
Planning, Design and Access Statement

Address: Building adjacent 53 Macoma Road,
Plumstead, London, SE18 2QJ

Proposals: Retrospective change of use of the building from a former storage and distribution unit (Use Class B8), to a one bedroom, 1 person dwellinghouse (Use Class C3) along with associated external works.

Applicant: LSH Developments Ltd



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12 April 2021

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1.0 INTRODUCTION AND BACKGROUND

- 1.1 The Planning, Design and Access Statement accompanies a full planning application for a Retrospective change of use of the building from a former storage and distribution unit (Use Class B8), to a one bedroom, 1 person dwellinghouse (Use Class C3) along with associated external works.
- 1.2 The Statement has been written to meet the requirements of Article 2 of the Town and Country Planning (Development Management Procedure (England) Order 2015.

2.0 THE SITE & SURROUNDING AREA

- 2.1 The site is located on the north side of Macoma Road adjacent to a terrace property known as No. 53 Macoma Road. The building in question is a two storey former coach house, finished in London stock brick with attractive and unique features such as a decorative sloping brick coping band at high level and a lintel above the attractively proportioned opening in first floor front elevation, these features are retained and enhanced as part of the conversion scheme the subject of this appeal. The building is set back from Macoma Road resulting in a courtyard area behind a 1.8m high brick wall and gate separating the site from the back edge of the footway.
- 2.2 The site is located in the heart of an established and historic residential area, with residential properties directly to the south, east, west and north of the site. The building the subject of this appeal is located approximately halfway up Shooters Hill, one of the highest points in London. Due to the sloping nature of the land, the roads in the neighbourhood are narrow and windy, with parked cars on both sides of the road. It is challenging for any vehicle, let alone an average family car, to negotiate the historic road layout of this part of London with its uniquely narrow and windy roads. The building was last used by a self employed roofer for storage purposes (storage of ladders and other ancillary equipment) way back in 2015. The building has been disused and vacant for approx 6 years. The application site is located within a 2 minute (160 yards) walk to the southern edge of Plumstead Common, a beautiful and expansive public open space linking up with Winn's Common to the east.
- 2.3 The building is not listed, the site is not located in a conservation area, the site is not at risk of flooding (being half way up Shooters Hills) and is not allocated or safeguarded in RBGs Core Strategy or the London Plan for industrial or strategic employment uses. There are no other site constraints and the building and site is otherwise available and deliverable for redevelopment/conversion purposes, subject to the necessary consents.

3.0 SITE HISTORY

- 3.1 There is one official historic planning entry relevant on the site and it relates to a planning application made in 1990 for the Conversion of store to dwelling and extension (planning ref 90/0014/P). This application, according to the Council's records were refused but there are no reasons for refusal available. We do not know the circumstances around this refusal, we do not even know the details of the proposal, as such this refusal should be given limited to zero weight in our opinion due to the significant time lapse (over 30 years) and in light of the clear lack of details around this historic refusal.
- 3.2 In terms of the most recent application, as mentioned above planning application ref 20/2991/F for a Retrospective change of use of the building from a storage and distribution unit (Use Class B8), to a single dwellinghouse (Use Class C3) along with associated external works was refused by RBG on the 5th February 2021 for the following reasons:
1. *By reason of the loss of the existing B8 use with no evidence to justify the loss, the proposal would cause harm to the provision of employment floorspace within the immediate area as well as the wider borough. The proposal would therefore fail to accord with policies 4.1 and 4.4 of the adopted London Plan (2016) and policies EA1 and EA(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies "Core Strategy" (July 2014).*
 2. *By reason of the inadequate floorspace provision, limited floor to ceiling heights and limited outlook available to the ground floor habitable room, it is considered that the development does not provide an acceptable quality of accommodation for existing and future residents. The proposal would therefore fail to be in accordance with Policy 3.5 of the London Plan (2016), Policies H5 and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), the Nationally Described Space Standards (2015) and the Mayor of London Housing SPG (2016).*
- 3.3 The LPA included the following informative on the decision notice:

Positive and Proactive Statement: The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, no pre-application advice was sought before the application was submitted. As the proposal was clearly contrary to the provisions of the Development Plan, it was considered that further discussions would be unnecessary and costly for all parties

4.0 THE PROPOSAL

- 4.1 The proposal the subject of this application remains predominantly retrospective in nature and is for a Retrospective change of use of the building from a former storage and distribution unit (Use Class B8), to a one bedroom, 1 person dwellinghouse (Use Class C3) along with associated external works. Following pre-application discussions with the Council on Thursday 11 March 2021 (and subsequent meeting notes dated Monday 15 March 2021, circulated by Luke Sapiano), and in order to overcome reason for refusal 2, an internal wall is proposed on ground floor to turn the previously proposed 15 square metre bedroom into a 11.5 square metre bedroom large enough to be occupied as a single bedroom - exactly in line with the advice from LPA officers.
- 4.2 To further facilitate the change of use and conversion to residential, the external alterations included the replacement of industrial concertina doors on ground floor with full height and high quality double glazed doors finished in black frames (a double door and a single door). The adjacent areas were then carefully finished in matching London stock brick. The previously boarded up opening in first floor front elevation has been fitted with full height, high quality inward opening double glazed doors behind a Juliet balcony and planters. The lintel above first floor doors has been reintroduced as steel to structurally reinforce the building, and a new lintel is installed on ground floor level above the front door and the set of double doors. The new lintels are finished black to give a nod to the historic appearance of the former coach house and to compliment and blend in with the overall design approach of the conversion scheme and to harmonise with the appearance of the double glazed doors. The LPA raises no objection to the overall design and appearance of the conversion scheme. The former decayed and spray painted gates in the front boundary wall have been replaced with attractive new gates. Two new velux rooflights allowing ample and additional daylight and sunlight into the first floor area have been installed in the sloping roof.
- 4.3 Below and on the following pages are images of part of the front elevation, inside of the unit, and boundary treatment before the conversion works, as well as external and internal images of the building and unit following the conversion works:

Previous situation before conversion works:



The new front elevation and front boundary treatment:

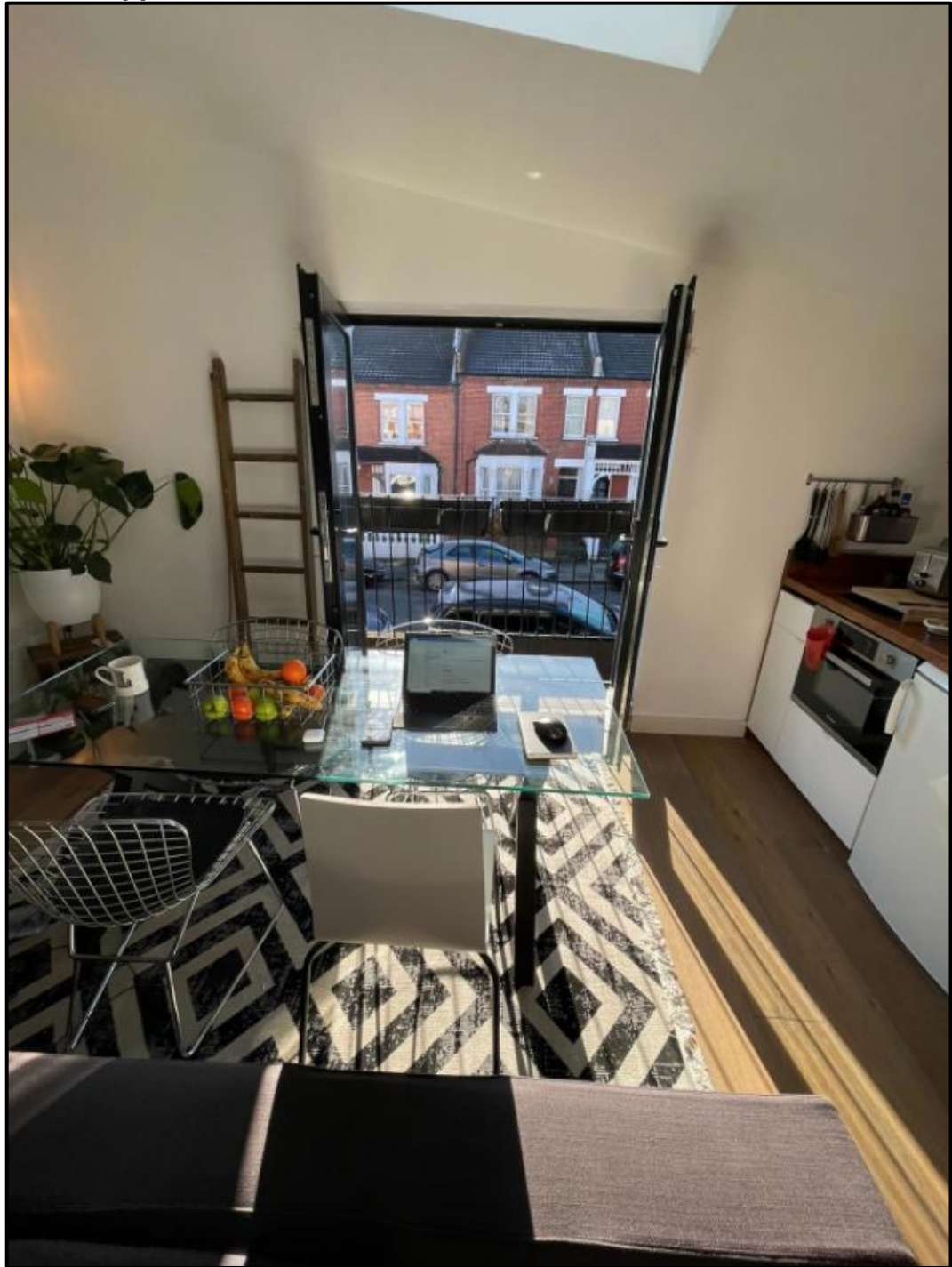


- 4.4 Internally in the ground floor front elevation is the main front door leading to the fully ventilated bedroom and en-suite shower and toilet. The image below illustrates the spacious and open plan layout on ground floor. The built-in staircase situated along the west facing side elevation provides access to the first floor. At first floor level is a bright and airy open plan kitchen, dining and living area with beautiful views of the Victorian terraces opposite. Below are various images of the internal layout of the unit, as well as images showing the views out of the unit from both ground and first floor level, through the south facing glazed doors:

IMPORTANT: Ground floor bedroom with excellent views over the patio to front:



First floor with views through double door looking towards the Victorian terrace opposite Macoma Road



Living/Dining space on first floor, note velux rooflight in top left hand corner of picture



View across first floor living/kitchen/dining area with glazed doors in south facing front elevation, and exposed timber beam and two velux rooflights in clear sight



- 4.5 For the avoidance of doubt and as per the proposed drawings, 1 bedroom, 1 person unit with an en-suite shower room and toilet is proposed. The Gross Internal Area of the 1 bedroom, 1 person unit is 39.16 square metres.

5.0 PREVIOUS ISSUES RAISED BY LPA (as part of previous refusal)

- 5.1 In light of the Councils' reason for refusal and the LPA officer's delegated report, the Applicant considers that the main issues (from LPA perspective) in this case to be:
- Whether the proposal will harm the provision of employment floorspace within the immediate area as well as the wider borough; and
 - Whether the development provides an acceptable quality of accommodation for existing and future residents with specific regard to internal floorspace provision, floor to ceiling heights and outlook from ground floor habitable room (the three matters cited by the LPA as 'issues')

6.0 RELEVANT LEGISLATION AND PLANNING POLICY

- 6.1 This section sets out the legislation and the main national, regional and local policies that need to be considered in the context of the appeal. Below is a summary of these considerations.

2019 National Planning Policy Framework (NPPF)

- 6.2 Paragraph 38 - *Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*
- 6.3 Paragraph 117 - *Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*
- 6.4 Paragraph 118 - *Planning policies and decision should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...*

Local Development Plan

- 6.5 The Planning and Compulsory Purchase Act 2004, Section 38 (6) states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

- 6.6 Considerable weight should therefore be attached to its policies. It will however be demonstrated that, apart from the development plan, that other material planning matters should be given due consideration in this case.
- 6.7 The current up to date statement of the Council's planning policies is contained within the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) as well as relevant policies in the London Plan 2016. For the purpose of this application, these documents together with the NPPF is the statutory plan for the borough and is currently used to determine all planning applications in the borough.
- 6.8 The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) sets out the Council's overall long-term vision for the Borough and must take account of national planning policy guidance and be in general conformity with the NPPF and London Plan.
- 6.9 The Council puts forward the following **London Plan (2016)** (now London Plan 2021) policies in their reasons for refusal:
- 6.10 **Policy 3.5** - Quality and Design of Housing Developments - The Policy states:

Strategic

A - Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

Planning decisions and LDF preparation

B - The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.

C - LDFs should incorporate requirements for accessibility and adaptability, minimum space standards, including those set out in Table 3.3, and water

efficiency. The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process.

D - Development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.

E - The Mayor will provide guidance on implementation of this policy that is relevant to all tenures.

Extract from relevant parts of Table 3.1 (Minimum space standards for new dwellings) of the 2021 London Plan below (exactly the same as previous table 3.3 of 2016 London Plan):

Table 3.1 - Minimum internal space standards for new dwellings*

Type of dwelling		Minimum gross internal floor areas* and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5
4b	5p	90	97	103	3
	6p	99	106	112	3
	7p	108	115	121	3
	8p	117	124	130	3
5b	6p	103	110	116	3.5
	7p	112	119	125	3.5
	8p	121	128	134	3.5
6b	7p	116	123	129	4
	8p	125	132	138	4

Notes to Table 3.1

Key

b: bedrooms

p: persons

* New dwelling in this context includes new build, conversions and change of use.

* Where a studio / one single bedroom one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sq.m. to 37 sq.m., as shown bracketed.

The London Plan 2021 equivalent policies are policies D5, D6 and D7 - all these policies are similar if not identical to previous policy 3.5 in terms of what they are trying to achieve.

6.11 Policy 4.1 - Developing London's Economy - The policy states:

The Mayor will work with partners to:

a1 - promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors

a2 - maximise the benefits from new infrastructure to secure sustainable growth and development

b - drive London's transition to a low carbon economy and to secure the range of benefits this will bring

c - support and promote outer London as an attractive location for national government as well as businesses, giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy

d - support and promote the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity

e - sustain the continuing regeneration of inner London and redress its persistent concentrations of deprivation

f - emphasise the need for greater recognition of the importance of enterprise and innovation

g - promote London as a suitable location for European and other international agencies and businesses.

In terms of the London Plan 2021, the above policy have fallen away and is no longer relevant.

6.12 Policy 4.4 - Managing Industrial Land and Premises - the policy states (summarised):

Strategic

A - The Mayor will work with boroughs and other partners to:

a - adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space

b - plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

LDF preparation

B - LDFs should demonstrate how the borough stock of industrial land and premises in strategic industrial locations (Policy 2.17), locally significant industrial sites and other industrial sites will be planned and managed in local circumstances in line with this strategic policy and the location strategy in Chapter 2

In terms of the London Plan 2021 equivalent policies - these are Policy E5 (Strategic Industrial Locations) and E6 (Locally Significant Industrial sites) - again there has been not significant change in policy stance and the new policies are similar if not identical to previous equivalent London Plan policies in terms of what they are trying to achieve.

6.13 Again, in light of the LPA's reasons for refusal, the following **Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)** policies are considered particularly relevant in this appeal:

6.14 **Policy EA1 - Economic Development** - The Policy states:

The Royal Borough supports the expansion of existing businesses and increased employment opportunities. New, high quality jobs that meet the needs and skills of local people will be created by:

- Concentrating retail, leisure, cultural and office development within the hierarchy of town centres. In particular the Royal Borough seeks to improve the quality and positioning of Woolwich Town Centre. (refer to policy TC2);
- The development of a new employment and creative industries hub at North Greenwich Designating a new leisure-led District Centre at North Greenwich encompassing the O2 Arena and surrounding area (refer to policy TC5);
- Increasing employment opportunities in the new and emerging low carbon sectors and advanced manufacturing;

- The development of new urban quarters at Charlton Riverside and Greenwich Peninsula West along with the planned intensification of existing employment land (refer to policies EA2 and EA3); and
- Supporting the development of small and medium business space.

6.15 Policy EA(a) - Local Employment Sites - The Policy states:

The Royal Borough seeks to maximise the contribution to employment in Royal Greenwich from sites in existing or previous employment use. Non employment uses will only be permitted on vacant employment sites where it can be demonstrated that:

- i. The site is environmentally or physically unsuitable for any employment generating use;
- ii. Marketing on fair price and terms for at least two years indicates there is no realistic prospect of any form of employment arising; or (emphasis added)
- iii. Employment is only viable within a mixed use scheme.

6.16 Policy H5 - Housing Design - the Policy states:

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 and expect the following:

- i. For new build homes, the achievement of Code for Sustainable Homes of at least code level four (4);
- ii. The design of the development is consistent with Policy DH1 and, for all new build housing developments, is also consistent with the Mayor of London's Housing SPG;
- iii. An acceptable level of noise insulation being achieved by means of sensitive design, layout and in developments vulnerable to transportation noise and vibration;
- iv. A presumption against single-aspect north facing units and a presumption in favour of dual aspect units where possible;
- v. In flats, a good-sized balcony, a terrace or enclosed communal gardens should be provided;
- vi. Family housing should normally have direct access to a private garden. Schemes with predominantly family housing should, as far as practicable, be within reasonable walking distance of nursery and primary schools, local shops, play areas and amenities;
- vii. Safety and security of residents and public (see also Policy CH1);

- viii. The provision of new housing to Lifetime Homes standards;
- ix. In residential developments of 25 or more units, 10% of dwellings to be built to full wheelchair standard, or easily adaptable for residents who are wheelchair users;
- x. New build developments of flats that are three or more storeys will be required to have sufficient lifts;
- xi. Adequate provision for waste recycling; and
- xii. The achievement of the BREEAM Standards for Domestic Refurbishment rating of 'Excellent'.

6.17 Policy DH1 - Design - the Policy states:

All developments are required to be of a high quality of design and to demonstrate that they positively contribute to the improvement of both the built and natural environments. To achieve a high quality of design, all developments are expected to:

- i. provide a positive relationship between the proposed and existing urban context by taking account of:
 - topography, landscape setting, ridges and natural features;
 - existing townscapes, local landmarks, views and skylines; the architecture of surrounding buildings;
 - the need to retain trees in line with Policy OS(f) and Policy OS(g);
 - the quality and nature of materials, both traditional and modern;
 - established layout and spatial character; the scale, height, bulk and massing of the adjacent townscape;
 - architectural, historical and archaeological features and their settings;
 - the effective use of land;
 - the potential for a mix of uses;
 - patterns of activity, movement and circulation particularly for pedestrians and cyclists;
 - the cultural diversity of the area; and
 - acceptable noise insulation and attenuation;
- ii. promote local distinctiveness by providing a site-specific design solution;
- iii. demonstrate that the development contributes to a safe and secure environment for users and the public (See Policy CH1);
- iv. achieve accessible and inclusive environments for all, including disabled people;
- v. create attractive, manageable well-functioning spaces within the site;
- vi. maximise energy conservation, through effective layout, orientation, use of appropriate materials, detailing and landscape design (also see Policy E1);
- vii. benefit Royal Greenwich by helping mitigate and adapt to climate change;

- viii. enhance biodiversity consistent with the Greenwich Biodiversity Action Plan;
- ix. incorporate living roofs and/or walls in line with Policy E(f);
- x. demonstrate on-site waste management including evidence of waste reduction, use of recycled materials and dedicated recyclable waste storage space;
- xi. Demonstrate water efficiency and demand management measures;
- xii. wherever possible, ensure building materials are responsibly sourced and minimise environmental impact;
- xiii. demonstrate measures that reduce surface water flood risk and landscape the environment in a way that provides for permeable surfaces;
- xiv. meet the requirements of Policy H5 for residential schemes;
- xv. integrate with existing path and circulation networks and patterns of activity particularly for pedestrians and cyclists; and
- xvi. for non-residential buildings in major developments, achieve a BREEAM rating of 'Excellent.'

6.18 **The Nationally Described Space Standards (2015)** and the **Mayor of London Housing SPG (2016)** are also referenced in the LPA's reasons for refusal. These have now been replaced by the 2021 standards in the London Plan 2021, for this purposes of this planning application the standards remain exactly the same as outlined in paragraph 6.10 above.

6.19 Clearly this proposal is for the conversion of a disused historic coach house/former B8 storage building to a 1 bed, one person dwelling. The building in question is located in the centre of a well established and historic residential area.

7.0 PLANNING ASSESSMENT

7.1 The Town and Country Planning Act 1990 (section 70(2)) states, in dealing with planning applications, the Local Planning Authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. This is reiterated within paragraph 47 of the NPPF (2019).

7.2 In line with the Procedural Guide on Planning Appeals – England (updated Aug 2019), the Applicant will now be outlining his case and why the LPA made serious errors in the assessment of the previous application, the applicant will be focussing on the reasons for refusal, the officer's delegated report, relevant planning policies put forward by the LPA, other material planning considerations, as well as the planning merits and planning balance of the previous scheme, which will be the same as existing scheme.

7.3 The LPA in their first reason for refusal states *'By reason of the loss of the existing B8 use with no evidence to justify the loss, the proposal would cause*

harm to the provision of employment floorspace within the immediate area as well as the wider borough. The proposal would therefore fail to accord with policies 4.1 and 4.4 of the adopted London Plan (2016) and policies EA1 and EA(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies "Core Strategy" (July 2014).'

- 7.4 The Council in the 15 March pre-app notes states '*Policy EA(a) of the Local Plan does normally require that two years marketing information to be provided to justify the loss of any employment use. However, given the context of the use outside of a neighbourhood parade, local centre or other areas more appropriate for employment use, it is expected that you could be able to overcome this requirement in this instance without the two years marketing information where you are able to provide additional justification which demonstrates that the site is inappropriate for an employment use.'*

Additional Justification as requested by LPA officers:

- 7.5 The unit in question is a characterful historic coach house, surrounded by established residential terraces to the north, south, east and west. The site and building is located approximately halfway up Shooters Hill, one of the highest points in London. The roads in the neighbourhood are narrow and windy, with parked cars on both sides of the road. The building was last used by a self employed roofer for storage purposes (storage of ladders and other ancillary equipment) way back in 2015. The unit has been disused for 6 years. Technically the last known use of the building was for B8 storage, it was an open and unrestricted use (there were no restrictive conditions imposed on the B8 use - there is not even a planning entry available confirming the last known use of the building as a B8 storage use). Having regard to these considerations and insofar as the previous 'employment' use is concerned, any type of vehicle legally allowed on these narrow roads could legitimately access the unit at any time, day or night - such a scenario would have been realistic since an unrestricted B8 employment use would appear to be the permitted fallback position adopted by the Council.
- 7.6 Turning to the alleged policy conflict, the full text of Policy EA1 - Economic Development, is outlined in Section 6 and needs no repeating here. The policy relates to the expansion of existing businesses and increased employment opportunities. The policy EA1 is not relevant to this development proposal because the scheme is not for the expansion of an existing business (the unit has been vacant for 6 years). Ironically the proposal has in fact resulted in increased employment opportunities during the conversion phase and the unit is ideal for home working with its open layout and ample natural daylight and sunlight coming into the unit through its large south facing windows and doors (see images in Section 4 above). The Applicant, a qualified architect, is currently working from home like millions of other people across the world, the home working trend is very likely to continue indefinitely. Whilst policy EA1 is not even relevant to the development proposal there is in fact NO CONFLICT with this policy.

- 7.7 Turning to Policy EA(a) - Local Employment Sites (again full text outlined in section 6), it is important to stress that the development proposal has to comply with only one of the sub-points (i, ii OR iii) in the policy. For completeness we will include an assessment against all 3 points in the policy. In the context of this proposal the first part of the policy requires development proposals to demonstrate that:

The site is environmentally or physically unsuitable for any employment generating use

- 7.8 Having regard to the fact that the last known use was for B8 storage purposes and the character of the area (see paragraphs 2.1 - 2.3), is it considered that the site is environmentally and physically unsuitable for any modern form of storage/distribution purposes, this is made clear in paragraph 2.3 of the Design and Access Statement submitted with the application. In terms of other employment generating uses, again the site is in an established residential area, it is surrounded by residential properties on all sides, and any employment generating use will only ever be truly viable (in this context, having regard to the unique site characteristics) in the form of a residential use offering a flexible home/work space. The design and layout of the unit offers functional, effective and high quality home working potential with the bedroom and shower/toilet facilities on ground floor and an open plan kitchen/living/work space on first floor with good natural daylight and sunlight as well as excellent views out towards the historic terraces opposite the road. The majority of other B uses (now referred to as Class E(c) and E(g) uses in the new use classes order that took effect from 1 Sept 2020) such as other commercial or industrial processes are considered to be inappropriate in this established residential area. The fact of the matter is the building in question was a historic coach house, the site is in a historic residential area, the building was constructed for its intended purpose back then, we are now in the 21st century and the proposal includes a very sensitive conversion of this historic coach house into a residential unit which offers great potential for home working. The proposal complies with point (i) of policy EA(a) and therefore already meet the requirements of the policy (because a development proposal only have to comply with one of the subsections - hence the use of the word OR in the policy). For completeness we will cover off the other two subsections aswell.

Marketing on fair price and terms for at least two years indicates there is no realistic prospect of any form of employment arising

- 7.9 Appendix 1 attached includes the marketing material for the unit. The unit in question was accurately marketed by Robinson-Jackson as a business unit or a site offering development potential (subject to planning). As stated above, the unit was vacant /disused for approximately 6 years, it was on the market for approximately 3 months before it was sold to the Applicant. The

only realistic prospect of any form of employment arising on this site, in this building and having regard to the character of the area, is in the form of a residential conversion offering home working potential. The proposal complies with point (ii) of policy EA(a).

Employment is only viable within a mixed use scheme

- 7.10 It is a unique site and a unique building. The site, due to its size does not offer an opportunity for a mixed use scheme, it is unrealistic and unreasonable to expect a mixed use scheme in a strong residential area such as this, in any event, a mixed use scheme will never be viable in this scenario due to the site constraints.
- 7.11 Having regard to all of the above, there is in fact NO CONFLICT with policy EA(a) of the Core Strategy. The policy clearly states that development proposals should meet either points i, ii OR iii. The scheme fully complies with points i, ii and iii.
- 7.12 In terms of the new London Plan policies, the policies are strategic policies and the full text of these policies are available in the London Plan. The proposal fully complies with policies E5 and E6 of the 2021 London Plan, in fact, most of policies E5 and E6 are not even relevant to this small scale and strategically insignificant change of use in the heart of a historic and characterful residential area.
- 7.13 For completeness the site is not in a strategic industrial location and it is not a locally significant industrial site. It was a disused and dilapidated building in the heart of a residential area. The last known use of the building was for storage purposes for a local roofer and so the site can also not be classed as 'other industrial sites'.
- 7.14 In summary, having regard to this additional information and justification provided, and in respect of reason for refusal 1, the proposal would cause NO harm whatsoever to the provision of employment floorspace within the immediate area as well as the wider borough. In fact the proposal brings back into use a disused and dilapidated building in the heart of an historic residential area and offers an opportunity for an individual to work from home in a high quality, healthy and sustainable environment. There is therefore NO CONFLICT whatsoever with employment related London Plan (2021) policies or policies EA1 and EA(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies "Core Strategy" (July 2014).
- 7.15 Turning to reason for refusal 2 and having regard to the 11 March 2021 pre-application discussions, the LPA essentially raises 3 issues in respect of the proposed unit, they state by reason of (1) the inadequate floorspace provision, (2) limited floor to ceiling heights and (3) limited outlook available to the ground floor habitable room, it is considered that the development does

not provide an acceptable quality of accommodation for existing and future residents.

7.16 Taking each of the 'issues' in turn:

Internal floorspace provision

- 7.17 The drawings have been amended in line with LPA advice and a 1 bedroom, one person unit is now proposed. The net internal area (i.e. the usable area measured to the internal finish of the perimeter and party walls at each floor) of the dwelling is **39.56sqm**. The internal floor area therefore meet and exceed the minimum gross internal space standard of both the London Plan (table 3.1) and the Nationally Described Space Standards for a 1 bedroom, 1 person unit. In fact, table 3.1 of the new London Plan makes it clear (in the notes to table 3.1) that where a one person dwelling has a shower room instead of a bathroom (as is the case here), the floor area may be reduced from 39m² to 37m², as shown bracketed. The proposal therefore far exceeds the minimum prescribed floorspace standard. Regard should also be had to the fact that this is a conversion scheme and significant weight should be attributed to the fact that a disused and dilapidated building in a sustainable location is brought back into use, exactly as per the requirements of the NPPF.

Floor to ceiling heights

- 7.18 The floor to ceiling height on ground floor is 2.1m. The floor to ceiling height on first floor level is between 2.116 (at the lower end next to kitchen area and above the staircase) increasing to 2.647m towards the party wall shared with No. 53 to the east. Insofar as floor to ceiling heights are concerned, and purely from a technical perspective, there is minor conflict with the Nationally Described Space Standards. So in line with the Town and Country Planning Act 1990 (section 70(2)), where there is conflict or minor conflict with a said policy or SPD, we are now required to have regard to all the other material planning considerations.
- 7.19 The prescribed floor to ceiling height of 2.3m as set out in the London Plan and the Nationally Described Space Standards is in place mainly to address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development. The prescribed floor to ceiling height, as per the notes in the London Plan and the Nationally Described Space Standards, is *'encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space'*. The LPA had no regard to this in their previous assessment - this was an error.
- 7.20 The unit benefits from large south facing and full height glazed doors in both ground and first floor. Ample daylight, sunlight and natural ventilation enter the unit, light circulation is excellent due to the open and functional layout of the unit. The first floor it fitted with two velux rooflights set into the ceiling

space above the living and dining space, resulting in the floor to ceiling height of 2.9m directly below the rooflights, and these features further improve ventilation and the sense of space in the unit. The benefits of the new residential use at the site far outweighs this very minor technical 'policy' shortfall. In addition, significant weight should be given the fact that this is a conversion scheme, the proposal brings back into use a perfectly good and robust building, the scheme makes effective use of brownfield land and it is abundantly clear (in light of fact that the unit was empty for over 6 years and having regard to the employment impact assessment above) that there are practical and logistical constraints preventing this unit from being used as a modern storage unit. There is in fact no conflict with the cited employment policies.

Outlook available to the ground floor habitable room

- 7.21 In terms of outlook, it is worth pointing out that the LPA case officer never undertook a site visit and never saw the inside of the building/outlook from ground floor level. Photographs of the views from ground floor bedroom were requested at the subsequent pre application meeting and this has now been provided. The LPA indicated in their pre-application reply that the outlook is acceptable. In addition, the ground floor bedroom has a large south facing, fully glazed opening in the form of a double door leading out onto a 13 square metre internal patio area with planters containing native plant species. The Applicant installed high quality timber gates to ensure an aesthetically pleasing appearance, appropriate defensible space and a functional and attractive south facing external amenity area. The outlook from the ground floor bedroom is no different to millions of other similar bedroom spaces across the country in higher density inner city urban locations. In fact the outlook is very acceptable as it provides partial south facing views of an attractive Victorian facade on the opposite side of the road, and full views of a private patio containing plants and high quality paving, historic London stock brick and a timber gate). In terms of the suggestion to lower the boundary wall, this is considered to be unnecessary as a balance need to be struck between the need to ensure a reasonable level of privacy for the occupier of the unit, a good level of security and aesthetics. In any event, the front wall is an existing wall and a 13 sqm south facing external and exclusive private amenity area for one person is perfectly reasonable and in line with policy.
- 7.22 In terms of other alleged policy conflict, the LPA cite policies H5 and DH1 of the Core Strategy, and policy 3.5 of the London Plan in their second reason for refusal. All these policies are extensive and detailed and the LPA do not indicate which parts/sections of the policy the alleged conflict arises. One can only assume that it is to do with the subsections (in the above mentioned policies) relevant to internal floorspace, floor to ceiling heights and outlook.
- 7.23 Fundamentally policy H5 seeks to ensure conversions schemes achieve a high quality of housing design and an integrated environment. The proposal

meet and exceed all of the relevant subsections of the policy for all the reasons outlined in paragraphs above and further below.

- 7.24 Policy DH1 seeks to ensure developments are of a high quality of design and positively contribute to the improvement of both the built and natural environments. Again the proposal meet and exceed all of the relevant subsections of the policy for the reasons outlined in paragraphs above and below - there are no conflict with any of these policies.
- 7.25 Having regard to the detailed assessment above it is considered that there is NO CONFLICT with the identified design policies DH1, DH5 and DH(a) of the Core Strategy, or policy 3.5 of the London Plan. The only area of very minor conflict is with table 3.1 of the London Plan and the Nationally Described Space Standards - i.e. a minor shortfall in floor to ceiling heights. In line with the Town and Country Planning Act 1990 (section 70(2)), where there is conflict or minor conflict with a said policy or SPD, a decision maker should then turn to other material planning considerations.
- 7.26 As mentioned above, the only area of conflict is on technical grounds in respect of the minor shortfall in the floor to ceiling heights. It is considered that the other material planning considerations as outlined in paragraphs 7.17 - 7.21 above significantly and demonstrably outweigh the very minor technical shortfall and clearly points towards an acceptable internal layout and living environment.

8.0 SUMMARY

- 8.1 In conclusion, as acknowledged in national, regional and local policies, there is very strong support in all these policy documents to prioritise urban brownfield sites in sustainable areas, and to re-purpose disused or redundant buildings in residential areas. Significant weight should therefore be afforded to this clear benefit.
- 8.2 The one bedroom, one person unit provides much needed, flexible accommodation in a highly sustainable location, and accommodation that is clearly capable of offering excellent home working conditions, again these elements should be given significant weight. The scheme results in a significant improvement to the external appearance of this unique historic building in this residential enclave, and the Council agree that the proposal results in an enhancement to the streetscene. The proposal brought forward employment benefits in the form of the jobs created during the conversion phase and also over the longer term in the form of a unit that clearly offers home working conditions, these benefits we would argue should be afforded significant weight in light of the fact that the unit has been vacant and left to deteriorate for a period of in excess of 6 years.

- 8.3 As mentioned, the only area of very minor conflict occurs with table 3.1 of the London Plan and the Nationally Described Space Standards. We have demonstrated that this minor conflict is clearly outweighed by all the other material planning considerations outlined in relevant paragraphs above, and all the other clear and substantial benefits as outlined in this statement.
- 8.4 In this respect, it is concluded that the proposal is found to be in accordance with all other local guidance, relevant policies in the Greenwich Core Strategy, the NPPF as well as the London Plan, with the exception of the minor conflict identified but outweighed by other material planning considerations, and the clear benefits of the scheme. This application should therefore be approved without delay.

ATTACHED AS A SEPARATE DOCUMENT:
APPENDIX 1 - Marketing evidence