



Development Management Delegated Report

Directorate of Regeneration,
Enterprise & Skills
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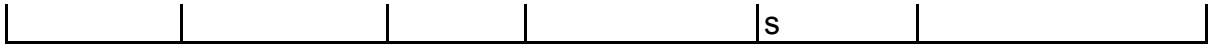
Case Ref No:	23/1013/F
Application Type:	Full Planning Permission
Location:	THE WHODA THOUGHT IT, 7 TIMBERCROFT LANE, PLUMSTEAD, LONDON, SE18 2SD
Ward:	PLUMSTEAD COMMON
Proposal:	Change of use of site from Public House (Sui Generis) to residential (Use Class C3), full demolition of existing Public House and construction of seven (7) two-storey terraced dwellings with associated landscaping, bin and cycle storage and one (1) accessible car parking space (Public House to be lost)

Recommendation	Refuse		
Expiry Date	17/05/2023	EOT	

Case Officer	Brendan Meade	Date:	17 May 2023
Report Agreed By		Date:	
Authorising Officer's Signature		Date:	

Listed Building:	L	Flood Zone	Sustainable Drainage
Conservation Area:	PLUMSTEAD COMMON		
CIL Liable	<u>Yes</u>	LDD	London Development Database

Site Notice	09/04/2023		
Press Notice	12/04/2023		
Objections	18	Support	6
Comment	1		



Site Description:

The site consists of a two-storey plus basement detached building known as 'The Who'd 'a' Thought It' which is a historic public house (Sui Generis) located on the eastern side of Timbercroft Lane. The pub is currently operating with a total gross internal floor space of 267sqm arranged over ground, first and basement floors and benefits from outdoor customer space to the front and rear of the site. The building is locally listed with the following listing description:

'Possibly early 19th Century with later ground floor extension to front added around 1878. 2-storey brick building, with front rendered and painted and having a projecting ground floor. Slated roof with gable ends, modern single storey parapeted flat roof extensions.'

A canopy and single storey outbuilding is sited to the north of the pub within the curtilage of the building and is used for car parking. Upon one of the site visits to the public house (16th May 2023) it appeared to still be operating, although it had been noted on other occasions officers have passed the site during times you would normally expect to find pubs trading, the public house has been closed.

The site also lies within the Plumstead Common Conservation Area and the site is identified in the Plumstead Common Character Appraisal (2010) as a building which makes a positive contribution to the special character of the conservation area within character area 2: The Slade between Lakedale Road and footpath across Common running from Chestnut Rise to Greenslade School – including The Slade, Greenslade School, The Slade Steps, Slade Ponds, Coombe, part of Sladedale Road, part of Roydene Road, & Tormount Road. This part of the Conservation Area is characterised by homogenous mid-19th century 2-storey terraced housing with dual pitched roofs, generally setback from the road and with modes rear gardens.

The site also forms part of an Area of Special Character surrounding Plumstead Common and its margins and is generally characterised by greenery and open spacing. The site contains several mature trees along the eastern boundary of the site which makes a strong positive contribution to the streetscene. It was noted from the site visit that the mature tree on the southern boundary which was considered to make a positive contribution to the Plumstead Common Conservation Area has been felled with only low-level shrubbery present along the boundary. The loss of this tree formed a reason for refusal for the previous application to redevelop the site.

However, it is not indicated on the applicant's plans; by virtue of their siting in a conservation area these trees are protected.

The site immediately to the north-east comprises of a row of six townhouses with rear dormers originally approved under planning reference 18/2773/F.

The site is in Flood Zone 1, an area least at risk from flooding and has a PTAL rating of 2 indicating a below average public transport accessibility level.

Proposed Development:

Planning permission is sought to change of use of site from Public House (Sui Generis) to residential (Use Class C3), with the full demolition and loss of existing Locally Listed Public House and construction of seven (7) two-storey terraced dwellings with associated landscaping, bin and cycle storage and one (1) accessible car parking space.

The proposal seeks to demolish the existing locally listed pub building and associated single-storey outriggers to allow for the construction of seven two-storey terraced dwellings. Each new dwelling would be similarly proportioned and would have a staggered front building line, recessing from north to south. The terrace row of dwellings would extend the entire width of the plot.

Each dwelling would provide three bedrooms with a front and rear garden. Each dwelling would also have a rear dormer and flat roof first-floor outrigger and a further single storey protrusion beyond. The front of the site comprises of a small panting area.

Cycle parking is contained to the rear and refuse storage within the front garden. A single disabled car parking bay is afforded to the northernmost unit with the rest of the development being car free.

Materials used comprise of white/light grey/dark grey brickwork and render for the external walls, aluminium windows and doors and slate roof tiles. A green roof is proposed for the first-floor outriggers with the rear dormer roofs being clad in grey.

The application is the second at the site following refused application 21/1945/F which sought to retain the public house on the site with an albeit reduce floorspace and to develop either side of the existing building in the form of five terrace two-storey dwellings. This was refused for five reasons outlined within the relevant planning history section below.

This application differs insofar as the locally listed public house building is to be totally demolish and the public house lost entirely. The application also seeks to increase the amount of housing on the site to seven two-storey terrace dwellings.

Relevant Planning History:							
<i>A p p</i> <i>Number:</i>	22/0973/TC	<i>Decision:</i>	Raised no objection	<i>D e c i s i o n</i> <i>Date:</i>			23/03/2022
<i>Address:</i>	The Whoda Thought it, 7 Timbercroft Lane, Plumstead, SE19 2SD						

<i>Description:</i>	Rear Garden - T1 Sycamore tree - Crown reduce Sycamore by overall of 2 metres, tree affecting no1 Mountbatten
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<i>A p p Number:</i>	21/1945/F	<i>Decision:</i>	Refused	<i>Decision Date:</i>	21/07/2021
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<i>Address:</i>	The Whoda Thought it, 7 Timbercroft Lane, Plumstead, SE19 2SD
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<i>Description:</i>	Extension of public house (following partial demolition) and the construction of 5 terraced dwellings with associated parking, vehicle crossovers and landscaping (public house to be retained).
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<i>Reason for refusal:</i>	<ol style="list-style-type: none"> 1. The loss of public house floorspace including the commercial kitchen is not justified because insufficient evidence has been provided to confirm that the public house to be retained would be commercially viable in the medium to long term and therefore the proposal fails to demonstrate that it would not deprive the local community of valuable public house occupying the site, contrary to Policy HC7 of the London Plan (2021) and Policy EA(b) of the Core Strategy (2014). 2. The proposed development, by virtue of its excessive scale and footprint and unsympathetic design as well as the proximity of the new build dwellings to the locally listed host building and the loss of the historic extension, would fail to preserve the character and appearance of the locally listed host building, the Plumstead Common Conservation Area, and the Streetscene generally, contrary to the NPPF (July 2021), Policies D3, D4 and HC1 of the London Plan (2021) and Policies DH1, DH3 and DH(h) of the Core Strategy and Detailed Policies (2014). 3. The proposed dwellings cannot reasonably comply with approved document M4(2) 'Accessible & Adaptable Dwellings' and would therefore fail to be accessible and inclusive to all members of society, contrary to Policies D5 and D7 of the London Plan (2021) and Policy DH1 of the Core Strategy (2021). 4. The proposed on-site car parking amounts to a gross overprovision of car parking contrary to the maximum parking standards as set out in Table 10.3 of the London Plan (2021) and would therefore undermine strategic efforts to reduce private car ownership and promote more sustainable forms of transport, contrary to Policies T6 and T6.1 of the London Plan (2021) and Policies IM4 and IM(c) of the Core Strategy (2021). 5. The development would result in the loss of or substantial harm to the mature tree along the southern boundary of the site which would harm the setting of the Plumstead Common Conservation Area as well as the streetscene generally and insufficient justification for the loss of this tree has been provided, contrary to Policies G5 and G7 of the London Plan (2021) and Policies OS(f), DH1, DH3 and DH(h) of the
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Neighbour Notification

Thirty-five (35) neighbours, three (3) councillors, the Friends of Plumstead Common, the Positive Plumstead Project and the Plumstead Common Environment Group were consulted on the 5th April 2023.

In addition, a site notice was posted near the site on the 9th April 2023 and press notice.

Twenty-four (24) representations were received in response to this consultation with 18 in objection and 6 in support. The objections are summarised below.

- Unacceptable impact on the local parking network
- Concern that the proposed development would exacerbate the existing car parking congestion along Timbercroft Lane
- Concern raised that the proposed development would exacerbate congestion within Timbercroft Lane
- The proposal would be to the detriment of the no. 291 Bus

Officer comment: These elements of the proposal are assessed within the highways and parking section below in the report.

- Insufficient information pertaining to the accessible car parking space.

Officer comment: The accessible car parking space is clearly marked on the plans as a disabled car parking bay serving the northernmost unit.

- Potential for the new dwellings to be used as HMOs.

Officer comment: Each dwelling is proposed to be used as single dwellinghouses (Use Class C3) and does not bring forward any plans to provide HMOs on the site.

- No site notice has been displayed.

Officer comment: A site notice was displayed outside the site on the 9th April 2023 with photographic evidence provided of this.

- Disruption during construction phase
- Additional units would lead to slower internet speeds for the existing surrounding dwellings
- The proposal may impact upon the water, gas and electricity metres for the dwellings at Flora Mews
- The old materials and debris from the pubs structure may contain carcinogens
- Loss of views
- Punch Taverns have a history of treating non-core pubs as short term investments
- The applicant is more interested in making money from the land rather than operating a pub

Officer comment: These are not material planning considerations.

- Insufficient information pertaining to waste collection

Officer comment: The waste collection and storage aspects of the proposed development are assessed under the waste section of the report below.

- Overdevelopment of the plot
- The building is an historic local landmark within a prominent location and its loss should be resisted.
- The proposal would result in the loss of one of the 'five idlers' of Plumstead Common.
- There is a discrepancy between the heritage statement submitted as part of application 21/1945/F and the current application with regard to the historic interest of the building and the impacts its loss would have on the wider conservation area.
- Plumstead's historic buildings should be protect.
- The proposed new dwellings would fail to be in keeping with the surrounding built form.
- The front roof slopes containing rooflights would not be sympathetic to the area
- The dwellings would be first new homes that are visible from Plumstead Common in over 50 years and would have a significant impact on the character of the common
- The large mass elevation to the south would make the green corner of Timbercroft Lane/Mountbatten close feel more built in
- Front doors are not in common with the conservation area
- The materials are not in keeping with the conservation area

Officer comment: These impacts are assessed within the design and heritage section below in the report

- The public house is a community asset and should be retained.
- The loss of the public house would be to the detriment of the local community
- The public house can be a viable business in the future with the correct rebranding
- The lease tenancy structure utilised by Punch Taverns does not allow for the public house to be financially viable and a freehold pub operation would thrive at the site.
- The success of nearby businesses such as the Slade Café and the Plumtree suggest that a revitalised public house could thrive at the site
- The pub is not being marketed at favourable terms with pubs being marketed closer to Central London at more favourable terms
- There is no reason why the public house cannot serve food to its customers given the size of its kitchen

Officer comment: These impacts are assessed within the principle of development section below in the report

- The proposed development would result in a loss of sunlight
- The proposed development would sit too closely to the residential units at Flora Mews.

Officer comment: These impacts are assessed within the impact on neighbour amenity section below in the report

- Query raised with regard to the retention of the existing access gate from Timbercrofe Lane to Flora Mews

Officer comment: The floor plans appear to show a small gate where the existing gate to Flora Mews stands off Timbercroft Lane however this not shown on the elevations. Had this application been recommended for approval clarification on this matter would have been sought from the applicant.

- Cycle parking to the rear is insufficient

Officer comment: This is assessed within the cycle parking section below in the report.

Six letters of support were received including from the existing pub landlord who stated that over the past sixteen years trade at the pub has been slowly declining and running at a loss which was exacerbated by the pandemic. It was also stated that the pub is in extremely poor repair including the kitchen area which suffers from a roof leak and is no longer fit for purpose and has pushed the pub to trade at reduced hours.

Other letters of support stated that the closure of the pub is supported for the following reasons:

- The pub is run down and financially struggling
- Other more suitable venues for socialising for residents at the nearby Slade Café
- The public house is the subject of significant noise nuisance
- Residents impacted by the clientele of the public house in the form of criminal activity emanating from the site
- The redevelopment of the site would provide much needed additional housing within the borough
- The existing public house building is an eyesore and the replacement housing would visual enhance the site

Internal and Statutory Consultation

Transport and Highways:	<p><i>Given the low PTAL, unrestricted on street parking, low level of parking on site and the subsequent terraced housing locally providing limited opportunity for off street parking, it is recommended that an overnight parking survey is sought so that the level of parking stress in the area can be determined to aid assessment.</i></p> <p><i>The survey should be carried out using the methodology used by LB Lambeth although the car spaces should be considered to be 5.5m long not 5m as suggested.</i></p>
Environmental Health:	<p><i>I have reviewed the documents attached and it is evident that this project will maximise the potentials of this site. However, I have worries on the scale of this development in relation to the environment.</i></p>

	<p><i>This development (7 two-storey dwellings) is a big project and would require substantial number of travels for delivery trucks to transport materials to the site and remove debris as well. This is mainly a residential road and limited with parking space, also Mountbatten Close cannot be obstructed for long. I will need assurances from the developer on how they hope to manage this, to minimise possible inconveniences to the residents; perhaps they can advise if all delivery/removal parkings will be within the curtilage of this site.</i></p> <p><i>They may, in their response, include a construction method statement so it can be reviewed at the same time.</i></p>
Occupational Therapists:	No response received.
Waste:	No response received.
Conservation:	<ul style="list-style-type: none"> • <i>7 Timbercroft Lane (The Whoda Thought It PH) is a locally listed building within the Plumstead Common Conservation Area, the boundary of which deliberately deviates to incorporate this building;</i> • <i>The property is a detached two-storey building which possibly dates from the early 19th century. It has a single-storey extension to its south side which dates from 1878;</i> • <i>Historic map evidence indicates that the building was originally flanked by a pair of semi-detached properties to its north, and a terrace of nine properties to its south. The heritage statement submitted includes a photograph of the latter which shows that these were single-storey cottages;</i> • <i>Currently the building occupies a spacious plot and prominent focal position on approach from The Slade;</i> • <i>Although at the boundary of the conservation area, the building makes a positive contribution to its character and appearance;</i> • <i>A previous application (21/1945/F) sought to demolish the 1878 extension and construct 5no. terraced houses immediately adjacent to and incorporating the pub building. This was refused;</i> • <i>It is now proposed to demolish the building fully.</i>

The principle of this is not supported as it is contrary to current local plan policy DH(j);

- *The submitted Heritage Impact Assessment concludes that the existing building has negligible heritage interest. However, this view is challenged: clearly the building was considered to have sufficient heritage value to be included on the local list and there is no evidence to suggest that this has changed. When assessed against the current criteria for local listing the building meet the following:-*
 - *Architectural Significance: the core of the building was built before 1850 and the later 19th century extensions add a further layer of interest;*
 - *Historical significance: the building illustrates an aspect of the area's social history;*
 - *Townscape or Landscape Significance: the building contributes positively to the street scene, providing local distinctiveness and interest;*
 - *Communal or Cultural Significance: the building is a source of local identity and social interaction;*
- *The proposals are for full demolition of the locally listed building and construction of 7no. 3-storey terraced houses;*
- *It is acknowledged that the immediate area comprises predominantly of terraced housing and that the proposed replacement houses have attempted to take this building type and re-interpret it in a more contemporary way. However, the depth of the building footprint; and the stepped design (with a boxy, flat-roofed first floor, and a boxy dormer to the roof) will cause the terrace to be out of scale with the surrounding historic development and overly dominant and disproportionate to the plot;*
- *The proposals will be particularly harmful to the view south along Timbercroft from the junction with Garland Road, where the current locally listed pub*

	<p><i>makes a landmark statement;</i></p> <ul style="list-style-type: none"> <i>The proposed demolition of the locally listed building will not preserve the character of the conservation area (contrary to the Planning (Listed Buildings & Conservation Areas) Act 1990) and will therefore result in harm to its character and appearance. Contrary to NPPF (para.200), no clear and convincing justification for this has been presented.</i> <p><i>As such, the proposals do not comply with the P(LB&CA)Act 1990 nor National (NPPF paras. 189, 197, 199, 200, 202, 203; NPPG (para.018, 019)), London Plan (D3D.11, HC1.C, HC7) or Local Plan policies (DH1, DH3, DH(h), DH(j)) and it is not, therefore, possible to support approval</i></p>
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Other consultation responses:	
South-East London Branch of the Campaign for Real Ale:	<i>“On behalf of the south-east London branch of the Campaign for Real Ale I would like to object to this application on the grounds it would be in breach of local planning policies Policy HC7 of the London Plan (2021) and Policy EA(b) of the Core Strategy (2014), which support the retention of public houses. Marketing of the freehold (successful or otherwise) is simply not relevant when the pub is trading and has 10 years remaining on the current lease.”</i>

Policies and Guidance:

National Planning Policy Framework (NPPF) (2021)

The NPPF was updated on 20th July 2021 relevant chapters are below:

Chapter 5	Delivering a sufficient supply of homes
Chapter 6	Building a strong, competitive economy
Chapter 8	Promoting healthy and safe communities
Chapter 9	Promoting sustainable transport
Chapter 12	Achieving well-designed places
Chapter 15	Conserving and enhancing the natural environment
Chapter 16	Conserving and enhancing the historic environment

Nationally Described Space Standard (2015)

Planning (Listed Buildings and Conservation Areas) Act 1990

The London Plan (2021):

Policy GG2	Making the best use of land
Policy GG4	Delivery homes Londoners need
Policy GG5	Growing a good economy
Policy D1	London's form, character and capacity for growth
Policy D3	Optimising site capacity through the design-led Approach
Policy D4	Delivering good design
Policy D5	Inclusive design
Policy D6	Housing quality standards
Policy D7	Accessible Housing
Policy D14	Noise
Policy H1	Increasing Housing Supply
Policy H10	Housing Size Mix
Policy E2	Providing suitable business space
Policy E4	Land for industry, logistics and services to support London's economic function
Policy HC1	Heritage conservation and growth
Policy HC5	Supporting London's cultural and creative industries
Policy HC7	Protecting public houses
Policy G5	Urban Greening
Policy G7	Trees and woodlands
Policy SI 1	Improving Air Quality
Policy S12	Minimising greenhouse gas emissions
Policy SI5	Water Infrastructure
Policy SI 7	Reducing waste and supporting the circular economy
Policy SI 8	Waste capacity and net waste self-sufficiency
Policy T4	Assessing and mitigating transport impacts
Policy T5	Cycling
Policy T6	Car parking
Policy T6.1	Residential Parking
Policy T6.5	Non-residential disabled persons parking

The Royal Borough of Greenwich Adopted Core Strategy (with Detailed Policies) July 2014:

Policy EA(b)	Pubs
Policy H1	New Housing
Policy H2	Housing Mix
Policy H5	Housing Design
Policy DH1	Design
Policy DH3	Heritage Assets
Policy DH(b)	Protection of Amenity of Adjacent Occupiers
Policy DH(h)	Conservation Areas
Policy DH(j)	Locally Listed Buildings
Policy DH(l)	Areas of Special Character
Policy E(a)	Pollution
Policy OS(f)	Biodiversity
Policy IM1	Infrastructure

Policy IM4	Sustainable Travel
Policy IM(b)	Walking and Cycling
Policy IM(c)	Parking Standards

Supplementary Planning Guidance/Documents:

Nationally Described Space Standard (2015)
 Mayor's Housing SPG (2016)
 RBG CIL Charging Schedule (2015)
 New Developments Guidance Notes for the storage and collection of waste and recycling materials for the Royal Borough of Greenwich (2018)
 Residential Extensions, Basements and Conversions Guidance SPD (2018)
 Plumstead Common Character Appraisal (2010)
 Plumstead Common Management Strategy (2010)

Planning Considerations:

Principle of Development _

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.

Loss of Public House

The NPPF (2021) states that there are three dimensions to sustainable development: economic, social, and environmental. These dimensions give rise to the need for the planning system to perform a number of roles, including a social role - supporting strong, vibrant and healthy communities, by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

Policy HC7 of the London Plan (2021) (LP) states that applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.

Policy EA(b) of the Core Strategy (2014) seeks the retention of pubs that have a community role and will resist the change of use or demolition except where continued use as a pub is no longer economically viable and where evidence of 2 years of marketing demonstrates that it is not reasonably capable of being made viable. There is a presumption to protect public houses within the borough and the council would welcome refurbishments to improve its viability. Furthermore, Policy EA(b) requires evidence that that a pub does not provide an important community function, then alternative uses of the site will be acceptable.

The application seeks to demolish all buildings on the site for residential development which would result in the loss of the Public House in its entirety. It is noted that application 21/1945/F sought to retain the public house however with a 41% reduction in floorspace including the commercial kitchen. This loss of commercial pub floorspace formed part of the reason for refusal for 21/1945/F given insufficient information had been provided to confirm that the retained public house would continue to be commercially viable in its reduced form.

This application has been accompanied by a viability assessment prepared by Savills in August 2021 in order to demonstrate that the existing public house as it stands is no longer a commercially viable business and no longer provides an important community function.

The viability assessment states that the Who'd a Thought it contains a very small bar with a limited commercial kitchen and a capacity for 30-35 covers indoors and a further 50 covers within the beer garden. The public house is also said to be in a poor state of repair and is not considered economically viable to fund its refurbishment. It is also noted that the Who'd a Thought it, as a wet led public house with limited kitchen facilities as struggled more than most since the pandemic given a change in public trends which increasingly sees people staying at home as opposed to going out for drinks which has seen the public house fail to receive the required support from the local population to remain viable.

It is also stated that the limited passing trade and footfall as well as the competition from other public houses which are better located to cater for the local population and passing trade coupled with the significant refurbishment works required to bring the building up to a sufficient standard and the reluctance of potential purchasers to conduct these improvements works due to the local listing of the building and the siting within the conservation area leads to the continued operating of the existing public house at the site being no longer commercially viable.

The viability assessment also includes data indicating that trade on the site in the form of the number of barrels sold has declined by nearly half between 2015/2016 to 2021 and that any refurbishment works would cost in the region of £320,074 which would only see a moderate uplift in sales and profit margins. It is concluded that due to the market conditions and the cost of refurbishment that the Public House is commercially unviable now and in the long term.

Whilst the viability assessment goes some way in justifying the closure of the public house, given this was prepared in August 2021 it is no longer considered recent or relevant to today's market conditions. During August 2021, the Country was emerging from National and Local lockdowns as a result of the covid pandemic whereby marketing conditions for the previous 18 months to that date were extremely difficult for public houses. As such, the submitted viability assessment is insufficient to justify the loss of the public house at the site.

Upon a site visit the public house was open and trading however it is noted from the representations received from neighbours as well as the existing landlord that opening hours are often sporadic due to the poor state of pub which makes regular opening difficult. These ad hoc opening hours are not conducive in supporting a successful public house at the site. However, does show that it is still in use.

Officers also see no reason as to why food cannot continue to be served from the site which would significantly enhance the viability of the public house to continue to operate. As shown in figure one below, food used to be served from the site and whilst competition from other pubs and cafes in the area is given as a reason as to why this no longer offered this is not considered a valid reason. Considering the applicant has stated many times within the submissions that a wet-led pub is no longer viable, the decision not to offer food from the site is difficult to understand.

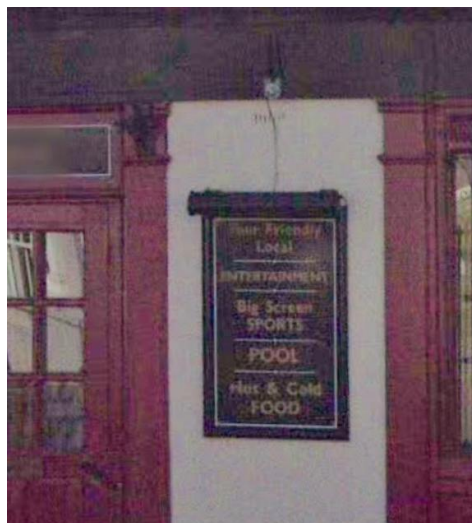


Figure 1 – Sign indicating that hot food used to be served from the site.

Given the scale of the site which consists of a fairly substantial plot, the site could be partially redeveloped for residential use whilst also retaining the public house in its entirety or with a very minor reduction in commercial floorspace. Application 21/1945/F sought to retain the public house on the site with a 41% reduction in floorspace which was not considered to allow for a viable public house to operate from the site.

It is not considered that the applicant has fully explored all options on the site which would seek to retain the public house in a much-improved form which would be a preferable option given the importance the public house could play within the community in the future.

Furthermore, paragraph 4.2.33 of Policy EA(b) states that where pubs are no longer

economically viable or do not provide an important community function, alternative uses of the site will be acceptable. It is not considered that the applicant has considered any other options that would retain community space at the site if the public house is no longer viable which would be a more favourable option for the council to support should it be adequately demonstrated that the public house is no longer commercially viable.

The applicant has stated that the site has been on the open market continuously for several years and has been evaluated at being £1.2m. The site is being marketed by AG&G who operate at every level of the British licensed leisure industry and are specialists in the sale of pubs, bars and restaurants.

The public house was originally marketed from the end of 2011 until at least 2015 via South East London Estate Ltd with an asking price of £1.2m for the freehold. It has then been marketed continually since 2017 by AG&G at the same figure.

It is noted that Punch Taverns currently have a leasehold on the site until 2033 and sub-let it to an independent pub operator on a tied lease agreement. Given the public house is still operational and has a ten years remaining on its current lease, marketing evidence of the freehold of the site is of little relevance in this instance. The marketing evidence centres solely around the selling of the property with little mention of the existing public house operating from the site.

Limited details of the nature and extent of the marketing undertaken has been submitted. No details regarding how the public house was advertised in the form of for sale boards outside the property or whether mass email out marketing was conducted. Moreover, no details of the level of interest generated by the marketing campaign has been provided with regard to how many offers were made, enquiries or site visits. AG&G also do not have a record of this information due to the historic paper file on the property being destroyed.

It is noted that no reduction in price has been made throughout the marketing period approaching eleven years. The site is still on the AG&G website as being for sale for £1.2m. As such, it is not considered that it has been reasonably demonstrated that the public house has been marketed at fair terms particularly given no information has been provided as to how much interest in the pub was generated as a result of this marketing. After a significant period of marketing with limited interest it would be expected that the asking price was lowered in order to generate additional enquiries. Whilst the applicant has stated that the site has been independently valued at £1.2m, no evidence of this has been submitted.

It is therefore considered that insufficient evidence has been submitted that reasonable attempts have been made to actively market the site as a pub for two years as is required by Policy Ea(b) of the CS (2014).

Moreover, having regard to the submitted information pertaining to the poor state of

the building which is estimated to require repair and refurbishment works in the region of £321,000 as well as the representation received from the landlord of sixteen years who stated that the building is in need of major report including the roof which often leaks water into the bar and kitchen when it rains and prohibits the pub from opening regularly it is not considered that Policy HC7 of the London Plan (2021) has been adhered to.

Supporting paragraph 7.7.7 of Policy HC7 states that pubs should be marketed for a period of 24 months in a condition that allows the property to continue functioning as a pub. By the current landlords admission and the contents of the viability assessment, it is not considered that the state of the building is in the best possible condition for the site to continue operating as a viable business that would be attractive to potential purchasers.

With regard to the loss of an employment generating use for a non-employment use and Policy EA(a) of the CS, given the modest nature of the employment generated by the existing public house which is more than likely largely part-time employment, Policy EA(a) is not applicable in this instance.

In conclusion, given the viability assessment is considered to be out of date and not relevant to today's marketing conditions and the deficiencies within the marketing report it is not considered that authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future has been submitted and the loss of the public house which is considered a vital social community asset has not been justified.

Provision of additional housing (Use Class C3)

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 supports the delivery of sufficient homes to meet current housing needs.

In this respect Policy GG4 of the London Plan (2021) (LP) seeks to ensure that more homes are delivered. To assist in this Policy H1 of the LP highlights the pressing need for more homes in London and outlines for each local authority their 10-year targets for net housing completions. The Royal Borough's target is to deliver 28,240 dwellings. In addition to this, Policy H2 of the LP 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 3010 dwellings.

Policy H1 of the LP clearly sets out the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.

Policy H2 of the LP states that boroughs should pro-actively support well-designed

new homes on small sites through both planning decisions and small sites.

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.

The current proposal would provide 7 new dwellings which would contribute to the targets above. However, for the reasons given in regards to the loss of the public house, this cannot be supported in this current application.

Conclusion

Whilst residential development of the site is acceptable in principle, insufficient information has been submitted demonstrating that the existing public house on the site is no longer commercially viable and that the requisite level of fair marketing has been undertaken to justify the loss of the Public House which is considered to be an important social community asset and the loss of which would be to the detriment of the local area contrary to policies HC7 of the London Plan (2021) and Policy EA(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Housing Mix

Policy H10 of the London Plan seeks to ensure that new developments offer a range of housing choices in terms of mix of housing sizes and types, and regard should be had to the needs of particular communities with large families and the range of needs of different age groups.

Policy H2 of the Core Strategy states that a mix of housing types and sizes will be required in all developments including conversions and should contain a proportion of 3, 4 and 4+ bedroom units.

The proposal would provide seven 3-bedroom dwellinghouses which would all be suitable for family occupation, this would be an acceptable housing mix which would serve housing need within the Borough.

Design and Impact on Designated Heritage Assets

The National Planning Policy Framework (NPPF) (2021) 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 126). Paragraph 130 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.

Paragraph 134 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.

Policy D3 of the LP states that development proposals should make the best use of land by flowing a design-led approach that optimises the capacity of sites. Furthermore, development proposals should enhance 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. Finally, development should respond to the existing character of a place, be of a high quality and achieve safe, secure and inclusive environments. Policy D4 of the London Plan sets out the tools available to Local Planning Authorities to achieve the aims of Policy D3, but it is acknowledged that the use of these tools needs to be proportionate to the scale of development proposed.

Policy DH1 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. Policy H5 of the CS states that 'new residential development

will be expected to achieve a high quality of housing design and an integrated environment. The Royal Borough will take into account the key relationship between the character of the area, site location and housing densities’.

Paragraph 199 of the NPPF (July 2021) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). Paragraph 200 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Section 72 of the Listed Buildings and Conservation Areas Act 1990 states that local authorities must pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

This same requirement is in place at the local level, through Policies HC1 and D3 of the London Plan (March 2021) and Policies DH3 and DH(h) of the Core Strategy.

Policy DH(j) states that in considering proposals affecting buildings on the Local List of Buildings of Architectural or Historic Interest, substantial weight will be given to protecting and conserving the particular characteristics that account for their designation. Consequently, proposals for the demolition or unsympathetic alteration of locally listed buildings will be strongly discouraged.

The host building is locally listed with the following listing description:

‘Possibly early 19th Century with later ground floor extension to front added around 1878. 2-storey brick building, with front rendered and painted and having a projecting ground floor. Slated roof with gable ends, modern single storey parapeted flat roof extensions.’

The site is a Locally Listed building also lies within the Plumstead Common Conservation Area and the site is identified in the Plumstead Common Character Appraisal (2010) as a building which makes a positive contribution to the special character of the conservation area within character area 2: The Slade. This part of the Conservation Area is characterised by homogenous mid-19th century 2-storey terraced housing with dual pitched roofs, generally setback from the road and with modest rear gardens and these terraces are generally and standalone buildings are well spaced interspersed with greenery.

The previous application on the site (ref: 21/1945/F) sought to partially demolish the locally listed building as opposed to the full demolition brought forward under this application. This was refused by reason of its unacceptable impact on the Plumstead Common Conservation Area and its failure to preserve the character and appearance of the locally listed building.

Principle of demolition

The host building is locally listed with the following listing description:

'Possibly early 19th Century with later ground floor extension to front added around 1878. 2-storey brick building, with front rendered and painted and having a projecting ground floor. Slated roof with gable ends, modern single storey parapeted flat roof extensions

It is sought to demolish all the buildings on the site in their entirety. The existing public house building is considered to make a strong positive contribution to the setting of Plumstead Common Conservation Area and this is noted within the conservation area character appraisal, the significance of the building is derived from its historic, aesthetic and communal values as it contributes to the understanding of the development of the area, providing a tangible link with the past and the communities which it has served through its continued use as a public house. Aesthetically, with its simple pitched roof form and set-back from the road, it is typical of rural pubs, which further reflects the historic roots of the area.

The existing building occupies a prominent position on a wide corner on Timbercroft Lane and is a focal point in views both from within the conservation area and into the conservation area and it is noted that the boundary of the Plumstead Common Conservation Area deviates to include the site which is further indication of the heritage significance of the site.

The Council's Conservation Officer has been consulted and has raised objection to the loss of the locally listed building and disagrees with much of the heritage impact assessment which concluded that the building has a negligible heritage interest. This view is challenged given the building has been added to the local list by reason of it having a sufficient heritage value with no clear evidence provided to show that this has changed since its local listing. Policy HC7 of the London Plan is clear in stating that pubs with a clear heritage value should be protected.

Whilst the heritage statement submitted as part of this application prepared by John Stebbing architects concludes that the:

"building has a negligible heritage interest and its loss is considered to have a neutral impact on the conservation area.."

The previous application at the site which sought to retain part of the locally listed building with only partial demolition stated within the submitted heritage statement also prepared by John Stebbing architects concluded that the building contributes to the character of the conservation area and has a communal heritage value relevant to its locality whilst also stating that the plans to retain the public house would preserve and enhance the character and special interest of the wider conservation

area and heritage assets setting.

It is unclear as to why the applicant has u-turned on this matter or what circumstances has changed for the demolition of the locally listed building to now be considered acceptable.

Insufficient information has also been submitted as to why the locally listed building cannot be retained and positively adapted and re-used. Whilst it may be demonstrated that the Public House is no longer viable, given the positive contribution the building makes to the area and its historical significance, illustrated by its local listing, efforts should be made to retain building for another purpose or robust justification as to why it cannot be retained provided.

As such, the demolition of the locally listed building would not be supported given its historic importance within the streetscene and the positive contribution it makes to the Plumstead Common Conservation Area generally. It is not considered that robust justification has been provided for its loss and the harm to the visual amenity of the area derived from its loss would not be outweighed by any of the benefits of the scheme.

By reason of insufficient evidence submitted to demonstrate that the Locally Listed building could not be retained and the building effectively adapted and re-used, the demolition of the building has therefore not been sufficiently justified. The proposed development would involve the demolition of a Locally Listed Building, a key positive building within the Plumstead Common Conservation Area, which would cause substantial harm to these heritage assets. As such, the proposal is contrary to the NPPF, Planning (Listed Buildings and Conservation Areas) Act 1990, policies D3 and HC1 of the London Plan (2021), policies DH1, DH3, DH(h) and DH(f) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), Plumstead Common character appraisal (2010) and Plumstead Common management strategy (2010).

New build element

As stated above the existing building occupies a prominent position within the Plumstead Common Conservation Area and the streetscene generally, the same can be said for the proposed new-built element of the development which would be highly viable from Timbercroft Road and the rear of the proposed dwellinghouses highly visible from Mountbatten Close and across the open ground as Timbercroft Lane curves round to the east.

The proposal seeks to provide 7 terrace dwellinghouses which would be two-storeys and identically proportioned in terms of height, width and roof form. This would extend the entire width of the plot extending from the north boundary adjacent to

Flora Mews to hard up against the pavement on Mountbatten Close. As a result the development would appear cramped within its plot and would not accord with the prevailing spatial pattern of the development which maintains a relatively open urban grain with properties separated by open spaces of greenery.

The new dwellings would also extend significantly to the rear and would have an overall footprint significantly larger than any of the adjacent built form. This excessive footprint at both ground and first floor would be highly conspicuous from the public realm when viewed from Mountbatten Close to the south of the site.

Whilst it is acknowledged that the immediate area comprises predominantly of terraced housing and that proposed replacement houses have attempted to take this building type and re-interpret it in a more contemporary way, the excessive depth of the new dwellings coupled with the incongruous rear façade which includes large box dormers and a flat roof box style first floor rear extension which would present a stepped rear façade which would be highly visible from the approach to Timbercroft Lane from Mountbatten Close.

The proposed dormers are large and disproportionate to the roofs in which they sit and cannot be described as small in scale. These would appear as overly dominant within the rear façade and give rise to a top heavy rear elevation. The flat roof rear extension would also be inappropriate in this setting and would give rise to an unsightly flat roof from within the public realm. The presence of rear dormers is noted to the north east of the site within Flora Mews is noted however these are not as visually prominent within the public realm and cannot be used to justify the significant harm caused by the rear dormers brought forwards under this application.

The materials used would be acceptable and would provide a contemporary appearance whilst being in keeping with the surrounding built form. The front rooflights, although uncommon with the immediate vicinity would not be problematic given their minor scale.

Overall, the significant depth and incongruous stepped rear façade of the proposed development would be out of scale with the surrounding historic development and would be overly dominant and disproportionate within the plot. As such, the proposed development would fail to complement or enhance the existing building or the character and appearance of the wider area.

The proposal would amount to less than substantial harm to the Plumstead Common Conservation Area and would result in the loss of a locally listed host building and existing public house, paragraphs 202 and 203 of the NPPF (July 2021) requires such harm to be weighed against the public benefits of the proposal. In this instance the benefits of the proposal include provision of 7 dwellings, however these benefits would not outweigh the harm identified above as it is noted that the proposal would not make an appreciable contribution to the housing stock within the

Borough.

Impact on the surrounding Area of Special Character

Policy DH(l) of the Core Strategy states that within Areas of Special Character defined on the Proposals Map, special consideration will be given to the safeguarding, restoration and enhancement of character, scale and quality of open spaces and associated buildings. Skylines and distant views both to and from the Areas of Special Character will be protected.

The proposal lies within an Area of Special Character (ASC) surrounding Plumstead Common and its margins. While it is stated above that the development would not respect the prevailing open spatial pattern of the development in the area, the character of the ASC is characterised principally by Plumstead Common and the development is limited in height and set back from this open space on the margins of the ASC and would not have a significant impact on the ASC.

Summary

This proposal is considered unacceptable for the following reasons in regards to Design and Impact on Heritage Assets:

By reason of insufficient evidence submitted to demonstrate that the Locally Listed building could not be retained and the building effectively adapted and re-used, the demolition of the building has therefore not been sufficiently justified. The proposed development would involve the demolition of a Locally Listed Building, a key positive building within the Plumstead Common Conservation Area, which would cause substantial harm to these heritage assets. As such, the proposal is contrary to the NPPF, Planning (Listed Buildings and Conservation Areas) Act 1990, policies D3 and HC1 of the London Plan (2021), policies DH1, DH3, DH(h) and DH(j) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), Plumstead Common character appraisal (2010) and Plumstead Common management strategy (2010).

By reason of its excessive footprint and incongruous rear façade, the proposed development would fail to complement or enhance the appearance of the streetscene and would result in significant harm to the character and setting of the Plumstead Common Conservation area. Consequently, the proposed development would be contrary to Policies D3, D4, HC1 and HC7 of the London Plan (2021), Policies DH1, DH3, DH(h) and DH(j) of the Core Strategy and Detailed Policies (2014), the Planning (Listed Buildings and Conservation Areas) Act 1990, Plumstead Common character appraisal (2010), Plumstead Common management strategy (2010) and the NPPF (2021).

Trees

Policy G5 of the LP states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy G7 of the LP states 'Development proposals should ensure that, wherever possible, existing trees of value are retained'.

CS Policy OS(f) requires development proposals to take account of ecological factors including impacts on trees and biodiversity.

The site forms part of an Area of Special Character surrounding Plumstead Common and its margins and is generally characterised by greenery and open spacing. The site contains several mature trees along the eastern boundary of the site and used to comprise of a mature tree on the southern boundary which appears to have been removed since 2021 given the loss of this tree was sited as a reason for refusal for the previous application on the site due to the positive contribution this tree made to the streetscene. It should be noted that no mention of this tree is made within the submissions.

By virtue of their siting in a conservation area these trees are protected and the loss of this tree, which appeared to be a maple tree, is regrettable. It is also noted that no record of consent for removal or works to this tree exists and any unauthorised damage to or removal of the tree constitutes a criminal offence.

The trees along the eastern boundary of the site appear to be retained however a tree within the rear of the site will need to be felled to make way for the proposed development. As shown in figure two below there appears to be some vegetation along the southern boundary and it is unclear as to what this comprises of or how this would be impacted upon as a result of the proposed development.



Figure 2 - Vegetation along the southern boundary

Whilst the Design and Access Statement make references to tree planting to the front of the site which would be welcomed, no mention is afforded to the existing trees on the site which are protected and are considered to make a positive contribution to the setting of the Plumstead Common Conservation area. It is also noted that no Arboricultural Impact Assessment has been submitted to demonstrate the impact of the development on the trees on the site or justify the loss of any trees as a result of the proposed development.

In light of the above, due to insufficient information being submitted it is considered that the development is considered could result in the loss of a tree to the rear of the site and may impact on trees along the southern boundary of the site which would harm the setting of the Plumstead Common Conservation Area as well as the streetscene generally and insufficient justification for the loss of these tree has been provided, contrary to Policy G7 of the London Plan (2021) and Policies OS(f), DH1, DH3 and DH(h) of the Core Strategy (2014).

Impact on Neighbour Amenity

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.

Additionally, Policy E(a) of the CS states that proposals which have an adverse effect on the amenity of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of light, vibrations, odours, fumes, dust, water and soil pollutants or grit, will be refused. This is supported by policy D14 of the London Plan.

The proposed development would be set immediately adjacent to the development originally approved under application 18/2773/F within Flora Mews to the north east of the site in the form of large two-storey townhouses. These would be at a greater height to the proposed development and would extend significantly further beyond the rear building line of the proposed new dwellings and as a result the proposal would have a negligible impact on the living conditions of the occupants of the nearest most unit with regard to loss of daylight/sunlight, loss of outlook or increase in sense of enclosure impacts.

It is acknowledged that there are south facing windows within the flank elevation of Flora Mews which may be impacted upon however on a site visit however the ground floor window serving a living room is already somewhat compromised by the proximity to the brick wall boundary and doesn't provide the principal source of light to the living room regardless. At first floor level, the flank elevation is obscured glazed and serves a bathroom. As such, these windows would not be unacceptably impacted upon to warrant a refusal on these grounds.

The proposed development would be well setback from all other surrounding residential properties and would not result in a loss of outlook or natural light for these properties. The development would feature first floor and rear dormer windows which would overlook properties rear of the site along Mountbatten Close however the degree of separation and angle of orientation would preserve the privacy of the occupiers of these dwellings and any overlooking would not be out of the ordinary with what you would expect to find in a tight residential setting such as this.

The additional residential occupiers would not result in unacceptable noise nuisance from additional comings and goings as the residential entrance would be on Timbercroft Lane and not near adjoining properties particularly when taking into account the use of the site as a public house which is considered to have a significantly greater impact with regard to noise and disturbance than the proposed residential use.

A construction management plan could be secured by condition to ensure that future occupants are not disturbed during implementation.

Quality of Accommodation

Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies

(adopted 30th July 2014), requires that new residential development, redevelopment or conversions to provide a high quality of housing design and environment. In this regard the Nationally Described Space Standards and Policy D6 of the London Plan set out specific space standards that proposed residential accommodation should comply with.

Flat	Flat Type	Nationally Described and London Plan Space Standard's (m²)	Proposed GIA (m²)
Unit 1	3 storey 3 bed 5 person	99	108
Unit 2	3 storey 3 bed 5 person	99	108
Unit 3	3 storey 3 bed 5 person	99	108
Unit 4	3 storey 3 bed 5 person	99	108
Unit 5	3 storey 3 bed 5 person	99	108
Unit 6	3 storey 3 bed 5 person	99	108
Unit 7	3 storey 3 bed 5 person	99	108

As can be seen from the table above all of the units meet the minimum gross internal area (GIA) requirements of the London Plan. The bedrooms would comply with the internal area standards of the Nationally Described Space Standards (2015) of a minimum internal area of 7.5sqm and 11.5sqm for single and double bedrooms respectively.

2.5sqm of built in storage space is required to be provided for units of this type which is easily met with storage space provided across all three floors exceeding these minimum requirements.

Floor to ceiling heights

It is noted that the Technical Housing Standards states that the minimum floor-to-ceiling height is 2.3m for at least 75% of the GIA. Standard 31 of the Mayor's Housing SPG however 'strongly encourages' a minimum ceiling height of 2.5m for at

least 75% of the GIA. However, the recently adopted LP sets out in Policy D6 that new dwellings should ensure that units have a minimum floor to ceiling height of 2.5m across 75% of the GIA.

The proposed sectional drawings indicate that the site exhibits floor to ceiling heights of at least 2.4m provided throughout each unit.

This would be compliant with the above requirement.

Outdoor space provision

The Mayor's Housing SPG also prescribes standards for outdoor space as follows:

- Standard 26 – Minimum 5m² private outdoor space for 1-2 person dwellings and 1m² additional outdoor space per additional occupant.
- Standard 27 – Minimum 1.5m width and depth for all private outdoor spaces.

The Council has a high standard for rear amenity space for family sized dwellings as set out under policy H5 of the Council's Core Strategy and paragraph 4.1.31 it states that 'Dwellings with direct access to private gardens are the most appropriate form of provision for families with children. As a guide, a minimum garden area of 50m² should be provided in houses with up to three bedrooms with an additional 15m² provided for each additional bedroom'.

Examining the proposed plans, an area of approximately 42.5qm to the rear of each dwelling is proposed for each unit with further amenity space to the front of the site. Whilst this falls short of the requirements within the Core Strategy given the proposed unit would overprovide internal space and the proximity to Plumstead Common it is considered that 42.5sqm of rear amenity space would be acceptable in this instance.

The proposal with regard to the outdoor space provision is acceptable in this instance.

Bathroom Provision

The Technical Housing Standards require two and three storey dwellings to account for one bathroom and one *additional* WC/shower room.

The proposed development would be compliant with this requirement, showing the provision of a WC on the ground floor and bathroom facilities on the first floor.

Outlook, light and privacy

Other standards within the Mayor's Housing SPG focus on the internal amenity of future residents. Standard 28 requires that habitable rooms benefit from an adequate level of privacy, Standard 29 promotes dual aspect dwellings in order to optimise daylight, sunlight, natural ventilation, thermal control, pollution mitigation, views and internal flexibility/adaptability, and Standard 32 requires that at least one habitable room (preferably kitchen, dining and living spaces) should receive direct sunlight for part of the day.

Policy D6 states that development should maximise the provision of dual aspect dwellings and avoid the provision of single aspect dwellings and that new dwelling should be provided with sufficient daylight and sunlight.

All dwellings would be dual aspect. All habitable rooms would receive direct sunlight for part of the day and would receive good outlook. The dwelling would also receive a good degree of privacy with none of windows unacceptable overlooked.

Conclusions

The proposal is considered to provide a suitable standard of accommodation for future occupiers. Consequently, the proposed development would be in accordance with Policy D6 of the London Plan (2021), Policies H5 and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) and the Technical Housing Standards – Nationally Described Space Standard (2015), the London Housing SPG (2016).

Inclusive Design

Policy D5 of the LP requires developments to achieve the highest standards of accessible and inclusive design.

Policy D7 of the LP also sets out that all new dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

CS Policy H5 supports the principles of inclusive living environment and Policy DH1 also states that all new developments should achieve accessible and inclusive environments. The proposed new dwellings at the application site are therefore expected to comply with Part M4(2) of the approved Building Regulations.

Standard 11 of the Mayors Housing SPG (2016) further states that:

"90 per cent of new build housing should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation requirement M4(3) 'wheelchair user dwellings'."

The Councils Occupational Therapists team have not provided

The proposal should comply with approved document M4(2), the Councils Occupational Therapists team have not provided any comments. Had this application been recommended for a approval, a full assessment of the plans would have been sought from the occupational therapists prior to any decision being issued.

Transport and Highways:

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. Policy T2 also states that development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving.

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.

Policy T6.1 further sets out that maximum parking provision for residential development should be in accordance with Table 10.3. For a residential development of this size within a PTAL 2 area, the London Plan sets out that each new dwelling should provide 0.5 car parking spaces. As such, the maximum car parking provision for the entire development should be 3.5 spaces.

The proposal brings forward a single disabled car parking space serving unit one. The surrounding roads contain unrestricted street parking and on a site visit officers observed limited car parking availability, unsurprising given the terraced nature of the housing along Timbercroft Lane.

The Councils highways officer has been consulted and has stated that a car parking survey is conducted in order to demonstrate that the proposed development would not significantly exacerbate the parking stress in the area.

Given seven new family sized dwellings are proposed and the low PTAL rating of the area concern is raised that this would lead to a considerable increase in car parking stress within the surrounding streets and the single car parking space provided for the entire development would be an under provision of car parking in the absence of evidence demonstrating that this could be easily contained within the existing surrounding car parking network.

The proposed on-site car parking amounts to an under provision of car parking contrary to the maximum parking standards as set out in Table 10.3 of the London Plan (2021) and would therefore undermine strategic efforts to reduce private car ownership and promote more sustainable forms of transport, contrary to Policies T6 and T6.1 of the London Plan (2021) and Policies IM4 and IM(c) of the Core Strategy

(2021).

Insufficient information has been provided to demonstrate that the proposed development would not have an unacceptable impact on car parking stress within the area contrary to Policies T6 and T6.1 of the London Plan (2021) and Policies IM4 and IM(c) of the Core Strategy (2021).

Cycle Storage:

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.

The cycle provision should be in line with that set out in Table 10.2 and the proposed development would need to provide 14 residential cycle parking spaces, two for each new dwelling.

Two cycle parking spaces would be provided for each dwelling sited within the rear garden. This would be safe and secure location and an acceptable provision per new dwelling.

Refuse and recycling

Core Strategy Policy H5 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 London Plan Policy SI 8.

3x240L bins are provided for each new dwelling within the front garden. Whilst the waste officer has not provided any comments, this would be an acceptable level of provision and location of storage.

Had this application been recommended for approval, a condition would have been attached to the decision notice require details of the method of enclosure for the refuse given this would be sited in a prominent position within the streetscene.

Sustainability

Policy DH1 of the CS sets out Council's expectations for all development to maximise energy conservation and minimise future carbon dioxide emissions and

mitigate climate change, and to comply with LP Policy S12 and Policy E1 of the CS.

The Greener Greenwich Supplementary Planning Document provides guidance on how new development in the borough should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction.

LP Policy SI5 requires development to minimise the use of mains water by incorporating water saving measures and equipment and designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day. This is captured under the Greener Greenwich Supplementary Planning Document (SPD).

Conditions would be recommended on any approval to ensure that the above policies and recommendations are adhered to. The proposed development is therefore considered to be in accordance with Policies S12 and S15 of the London Plan (2021) and Policies DH1 and E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

that the achievement of sustainability targets should form a condition of any approval.

Five Year Housing Land Supply (5YHLS):

At present the Council is able to demonstrate a housing land supply of 3.1 years. This means that Royal Greenwich is not meeting the NPPF requirement for a five-year housing land supply (5YHLS). In the circumstances where the Council is unable to demonstrate a 5YHLS, under footnote 8 of the NPPF, the presumption in favour of sustainable development in accordance with paragraph 11d of the Framework applies – ‘the tilted balance’. ‘tilted balance’ refers to the presumption in paragraph 11 (d) ii of the NPPF that, where the presumption applies, planning permission should be granted unless there are “adverse impacts which would significantly and demonstrably outweigh its benefits, when assessed against the policies of the Framework as a whole.

In this instance it is considered that the harm identified in the report is namely:

- Insufficient information has been submitted demonstrating that the existing public house on the site is no longer commercially viable and that the requisite level of fair marketing has been undertaken to justify the loss of the Public House which is considered to be an important social community asset and the loss of which would be to the detriment of the local area contrary to policies HC7 of the London Plan (2021) and Policy EA(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
- By reason of insufficient evidence submitted to demonstrate that the Locally Listed building could not be retained and the building effectively adapted and re-used, the demolition of the building has therefore not been sufficiently justified. The proposed development would involve the demolition of a Locally Listed

Building, a key positive building within the Plumstead Common Conservation Area, which would cause substantial harm to these heritage assets. As such, the proposal is contrary to the NPPF, Planning (Listed Buildings and Conservation Areas) Act 1990, policies D3 and HC1 of the London Plan (2021), policies DH1, DH3, DH(h) and DH(j) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), Plumstead Common character appraisal (2010) and Plumstead Common management strategy (2010).

- By reason of its excessive footprint and incongruous rear façade, the proposed development would fail to complement or enhance the appearance of the streetscene and would result in significant harm to the character and setting of the Plumstead Common Conservation area. Consequently, the proposed development would be contrary to Policies D3, D4, HC1 and HC7 of the London Plan (2021), Policies DH1, DH3, DH(h) and DH(j) of the Core Strategy and Detailed Policies (2014), the Planning (Listed Buildings and Conservation Areas) Act 1990, Plumstead Common character appraisal (2010), Plumstead Common management strategy (2010) and the NPPF (2021).
- Insufficient information has been provided to justify the loss of trees on the site which would harm the setting of the Plumstead Common Conservation Area as well as the streetscene generally contrary to Policies G5 and G7 of the London Plan (2021) and Policies OS(f), DH1, DH3 and DH(h) of the Core Strategy (2014).
- Insufficient information has been provided to demonstrate that the proposed development would not have an unacceptable impact on car parking stress within the area contrary to Policies T6 and T6.1 of the London Plan (2021) and Policies IM4 and IM(c) of the Core Strategy (2021).

In this instance, it is considered that the above harm significantly and demonstrably outweigh the benefits of the scheme, when assessed against the Framework, in terms of delivering new homes.

Other considerations:

No other considerations.

Recommendation:

That planning permission is **REFUSED** for the reasons on the decision notice.