



7a Pindock Mews, Little Venice, London W9 2PY, UK
T: +44 (0)20 3713 8500 E: contact@dominiclawson.co.uk
www.dominiclawson.co.uk

Planning Statement



Project: Full Planning Permission
Site Name: Westmount Surgery, 191 Westmount Road, Eltham, London SE9 1XY
On behalf of: Expedius Properties
Date: 19 July 2021

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VAT registration number 260 6370 18.

CONTENTS

A. SUMMARY AND CONCLUSION	3
B. THE SITE AND THE PROPOSAL	4
C. PLANNING POLICY COMPLIANCE	7

A. SUMMARY AND CONCLUSION

1. This Planning Statement accompanies the full planning application to the Royal Borough of Greenwich (“the Council”) regarding a proposal for the “Change of use from medical surgery (Use Class E) to single dwelling (Use Class C3), alterations to the existing single-storey rear extension, internal changes, insertion of rear dormer window and the erection of garden office to the rear” at Westmount Surgery, 191 Westmount Road, Eltham, London SE9 1XY (“the site”).
2. The property is located in a residential area and is previously developed land. The application site comprises a vacant two-storey terraced property, the most recent lawful use of which was as a medical surgery (Use Class E).
3. The proposed development will convert the former medical surgery into a single dwellinghouse. The insertion of a rear dormer window, alterations to the existing rear extension and internal changes are proposed to improve the internal layout and provide a four bedroom family dwelling. This will be a sustainable form of development that will make a meaningful contribution to the delivery of homes in the Borough. The proposal will secure new housing on a brownfield site that is not subject to any constraints or restrictions.
4. The planning application also encompasses the erection of a garden office to the rear of the property.
5. The design of the scheme has been carefully prepared having regard to the character and appearance of the immediate and surrounding area. No alterations are proposed to the front elevation of the existing building. All of the proposed changes will be out of view of the public highway.
6. There will be no detrimental impact with respect to the residential quality of the dwellings themselves, impacts on adjacent occupiers, transport implications or other such effects.
7. The proposed development is in complete accordance with the development plan and national planning policy. There are no material planning considerations that weigh against it - indeed, the material planning considerations add further weight in support of granting permission. We therefore respectfully request that planning permission is granted.

B. THE SITE AND THE PROPOSAL

The site

8. The application site comprises a two-storey terraced property in the Eltham North ward of Greenwich.
9. The property is currently vacant and has been unoccupied since 30 December 2019. The most recent lawful use of the site was as the Westmount Surgery. The property comprises of a reception, waiting rooms, treatment room, consulting room and toilet at ground floor level, and a waiting room, consulting room, office, kitchenette and toilet at first floor level.
10. Externally, the front of property is finished in pebble-dash with white framed UPVC windows and white window surrounds and details, and a tiled roof. The rear of the property is finished with the same materials and details, with a 'L' shaped single-storey rear extension with two skylights.
11. Off-street parking for two cars is located to the front of the property. A private garden lined with trees and shrubs is located to the rear. The garden is accessed through the property only.
12. The site is located in a residential area. The property forms part of a terrace with No. 189-201 (odds) Westmount Road to the north and south. The front elevations of the adjoining properties are similar in appearance. To the rear, many properties within the terrace have single-storey rear extensions, and there are examples of rear dormer windows at roof level.

Planning Designations

13. The site is not located within a Conservation Area or within the setting of a listed building. There are no Tree Preservation Orders present at the site. The site is not located within the Metropolitan Green Belt.
14. The site is in Environment Agency (EA) designated flood zone 1.
15. The site has a Transport for London Public Transport Accessibility Level (PTAL) score of 2, and there are areas of Level 3 in close proximity.

Planning History

16. The relevant planning history for the site is summarised below:
 - 89/0214/P - Continuation of use of ground floor as surgery and change of use of first floor from private residential accommodation to surgery. Approved 4 May 1989.
 - 93/0616/F - Erection of a single storey rear extension. Approved 11 March 1993.

- 20/1449/F - Change of use from medical centre (Use Class D1) to a single dwelling (Use Class C3) and associated internal reconfiguration. Refused 12 January 2021.
- 21/1013/F - Change of use from medical surgery (Class E) to Residential (Class C3) (1 x 3-bed). Approved 14 May 2021.

The proposed development

17. The proposal is for the change of the existing use of the site as a medical surgery (Use Class E) to a single residential dwelling (Use Class C3). The proposed development will also alter the existing single-storey rear extension, change the internal layout of the property, and insert a rear dormer window to create a four bedroom family home. The existing 'L' shaped single-storey rear extension will be filled in to create a rectangular extension. The internal layout will be changed to provide rooms suitable for the residential use. A rear dormer will be inserted to allow the conversion of the existing roof space and the provision of further living space.
18. Internally, the proposed dwelling will have a reception room, kitchen / living room / diner and utility room and toilet at ground floor level, and three bedrooms and a bathroom at first floor level. One further bedroom and a bathroom will be provided in the loft.
19. Externally, two skylights, two windows and a door to the rear at ground floor level will be replaced by one skylight, one window and bi-fold doors, and a rear dormer window will be inserted at roof level. All materials used will match those of the existing building. No other changes are proposed to the front or rear elevations.
20. The proposal also encompasses the erection of a garden office to the rear of the property. The garden office will be located furthest from the property and will be single storey in height, measuring 2.70 m from the floor to eaves at its highest point. The garden office will be brick built and rendered to match the existing building.
21. No changes are proposed to the front of the property, where two off-street parking spaces will be retained.

Supporting documents and plans

22. Along with this Planning Statement, the planning application comprises the following supporting documents and plans:
 - Application form;
 - CIL Additional Information form;
 - DWG1A - Site Location Plan;
 - DWG1B - Existing Block Plan;
 - DWG1C - Proposed Block Plan;
 - DWG2 - Existing Floorplans;

- DWG3 - Existing Roof Plan;
- DWG4 - Proposed Floorplans;
- DWG5 - Proposed Loft & Roof Plans;
- DWG6 - Existing Front & Rear Elevation;
- DWG7 - Existing Side A Elevation;
- DWG8 - Existing Side B Elevation;
- DWG9 - Proposed Front & Rear Elevation
- DWG10 - Proposed Side A Elevation;
- DWG11 - Proposed Side B Elevation;
- DWG12 - Existing Section;
- DWG13 - Proposed Section; and
- DWG14 - Proposed Outbuilding Plans.

C. PLANNING POLICY COMPLIANCE

Planning policy framework

23. The development plan comprises:
 - the London Plan (2021); and
 - the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
24. The National Planning Policy Framework (2019) (“the Framework”), the Royal Borough of Greenwich Residential Extensions, Basements and Conversions Guidance SPD (2018), and the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) are material considerations.
25. The main considerations for the proposed development are:
 - the principle of the development;
 - the design and appearance;
 - the residential amenity of future occupiers and neighbours; and
 - the amenity of neighbours, particularly in respect of privacy and overlooking.

Principle of the development

Loss of an community facility

26. The proposed development is for the change of the sites existing use as a medical surgery (Use Class E) to a single residential dwellinghouse (Use Class C3). A medical surgery is considered a community facility, the loss of which will be resisted unless justified by sufficient evidence.
27. Planning application (LPA ref 21/1013/F) for the change of this site from a medical surgery to residential use was granted approval on 14 May 2021. With regards to the loss of a community facility, the planning officer found the proposed development would “*not create or add to a shortfall in provision for the specific community use and that alternative community facilities of a similar nature are provided locally in the area which that facility serves*”, and that “*due to the location of the application site, the continued use of the site as a community use that does not constitute a medical surgery may bring forward concerns with respect to noise impacts and parking concerns*”. The loss of the community use was considered to have been sufficiently justified and so acceptable in this instance.
28. There has been no change to the lawful use of the site since the above application was approved and the property has remained vacant ever since. Due to this extant permission, the loss of an existing community facility that would result from this application is acceptable

in principle. The proposed development therefore complies with Policies CH1, CH(a) and EA(a) of the Council's Core Strategy, and Policies S1 and S2 of the London Plan.

The provision of a residential dwellinghouse

29. The Framework requires local planning authorities to deliver a wide choice of high quality homes, widen opportunities for home ownership, and create sustainable, inclusive and mixed communities. Paragraph 68 of the Framework identifies that small and medium sized sites can make an important contribution to meeting the housing requirement of an area.
30. The proposed development is seeking to develop the site to deliver a new residential dwelling helping to meet the Governments overriding objectives, and is on a site that paragraph 68 confirms as being suitable in principle.
31. Chapter 11 of the Framework includes the requirement for local planning authorities to proactively drive and support sustainable development to deliver the homes the country needs in a way that makes as much use as possible of previously developed or 'brownfield' land. The site is classified as being previously developed brownfield land.
32. Paragraph 118 of the Framework outlines a number of points where planning should support the increase in use and density of sites. Point C is of importance, which states that planning decisions should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs". This site clearly meets the Government's definition of previously developed land and therefore its development meets a core national planning requirement.
33. Policy H1 of the London Plan sets out the ten-year housing targets for net housing completions for each Borough. In order to meet these targets, Boroughs are encouraged to optimise the potential for housing delivery on all suitable and available brownfield sites. This applies especially to small sites. Policy H2 of the London Plan is entitled 'Small sites' and so is relevant to this proposal. The supporting text to the policy at paragraph 4.2.1 sets out that (emphasis added):

*For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, **increasing the rate of housing delivery from small sites** is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.*
34. Policy H2 of the Core Strategy seeks to promote a mix of housing types and sizes that vary according to the location of the development and the character of the surrounding area.
35. The proposal is for the change of use of the site and other alterations to provide a single four bedroom family dwelling. This development will make a material contribution to the objectives of increasing supply and widening the range of dwellings currently available, both in this area and the Borough as a whole, in line with higher authority and Government

objectives. The London Plan also encourages this type of small site contribution to meeting housing demand. Substantial weight should also be given to national policy in respect of the supply of housing land and to the development of a brownfield site.

36. The principle of changing the use of the site and making alterations to the property in order to provide a new residential dwelling aligns with Policy H2 of the Council's Core Strategy, Policies H1 and H2 of the London Plan, and the higher objectives of the Framework.

Design and appearance

37. Section 12 of the Framework relates to design and states that the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. Paragraph 131 states that great weight should be given to outstanding or innovative designs that promote high levels of sustainability or help to raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of the sites surroundings.
38. The Framework encourages all new development to be of a suitably high quality. The London Plan builds on this by stating the importance of good design across all areas of development, specifying that development should be of a high quality and respect and respond positively to existing buildings, the streetscape, and wider context. Buildings and structures should also comprise details and materials that complement the local architectural character. In particular, Policy D3 specifies the need for new development to respect the character of the surrounding area whilst also making a positive contribution to the identify of a place.
39. Policy H5 of the Core Strategy sets out that the redevelopment, refurbishment or conversions of properties in the Borough is expected to achieve a high quality of housing design. This is reiterated by Policy DH1 which requires proposals for new development to be of a high-quality design and demonstrate a positive contribution to improving the built environment. The Council's Residential Extensions, Basements and Conversions Guidance also advises that all changes of uses to residential are expected to achieve a high standard of sustainable design.
40. The site is located in a residential area predominantly comprised of terraced properties. The front elevation of the terraces are similar in their character but vary in style. To the rear, there is less of a prevailing character, with many properties altered to provide single-storey rear extension and rear dormer windows.
41. The proposed development has been designed with due consideration for the character and appearance of the existing building, as much as for the wider area. The proposal will not encompass any changes to the original principal elevation and there will be no increase in overall height of the existing building.

Ground floor rear elevation

42. With respect to the rear extension, the proposed alterations are modest and will in effect infill the existing L shaped. The proposal will result in an extension that is of a similar depth and size to those constructed at 189 and 193 Westmount Road. The proposal will therefore have no adverse impact on the character to the property or on the overall character of the area.
43. In accordance with the Council's guidelines, the alterations proposed to the existing single-storey rear extension ensure that it will not dominate and remains subservient to the host dwelling. All of the proposed windows and doors will be proportionate to and match the materials used in the remainder of the property. The proposed development will have no effect on the streetscene. The proposed development therefore complies with Policy DH(a) of the Council's Core Strategy and the supplementary planning guidance.

Rear dormer window

44. Policy DH(a) of the Core Strategy requires roof extensions to be designed to respect the scale and character of the host building, the street scene and the surrounding area, and respect the amenities of adjacent occupiers. The Council's Residential Extensions guidance suggests roof extensions should be proportionate to the size of the original house, and that any proposals which change the roof form should seek to preserve or enhance the existing appearance in terms of height, scale and visual interest.
45. The proposed dormer window is modest in scale and smaller than the limits set out in the legislation. The size of the windows will match those of the existing property as well as those of the adjacent properties. A flat roof is proposed so to not increase the overall height and remain in-keeping with the prevailing design of properties in this terrace.
46. The proposal gives regard to the quality, character, materials and scale of the principal building, is subordinate to the existing building, and does not over develop the site in terms of mass and density.
47. Rear dormer windows form part of the character of the area and there are many examples in the rear elevations along Westmount Road. This includes at 169, 175 and 197 Westmount Road, as per the images below:



Figure 1: Examples of rear dormer windows at (L-R) 169, 175 and 197 Westmount Road

48. The proposed development will have no effect on the streetscene.
49. The proposed insertion of a rear dormer window therefore complies with Policy DH(a) of the Council's Core Strategy and the supplementary planning guidance.

Garden office

50. The Council's Core Strategy does not have any specific policies relating to development in private gardens, however the Council's Residential Extensions guidance states that *"Outbuildings should be in proportion to the original house and garden and should not impact upon the open character of the surrounding area. They must be sensitively designed, in the appropriate locality, taking into account the residential amenity of neighbouring properties including for daylight, sunlight and privacy."* (paragraph 5.21).
51. The proposal will result in the erection of a garden office to the rear of the property. This will be sensitively located and will be single storey in height, measuring 2.70 m from the floor to eaves at its highest point. The garden office will be brick built and rendered to match the existing building. The garden office will also be screened on three sides by established trees and shrubs.
52. The proposed garden office has been design and situated with consideration for the surrounding area and the amenity of neighbouring properties, in line with the Council's supplementary planning guidance. The outbuilding will be modest in size and again will be

wholly in accordance with the prevailing character of the area, which includes outbuildings of varying sizes.

53. The proposed development will have no effect on the streetscene.
54. The proposed garden office outbuilding therefore complies with the Council's Core Strategy and supplementary planning guidance.

Conclusion

55. In conclusion, for the reasons outlined above, the design, scale, appearance and impact on the character of the area associated with this proposed development will be acceptable. The development will integrate acceptably into the surroundings having regard to Policies H5, DH1 and DH(a) of the Core Strategy and Policy D3 of the London Plan.

Residential amenity of future occupiers and neighbours

Future occupiers

56. Policy D6 of the London Plan sets out the required quality and standard for housing in the Greater London area. The policy states that all housing development should be well designed and provide adequately-sized rooms in line with the minimum space standards of Table 3.1. Policy D6 goes on to state that dwellings should also be designed to have comfortable and functional layouts which are fit for purpose and meet peoples needs.
57. The minimum internal space standards for a 4 bedroom 7 person two-storey dwelling is 115 sq m. The proposed development will provide a single family dwelling with a GIA of 161.81 sq m, and so is compliant with the technical space standards set out in the London Plan. The dwelling will include a kitchen, living room, four bedrooms and two bathrooms, which is sufficient for future occupants to live comfortably with all of their needs met.
58. Policy D6 of the London Plan also sets out the standards for amenity space and states that, where there are no higher local standards, a minimum of 5 sq m of private outdoor space should be provided for 1-2 person dwellings and an additional 1 sq m per each additional occupant.
59. The proposed development complies and exceeds the above standards by providing a private outdoor amenity space of approximately 130 sq m.
60. Policy D3 of the London Plan encourages development proposals to deliver appropriate levels of outlook, privacy and amenity. Policy D6 also states that, where a single aspect residential development is proposed, it must be demonstrated that future occupants will be provided with adequate privacy and daylight.
61. With regards to the approved application (LPA ref 21/1013/F), the planning officer found all bedrooms and habitable spaces to receive "*adequate levels of outlook and would receive a satisfactory amount of daylight.*". The planning officer also found that all proposed habitable

spaces would receive adequate levels of privacy and would not be significantly overlooked in any capacity.

62. This application proposes the insertion of a dormer window to provide a new openings on the western elevation. The proposed new openings will ensure that all future occupants are provided with the optimum level of amenity by ensuring habitable rooms in the roof also receive sufficient levels of natural light.
63. The proposed development will provide a high quality standard of accommodation in line with Policies D3 and D6 of the London Plan.

Neighbouring properties

64. Policies D3 and D6 of the London Plan emphasise the importance of ensuring that buildings are well designed so to not prejudice neighbouring amenity. Policy DH(b) of the Core Strategy reiterates this and 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, or by creating an unneighbourly sense of enclosure.
65. The Council's supplementary planning guidance also recommends that residential extensions are designed to ensure there is not an unacceptable loss of privacy to neighbouring dwellings and garden, and to avoid overshadowing of neighbouring habitable rooms or private gardens.
66. In terms of privacy and overlooking, the adjoining properties of 189 and 193 Westmount Road will not be adversely impacted by the proposed development in terms of privacy and overlooking. No windows are proposed to the side elevations of the altered single-storey rear extension or the rear dormer. The proposed window and doors at ground floor level and the proposed windows at roof level will not result in a considerable loss of privacy exceeding that of the existing arrangement. The proposed garden office is also single storey in height and so would not impact on the privacy of adjacent properties. Residential properties on Rochester Way could potentially be impacted by the inclusion of a dormer window, however the minimum separation distance between the proposed windows and 560 Rochester Way is approximately 38 meters. The potential for overlooking between 191 Westmount Road and surrounding properties is also mitigated by an established intervening mature tree line.
67. The proposed dormer is of a modest scale and will not increase the height of the building, and so will not result in a significant loss of light to any of the neighbouring properties.
68. Policy D14 of the London Plan and Policy E(a) of the Core Strategy requires proposals for residential development to reduce, manage and mitigate noise to improve the health and quality of life for existing and future residents. The site is not in a location where excessive noise is generated and excessive levels of noise would also not be generated by the proposed residential use. The proposed residential use would not generate an increase in noise to a level greater than its previous and current lawful use as a medical surgery.

69. The nature and scale of the proposal would not cause impacts to neighbouring amenity in terms of overlooking and privacy and daylight / sunlight. The proposal is therefor wholly in accordance with Policies DH(b) and E(a) of the Council's Core Strategy, Policies Policies D3, D6 and D14 of the London Plan, and the objectives of the Framework.