outlook they enjoy, or by creating an unneighbourly sense of enclosure.

- 13.2. Core Strategy Policy E(a) also states that planning permission will not normally be granted where a proposed development would 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. Safeguarding against noise pollution is also covered in part by London Plan Policy D14 and Policy D13.
- 13.3. Policy H(c) of the Core Strategy further makes clear that residential development on backland and infill sites should not result in any unreasonable reduction in the amount of amenity space enjoyed by existing residents and there should be no unreasonable loss of privacy from overlooking adjacent houses and/or their back gardens. There also should not be any unreasonable increase in noise and disturbance.
- 13.4. Further to the above, the Council's Urban Design Guide Supplementary Planning Document (SPD) (2023) provides useful guidance for the determination of planning applications, especially in relation to impacts on residential amenity.
- 13.5. Para i.13 of the SPD makes clear that proposals must demonstrate that they would not result in an unacceptable loss of privacy to neighbouring properties or gardens. Window positions, angles, distance and orientation are fundamental considerations, as highlighted in para. i.14. Moreover, para. i.15 states that as a general principle, proposed extensions should not significantly overshadow windows to neighbouring habitable rooms, private gardens or terraces, nor should any extension or new dwelling have a significant negative impact on daylight received; habitable room is defined as any room used or intended to be used for sleeping, cooking, living or eating purposes, as made clear by para. i.16. The use of the BRE's Site Layout Planning for Daylight and Sunlight guidance in assessing impact to daylight, including the general 25° and 45° guidelines is encouraged (though not required) by para. i.17.
- 13.6. As per para. i.18, extensions and new dwellings that create an unacceptable sense of enclosure and level of overshadowing, extensions

that dominate principal views from neighbouring windows, and extensions that appear unsightly or overbearing from the neighbouring properties or gardens are unlikely to be granted permission.

- 13.7. The subject site bounds 115 Gregory Crescent to the north and would bound the host property, 113 Gregory Crescent to the west. The proposed development is not considered to have any particular residential amenity impact on other neighbours that do not abut and are sited further away from the application site; no detailed assessment is considered necessary with regard to the amenity of these other neighbours.

No. 115 Gregory Crescent

- 13.8. In terms of access to daylight/sunlight and the creation of an unneighbourly sense of enclosure, there would not be an unacceptable impact on the residents of no. 115. This is due to the substantial separation distance of the new dwelling from this property (12m to the nearest side window), and also due to the fact that there is only one window at this property, deemed a non-habitable window that would face in the direction of the new property. It is also noted that the position of the development away from No. 115 is no different from the positioning of No. 113 Gregory Crescent as already existing at the site.
- 13.9. In terms of overlooking/privacy, there would not be an unacceptable impact on the residents of no. 115. This is due to the fact that views from the rear of the new dwelling towards no. 115 would only face towards a relatively small non-habitable window. Views towards the garden area of no. 115 would also be partly obscured by the respective dwellinghouse, and any impact experienced would not be deemed unacceptable. Any views to the rear garden of this property from the rear windows at the new dwelling to No. 115 Gregory Crescent would be no different from those which already exist from the existing building at No. 113 Gregory Crescent. It is found that the views from the rear dormer would present a level of overlooking, however, due to the distance between the properties and the viewpoint being straight into a non-habitable window, it would not be an unacceptable impact.

No. 113 Gregory Crescent

- 13.10. In terms of access to daylight/sunlight, there would not be an unacceptable impact on the residents of no. 113. The main windows that are impacted are the two side windows that serve non-habitable rooms, which are to be blocked up by the addition of the dwelling. Given these openings are non-habitable and serve a bathroom and a landing, the overall amenity enjoyed by No. 113 would not be unacceptably harmed should the proposal go ahead through the blocking up of these windows. Given the limited depth of the proposed extension element, this addition would not result in any unacceptable loss of daylight/ sunlight impacts to No. 113.
- 13.11. Furthermore, the addition of the rear extension element would not result in any unacceptable impact, noting the orientation of the two properties relative to the road and noting the extremely limited depth of the proposed extension.
- 13.12. In terms of overlooking/privacy, there would not be an unacceptable impact on the residents of no. 113. This is due to the relative orientation of the two dwellings and the fact that no proposed windows would look into any habitable windows at no. 113. Whilst upper levels of the new dwelling would result in an increased level of overlooking to the rear garden of No. 113, this would not be substantially different to the overlooking experienced by other upper level windows at surrounding properties, and this level of overlooking is common for terraced properties.
- 13.13. In terms of an increased sense of enclosure, there would not be an unacceptable impact on the residents of no. 113. The location of the proposed dwelling in relation to no. 113, the fact that the rear extension element is of a minor 1.9 metre projection, and the fact that it is an end of terrace property, which would leave the open space – currently part of the rear garden of no. 113 intact, would result in no unacceptable impact.

14. Transport and access

- 14.1. The application site has a PTAL of 1b (on a scale of 0-6b where 6b represents the highest level of access), which indicates that the site has a relatively poor level of access to public transport.

Cycle parking

- 14.2. Policy T5 of the London Plan states that the Mayor is committed to cycling in London and to improve the experience of cycling by providing safe and attractive routes that encourage people to cycle more. The London Plan specifies minimum cycle parking standards in Table 10.2, including for residential developments which should provide 1 cycle space per 1-bedroom 1-person unit, 1.5 space per 1-bedroom 2-person unit and 2 spaces per all other units. For developments with over 5 units, 2 short stay cycle spaces should be provided. This is supported by Policies IM4 and IM(c) of the Core Strategy.
- 14.3. London Plan Policy T5 also makes clear that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards (LCDS). The LCDS specifically requires that cycle parking is located in an area that is accessible, convenient, secure and sheltered.
- 14.4. It is noted from the submissions that a bike store is proposed in the private rear garden to provide 2 long-stay cycle parking spaces. The proposed bike store would measure approx. 1.8m deep, 1.1m wide and unspecified height.
- 14.5. The cycle parking provision for the proposed dwellinghouse is considered to be acceptable, provided that a condition is secured for a detailed specification of the cycle space to be submitted to the local planning authority, and that the provision to be made prior to first occupation in the event of approval. On the whole, it is considered that the proposed cycle parking is consistent with Policy T5 of the London Plan and Policies IM4 and IM(c) of the Core Strategy.

Vehicle parking

- 14.6. According to the residential car parking standards outlined in Table 10.3 of the London Plan (2021) under Policy T6.1, residential development in an inner London location with PTAL 1b should have up to 0.75 spaces per dwelling. This is supported by Policy IM(c) of the Core Strategy.
- 14.7. The proposal brings forward one additional parking space, splitting the existing parking space found to the side and front of no. 113 into two spots towards the front of the properties.
- 14.8. Officers do note that the addition of one new parking space is more than the limit of 0.75 spaces per dwelling in Inner London PTAL 1b locations. However, it is noted that the presence of dedicated parking spaces is an established character along most of Gregory Crescent. Furthermore, allowing for the provision of on-site vehicle parking would reduce the reliance of on-street/kerbside parking, which is currently limited in availability and could detrimentally impact the highway network and pedestrian paths. Following consultation with the RBG Transport & Highways team, no objection was raised to the proposal in its current state. Furthermore, the application site is not located within a CPZ (Controlled Parking Zone). The proposed development with one vehicle parking space is supported, in accordance with the adopted policy framework which encourages sustainable travel and the reduced use of the private car and reduced negative impact for drivers and pedestrians.
- 14.9. In the interest of pedestrian mobility and in accordance with the Healthy Streets Approach that is embedded within Policy T2 of the London Plan, it is also considered appropriate that in the event of approval, a condition is secured requiring the applicant to contact RBG Transport & Highways regarding the formation of the proposed vehicular crossovers that will be constructed by the local planning authority at the developer expense.

15. Construction

- 15.1. Given the nature of the proposed works, the site's proximity to neighbouring properties and that Gregory Crescent is a notably narrow

street, it is anticipated that demolition and construction works would have some impact on traffic flow on Gregory Crescent and the amenity of neighbouring occupiers. Therefore, it is important to ensure that demolition and construction activities including logistics are managed carefully to minimise any impact on the road network as well as the emission of noise, dust and other pollutants.

- 15.2. In the event of approval, it is considered appropriate for a full construction management plan (CMP) to be secured by condition. The CMP should be provided at the submission of details stage and discharged prior to commencement of the work, in the interest of safeguarding the amenities of neighbouring properties and the area more generally, in compliance with Policies D14, S1 I and T7 of the London Plan (2021), Policy E(a) of the Core Strategy (2014), the Mayor's The Control of Dust and Emissions During Construction and Demolition SPG (2014) and the Council's Greener Greenwich SPD (2014).

16. Waste & Servicing

- 16.1. Core Strategy Policy DH1 and London Plan Policy S1 7 identify 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. The New Developments: Guidance Notes for the storage and collection of waste and recycling materials for the Royal Borough of Greenwich specifies the required bin capacity for development which should be adhered to. Adequate provision for waste recycling is also required by Policy H5 of the Core Strategy.
- 16.2. It is noted that a bin store with space for 2 x 240L bins would be provided at the new dwellinghouse's front garden. This is not considered to be sufficient for accommodating the waste generation of the proposed dwellinghouse.
- 16.3. In the event of approval, subject to a condition being secured to ensure that bin storage of 3 x 240L with similar specifications is provided prior to first occupation of the development for both properties, the proposal

would be acceptable in this regard in accordance with London Plan Policy SI 7, Core Strategy Policy DHI and the referenced Guidance Notes.

17. Sustainability

- 17.1. London Plan Policy GG6 stipulates that development must ensure buildings and infrastructure are designed to adapt to a changing climate which includes making efficient use of water. Policy SI 5 further states that developments should minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption). This is also stipulated by the Council's Greener Greenwich SPD (2014).
- 17.2. Policy SI 1 of the London Plan also states that development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site.
- 17.3. In light of the above, it is anticipated that conditions requiring the development to be designed to minimise mains water consumption and to ensure boiler emissions are at acceptable levels would be included in any prospective application approval.

18. Other material considerations

Housing land supply

- 18.1. The Council only has 2.46 years of housing land supply at present. This means that Royal Greenwich is not meeting the NPPF (2023) requirement for a five-year housing land supply. Consideration, therefore, must be given to paragraph 11 of the NPPF and the tilted balance. The relevant parts state:

Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 18.2. Out of date policies include, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites under the NPPF (with the appropriate buffer and exceptions, as set out in paragraphs 76-77 of the NPPF).
- 18.3. In this instance, given that the proposed development has been assessed to be consistent with the requirements of the adopted policy framework, it is considered to be acceptable in its own right and the tilted balance has not been engaged in reaching this conclusion.

BNG

- 18.4. Biodiversity Net Gain (BNG) came into force on the 2nd of April 2024 and is a way of creating and improving natural habitats.
- 18.5. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.
- 18.6. In this particular instance, whilst the application has been submitted on a full application form, the application was submitted before Biodiversity Net Gain came into force.
- 18.7. As such, the development does not need to comply with the BNG requirements

19. Community Infrastructure Levies

- 19.1. The proposal for the creation of a new residential dwellinghouse would be liable to MCIL2 and Royal Borough of Greenwich CIL.

20. Public Sector Equality Duty (PSED) and Human Rights

- 20.1. Under the Equality Act 2010 (as amended), 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. The subject planning application has been processed and assessed with due regard to the PSED. The application proposals are not considered to conflict with the Duty.
- 20.2. The application has also been considered in the light of the Human Rights Act 1998 (as amended) 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.

21. Implications for disadvantaged groups

- 21.1. There are no specific implications identified.

22. Conclusions

- 22.1. The proposed development would respect the character, appearance and setting of the host building and terrace, and the surrounding area. It would achieve good quality of living accommodation without having any unacceptable impact on the living conditions of neighbouring properties.
- 22.2. Accordingly, it is recommended that planning permission be granted for application reference 23/2710/F in line with Section 1.1 of this report.

Background Papers:

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

National Planning Policy Framework (2024)

The London Plan: The Spatial Development Strategy for Greater London
“London Plan” (2021)

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

Royal Greenwich Urban Design Guide SPD (2023)
Greener Greenwich SPD (2014)
East Greenwich Conservation Area Appraisal (2013)
Technical Housing Standards – Nationally Described Space Standard (2015)
Mayor’s Housing SPG (2016)
Mayor’s The Control of Dust and Emissions During Construction and Demolition SPG (2014)
New Developments: Guidance Notes for the Storage and Collection of Waste and Recycling Materials for the Royal Borough of Greenwich (2018)

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