



# Planning Statement



Evolution Estate Development Limited  
Land to the rear of 14-16 Vicarage Park, Plumstead  
December 2023

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## 1.0 Introduction

### Background

1.1 This planning statement has been prepared by MJP Planning on behalf of Evolution Estate Limited (the applicant). The applicant is proposing the erection of three family houses (3 bedroom/ 4 person) with associated landscaping, refuse storage and cycle parking on land to the rear of 14-16 Vicarage Park, SE18. The site is a square parcel of land that spans across parts of the rear gardens of the three properties at 14-16 Vicarage Park in Plumstead with the site effectively fronting onto Vicarage Road.

1.2 Full planning permission is sought for the following (the proposal):

*Construction of three dwellings with associated landscaping, refuse storage, and cycle parking.*

1.3 The principle of this development is fully supported by Greenwich Borough Council's adopted and emerging planning policies along with adopted the London Plan. London Plan policy H2 supports the development of small sites and sets boroughs a target of delivering a proportion of its annual housing target on small sites (defined as being less than 0.25 hectares). The policy states optimising housing on small sites should be pro-actively supported to 'significantly increase the contribution of small sites to meet London's housing needs.' This presumption in favour of development is further bolstered by London Plan Policy D3's support for the efficient use of land, in proposals such as this which optimise site potential. The proposal will provide three high-quality contemporary new dwellings in an area which is well suited to the provision of family housing.

1.4 The application is supported by a suite of supporting documents, which should be read in conjunction with this planning statement. The full submission comprises the following:

- Design and Access Statement (DAS) by GPAD Architects;
- Heritage Impact Assessment by HCUK;
- Planning Statement by MJP Planning;
- Transport Statement and Parking Survey by TTC; and
- Tree Survey and Arboricultural Impact Assessment by Arborclimb

### Pre-application engagement

1.5 The proposal has been subject to pre-application discussions with the Royal London Borough of Greenwich (the Council).

1.6 During the pre-application process (ref: 23/3240/PREI) a meeting took place with officers relating to the proposal for the new homes, comprising three dwellings. The meeting was held on 26th October 2023. Following feedback received in the meeting, design amendments and additional information has been included in the Planning Statement and DAS. The amendments included the removal of a floor and a general reduction in height. The pre-app advised that in order to reflect the established development pattern, the proposed second floor should be amended to complement the nearby properties. The proposed roof height must not exceed roof line from the neighbouring properties. The Officer advice from the pre-app response, was that that a building of a smaller scale would be more subordinate, and in keeping with the character of Vicarage Park. The response was issued on 31<sup>st</sup> October 2023. In providing pre-application advice, Greenwich planning officers confirmed the following:

- 1.7
- The principle for development is acceptable subject to amendment. Overall bulk and proportion is acceptable in principle, however, the proposed parapet details with a setback roof needs further consideration, as the current design is considered to be unacceptable.
  - The Highways comments stated that Given the limited access to public transport the sites location and the general lack of waiting restrictions in the area this is likely to encourage private transport such as car. Given that each dwelling is to be a family unit and have no parking provision, any potential associated parking demand would need to be met on street. A

more in-depth understanding of the Transport survey base data is required to provide clarity on the Transport survey results. In addition, the accompanying Transport statement sets out existing parking capacity.

- Overall, it is considered that the siting and scale of the buildings and their plot should be amended to ensure the development is in-keeping with the pattern of development within the area. In general, the proposed design approach and materiality of the dwelling would be acceptable and would be sympathetic in the context of the Conservation Area. Subject to further alterations, it is considered that the development could have an acceptable impact upon the character of the area and the Plumstead Common Conservation Area.
- Further consideration should be given to the detailed design approach. Furthermore, more information is required to justify that the development would not have an unacceptable impact with regard to transport and highways.

1.8 Following the issuing of the pre-application response, the height has been reduced to remove a floor and design changes have taken place. The scheme has been amended as follows:

- The changes made are included in more detail in the DAS, but involve height reduction to ensure a subservient relationship with adjacent buildings;
- The DAS notes that following pre-app feedback the proposal has been reduced in height in an effort to not appear too overbearing, the houses therefore follow the same rules as the typologies found along Vicarage Park;
- The proportions of roof form and overall composition have been developed in line with the proportions of existing houses, in-keeping with the character of the street; and
- The wider benefits of the scheme have been fully laid out within this Planning Statement and supporting documentation.

1.9 The DAS sets out how the design has been re-arranged with the overall mass and scale of the dwellings reduced and a floor removed. These amendments address the pre-application feedback and provide a design led solution which retains a quality of design.

## 2.0 Site description and planning history

### Site description

**Figure 1: Application site**



- 2.1 The site is situated in Plumstead, a suburb of the Royal Borough of Greenwich in South East London. The site is a square parcel of land that spans across parts of the rear gardens of the three properties at 14-16 Vicarage Park in Plumstead. 14 Vicarage Road is made up of 4 flats, 15 Vicarage Road is also 4 flats, and 16 Vicarage Park is one 6-bed house. Some properties along Vicarage Park have double garages and so the gardens along Vicarage Park back directly onto Vicarage Road. The site therefore has both direct pedestrian and vehicular access. The site is set at a considerably higher level than the properties on Vicarage Park and their rear gardens all have a large set of stairs up from the properties to their respective gardens.
- 2.2 The site lies within the northern part of the Plumstead Common Conservation Area (a designated heritage asset), to the north of Plumstead Common itself. The grade II listed Old Vicarage and associated gate piers and railings to the forecourt (also grade II listed) are the closest listed buildings to the site. The site is in Flood Risk Zone 1, affording a low probability of flooding.
- 2.3 The area immediately surrounding the site is residential in character made up of terraced properties and low-rise flatted blocks. Plumstead Common and Plumstead Nature Reserve is just to the south of the site, approximately 100m away (2-minute walk). The titles of the land have already been split and the six-bed house at 16 Vicarage Park is currently for sale with the smaller subdivided garden.
- 2.4 The site is approximately 800m from Woolwich Town Centre and approximately 1km from Plumstead District Centre, and so therefore recognised as being a suitable location for intensification within the London Plan (Policy H1) being less than 800m from a town centre. The site has a PTAL of 2, making it

less accessible by public transport. Plumstead station is 1km (15-minute walk) from the site and Woolwich Arsenal station is 1.1km (17-minute walk) from the site, with connections on the Elizabeth line into central London. Buses along Raglan Road to the north travel to Plumstead Common and Charlton and buses along Plumstead Common Road to the south travel to Lambeth North, Woolwich, Plumstead, and Orpington. Vicarage Road and Coupland Road are not subject to a CPZ

### **Planning history**

- 2.5 There is no relevant previous Planning history on the site, however a pre-application request has previously been submitted on the site in 2019 for a large three-storey flatted block of three units (ref: 18/2062/PRE). Officers considered the proposal did not accord with local policy H(c) and so did not support the principle of development at the outset. The proposed Scandinavian design was not considered to integrate with the established pattern of development and related poorly to surrounding properties in the area. The bulky three-storey massing would also compete with the Old Vicarage. The applicant team has reviewed this previous pre-app submission in detail and learnt from the feedback, proposing a smaller contextual development that respects and complements the character and historic setting of the area. It is also understood that adjacent sites along Vicarage Road have been subject to pre-application enquires although no applications have yet been submitted.
- 2.6 The current proposal is an opportunity to deliver much needed family housing whilst ensuring the development contributes to long term urban greening by providing a scheme that delivers significant planning benefits including high quality landscaping and sensitively designed housing, that on balance should be supported.
- 2.7 The submitted DAS includes a thorough assessment of the sites context and should be read in conjunction with the summary above.

### 3.0 Proposed development

3.1 This section is intended to be a high-level summary of the proposal and should be read in conjunction with the detailed assessment set out within the submitted DAS.

3.2 The proposed description of development is:

*The proposal is for the erection of three family houses (3 bedrooms) with associated landscaping, refuse storage and cycle parking*

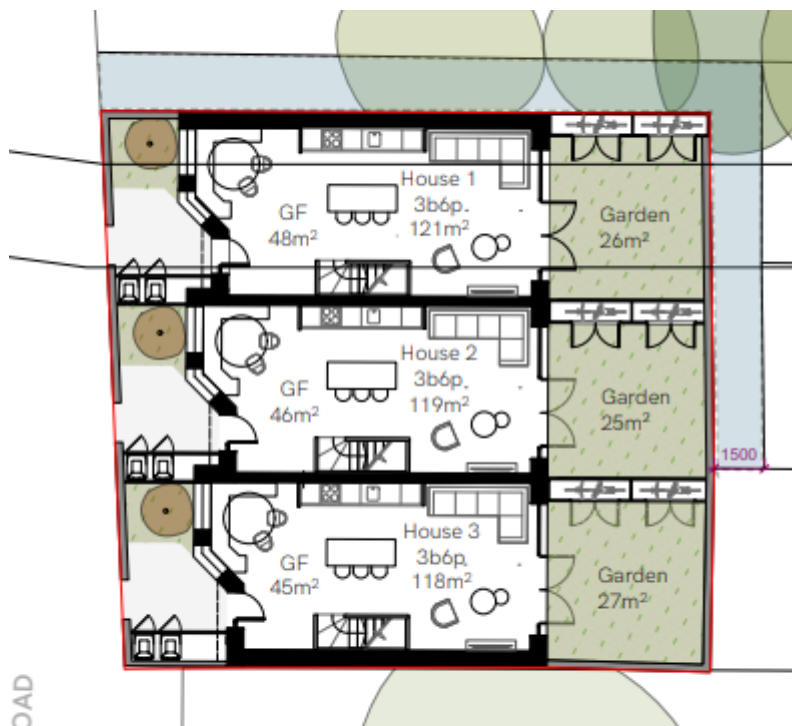
3.3 A schedule of the proposed residential accommodation is provided below:

Unit number	Unit type	GIA (sqm)	Private amenity (sqm)
1	3 bed / 4 person	90	21
2	3 bed / 4 person	90	21
3	3 bed / 4 person	90	24

#### Layout

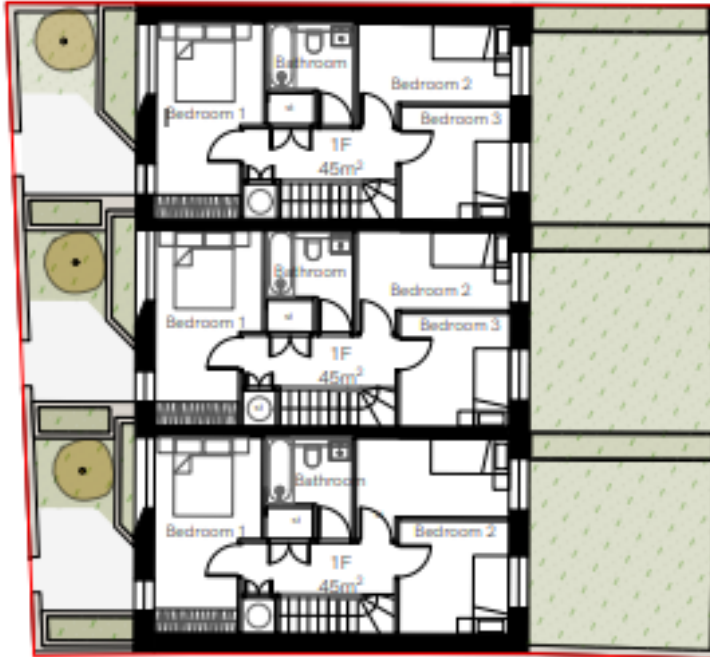
3.4 The proposal is for three family houses that have a contextual and contemporary design, following the residential vernacular and activating a backland site. Each property has its own private access at ground floor level with amenity space at the rear. All houses include a kitchen diner at ground floor and bedrooms on the upper floors. Plans overleaf show the proposed layout in further detail.

**Figure 2: Proposed Ground Floor Plan**





**Figure 3: Proposed First Floor Plan**



**Scale and massing**

3.5 The DAS sets out that the scale, mass, proportion and elevational detail of the proposal is derived from the established typology of the houses on Vicarage Park. The proposal is seen as a contemporary interpretation of these building types with recognisable form and detail, but with sufficient subtle difference such that it is not a pastiche of these buildings but a thoughtful reflection of them. The proportions of fenestration, roof form and overall composition have been developed in line with the proportions of existing houses, in-keeping with the character of the street. Thus seeking to complement the existing character of the area. The submitted DAS includes a detailed assessment of the design strategy and should be reviewed in full alongside this Planning Statement.

**Figure 4: CGI of the proposal**





### **Tenure**

- 3.6 The proposed houses will be for sale on the private market.

### **External appearance**

- 3.7 The houses will be finished in a red stock brickwork with mortar to match. The DAS sets out that the formal character and material qualities of the proposal and how it draws inspiration from the residential style along Vicarage Park; taking design cues from the rhythm of the street to provide good quality, sustainable homes.

### **Landscaping**

- 3.8 The scheme does result in the loss of two trees, although these are proposed to be removed following a tree works application (23/2480/TC). However new ones will replace this loss, with the proposed development seeking to positively contribute to the local ecology and enhance the site biodiversity.
- 3.9 Landscaped planting to the rear gardens will comprise native species rich in nectar, pollen and fruit resources. The proposals are to plant a number of grasses and wildflowers to attract pollinating insects and invertebrates, as well as the new trees.

### **Access and parking**

- 3.10 The development is proposed to be car free. A total of 6 secured cycle parking spaces (two for each house) are proposed to be provided in each garden, in line with London Plan policy 6.9 (Cycling).

### **Accessibility**

- 3.11 All units are compliant with Part M4(2).

### **Refuse and servicing**

- 3.12 A refuse storage area will be provided within the front garden of each house. The bin stores are to be screened from sight from the street with vegetation. The bin store is to be positioned with direct access from the pavement for collection and servicing is expected to take place on Vicarage Road in the same way as the rest of the street.

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## 4.0 Considerations

4.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are:

- Principle of development;
- Housing mix;
- Design and heritage;
- Impact on neighbouring residential amenity;
- Quality of accommodation;
- Transport and parking.

4.2 Each issue is considered below.

### **Principle of development**

4.3 Given the brownfield and accessible nature of the site, the principle of residential accommodation should be welcomed in planning terms. This is also directly in line with London Plan Policy H2 which specifically states that optimising housing at small sites (below 0.25 hectares) should be pro-actively supported to ‘significantly increase the contribution of small sites to meet London’s housing needs. This presumption in favour of development is further bolstered by London Plan Policy D3’s support for the efficient use of land, in proposals such as this which optimise site potential. Policy H(c) of the Greenwich Core Strategy requires residential development on backland and infill sites to fulfil certain criteria in order to be favourably considered.

4.4 Taking each criterion in turn:

- i. There is no unreasonable reduction in the amount of amenity space enjoyed by existing residents, especially for those in houses with the shared use of a garden

The rear gardens of 14-16 Vicarage Park are large. These gardens are some of the longest and most open in the terrace as most have been either subdivided, have large double garages, or are occupied by a car repair garage. The development will ensure each property will retain sizeable gardens of between 50 sqm and 66 sqm, each, similar to 18, 19 and 23 Vicarage Park. There will therefore be no unreasonable reduction to amenity space. The proposal would result in a wider choice of homes at this location by offering three homes accommodating 3 bedrooms that can be adapted to meet the demands of family life.

- ii. There is no unreasonable loss of privacy from overlooking adjacent houses and/or their back gardens (also see Policy DH(b))

The houses are located a minimum of 19.2m from the rear windows of the properties on Vicarage Park, which is considered an acceptable distance for a suburban backland site such as this. With regards to overlooking into neighbouring back gardens, high boundary treatments are proposed typical to gardens such as these, and so will protect residential privacy. Furthermore, the living spaces are all proposed on the ground floors of the properties to ensure the less sensitive rooms with regards to overlooking i.e. the bedrooms can be located across the upper floors. The bathrooms on the second floors will also have obscured glazing to further protect amenity.

- iii. There is no unreasonable increase in noise and disturbance from traffic gaining access

An increase of three family homes to the area is not considered to result in an unreasonable increase to noise levels from traffic. The proposed development does not provide car parking on site and so in the

first instance does not promote or encourage car use. Notwithstanding this, the adjacent estate has dedicated car parking areas and so there is considered to be ample capacity for on street parking in close proximity to the site as demonstrated by the parking survey that has been undertaken. The potential increase in the number of deliveries to the site is also not considered substantial enough to result in an increase to noise and disturbance to local residents however the full planning application will include trip generation data and a parking survey to demonstrate the development is acceptable from a highways perspective.

- iv. There is no significant loss of wildlife habitats, particularly trees or shrubs which would adversely affect the appearance and character of the area

The site currently appears to be relatively barren with a limited opportunities for wildlife to thrive and so the proposal will seek to create a verdant and diverse development that retains all trees on and around the site. The density proposed at just three houses ensures there will be adequate space on the site for comprehensive planting schemes that look to deliver biodiversity net gains in line with London Plan Policy G5.

- v. The character of the area is maintained with particular regard to the scale, design and density of the development.

The design of the three houses has been developed using local precedents and referring to the surrounding historic character and scale of the area. The houses are contemporary in their style but have traditional features that echo and complement the area. The site is not considered overdeveloped to the extent that it will dominate the landscape and the houses are sufficiently subservient in scale to their immediate surroundings following the reduction in scale from the pre-application stage. The suburban residential character of the area is therefore considered to be maintained from this small development. Further analysis on this issue is provided in the DAS and Heritage Impact Assessment. Overall, the principle of this backland development of this site is considered to be in line with local policy H(c) and therefore acceptable.

#### **Housing mix and tenure**

- 4.5 Local Plan Policy H2 requires developments to deliver a mix of housing types and sizes and contain a proportion of 3, 4 and 4+ bedroom units. The policy however acknowledges that the exact mix on site will depend on factors such as the location, character, and accessibility of a site. The delivery of three large family homes on the site is considered appropriate for the suburban context and will bring about significant planning benefits weighing strongly in favour of the development.
- 4.6 The delivery of three units does not trigger the policy requirement for affordable housing set out in Local Policy H3 and so all units are within a private tenure.

#### **Design, Height, Scale and Massing**

- 4.7 The proposed development comprises three houses that reflect the core design values set out within strategic and local plan policies, and are simple yet contemporary in their architectural language. The design of the proposal has been carefully considered to take account of the wider surrounding suburban context, whilst optimising the site's potential for much needed family housing through a design-led approach (in line with London Plan Policy D3). The proposed development has worked with the constraints of the site to maximise daylight within each unit and available open space and the use of high-quality consistent materials throughout help to create a clear sense of place. As noted in the DAS, the brick palette has been chosen to echo the surrounding context and character of the development. The brick responds positively to the adjacent residential buildings.
- 4.8 The development optimises the site in line with London Plan policy D3 which encourages development proposals to reinforce and enhance local context by delivering buildings and spaces that positively respond to local distinctiveness with due regard to existing and emerging street hierarchy, building types, forms and proportions, and delivers high quality family housing sensitive to the surrounding residential properties with regards to overlooking, daylight, and privacy.

- 4.9 The proposed materials also blend and complement the historic character of the area, with particular regard for The Old Vicarage, which is also finished in a light-coloured brick. The use of bay windows at the front of each house is a complementary architectural feature and gives the development visual interest. The DAS includes CGIs of the development from various angles around the site which demonstrate how the scale is appropriate and design has considered the local context. Overall, the proposed design is a high quality that enhances the appearance of the site and positively responds to the local context in terms of its scale, massing, and material palette in accordance with Local Policy H3 and DH1.
- 4.10 Overall, the proposed design, massing, layout, and material palette is considered appropriate for this sustainable site. This contemporary development is visually interesting and significantly improves the appearance of the site. The proposed development is therefore considered acceptable in accordance with relevant strategic and local policies.

### **Heritage**

- 4.11 The application is accompanied by a Heritage Impact Assessment (HIA by HCUK, which notes that the proposed new dwellings are considered of a high quality, architect-led design that draws on the key characteristics of the locality and, specifically, the key elements that contribute most positively to the character and appearance of the Plumstead Common Conservation Area. The HIA notes that at two storeys, the proposals have taken on board LPA comments during the pre-application stage and the scheme reflects the prevailing building heights within the area, as well as drawing on a sympathetic built form and a material palette that reflects the materiality of surrounding Victorian and Edwardian buildings. It is the conclusion of this HIA that the proposals will bring about a slight enhancement to the character and appearance of the conservation area for the purposes of Section 72 of the Planning (Listed Buildings and Conservation Areas Act). With respect to the two grade II listed buildings identified, the Old Vicarage and its associated railings and gate piers, no harm has been with the two designated heritage assets will be appreciable in just the same way as they are currently, once the new dwellings have been introduced. The proposed development is considered to enhance the character of the conservation area and is in line with local policy.

### **Impact on neighbouring residential amenity**

- 4.12 The constrained nature and location of the site means that due care has been taken regarding the potential impact of the development on the surrounding residential properties. Local Policy DH(b) has been considered and the development designed to ensure it does not cause an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight, or privacy they enjoy, or result in an unneighbourly sense of enclosure.
- 4.13 The scheme has been designed to ensure protection of neighbouring residential amenity and a high degree of compliance with local policy. A distance of 19m has been retained from the development to the rear windows of the properties on Vicarage Park. Although a small site, these distances are considered sufficient to mitigate overlooking between buildings and considered on balance acceptable for the backland nature of the site. Furthermore, the main living accommodation has been located on the ground floors of the properties where boundary fences will prevent any direct overlooking.
- 4.14 The DAS clearly sets out that the precise positioning of the proposed building footprint has been carefully considered to minimise impact in terms of daylight/sunlight, privacy and sense of enclosure.

### **Quality of accommodation**

- 4.15 Local Policy DH1 and H5 expect residential development to achieve a high quality of design that is consistent with the guidance set out in the Housing SPG. The supporting text of Policy H5 requires a minimum garden area of 50sqm to be provided in houses with up to three bedrooms. All units comply with national space standards, have been designed to meet London Plan space standards, and all are dual aspect. With regards to private amenity space, the houses fall short of local requirements, however this is not considered to compromise the overall quality of the accommodation. The provision of 21-24 sqm gardens is sufficient to ensure all residents have good access to quality outdoor space. Furthermore, Plumstead Common and Nature Reserve is just a 2-minute walk from the site which provides residents with larger open space. Internally, the main living/kitchen/diners are located on the

ground floors and face directly out onto the private gardens via large French doors, ensuring these well-used rooms receive generous daylight and sunlight provision.

- 4.16 The quality of accommodation proposed on this site is considered to accord with the requirements set out by local and strategic policy
- 4.17 The submitted DAS provides further analysis on the quality of accommodation.
- 4.18 Overall, it is considered that the proposed dwellings on this constrained site provide a very high standard of residential accommodation, which should be considered a merit in the planning balance.

#### **Highways, Transport and parking**

- 4.19 The application is accompanied by a Transport Statement (TS) and Parking Survey by TTC, which should be reviewed in full.
- 4.20 The TS sets out that pedestrian access to the development site will be provided via the existing dropped kerb access from Vicarage Road. The development will be car-free and cycle parking is proposed in line with the London Plan standards.
- 4.21 The TS confirms the site is located within a sustainable location with multiple bus and train services as well as adequate local walking and cycling infrastructure. It also considers the appropriateness of a car-free development on the site. In order to establish the proposed development's effect on the local parking network, an independent parking survey in accordance with the relevant methodology was carried out within a 200m radius of the site. The parking survey results confirmed sufficient capacity on street of between 26 and 31 available spaces to accommodate the anticipated parking demand of two spaces in accordance with London Plan standards. Highways officers have queried the validity of the survey noting one if the surveys was undertaken on a Monday. However, this is in accordance with the Lambeth Methodology and can be relied upon as robust.
- 4.22 A dedicated secure bike store for 2 bikes per house will be located within the frontage of each home. Dedicated waste storage is also provided in close proximity to and easy access from the adopted highway, and is also on the exit route from the properties for the convenience of future residents (see the DAS for further detail). The proposed development will have minimal traffic impact on the operation of the local transport or highway networks or highway safety, in accordance with the requirements of the NPPF.

#### **Trees**

- 4.23 The application is accompanied by a tree survey and arboricultural impact assessment by Arborclimb consultants, which shows that two of the surveyed trees will be removed, although it is noted that both are proposed to be removed regardless of any development proposals following the approval of a tree works application (23/2480/TC). In designing the site layout, the northern facade has been specifically set back from the northern boundary line. This then allows for greater building separation space given the close proximity of the off-site trees in this location. All residual constraints from retained trees have then been shown as managed via a combination of building design and routine crown and root pruning. Mitigation is proposed in the form of replacement tree planting. Overall, it is the conclusion of the arboricultural report that given the details and best practice methodology set out, an additional AMS is not required and has therefore not been considered further beyond the best practice methodology detailed.

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## 5.0 Conclusions

- 5.1 The proposal has been assessed against all of the relevant adopted and emerging planning policies and guidance. Pre-application engagement discussions with Officers at the Council have been undertaken and Officers confirmed their support for the principle of the proposed development. The proposal has been amended in line with officer feedback.

### **Benefits of the proposal**

- 5.2 The key benefits the proposal delivers are:
- Delivery of residential accommodation on a small sustainable brownfield site which is specifically advocated in the adopted London Plan and the Local Plan;
  - Provision of much needed family housing;
  - The development of three high quality new family homes in a sustainable location;
  - A high quality architectural response that will provide an enhancement to the character and appearance of the conservation area; and
  - Opportunities for enhancing the sustainability and biodiversity credentials of the site through the use of native landscaping and energy efficient materials.
- 5.3 The proposal complies with Section 38(6) of the Planning Compulsory Purchase Act 2004 which states the determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.4 This Planning Statement has demonstrated that the proposals are in accordance with the development plan. Without prejudice to this, if conflicts with policy were judged to occur, the range of benefits highlighted above are deemed to significantly weigh in favour of justifying the conflicts. It is therefore considered that planning permission should be granted.