

Development Management Delegated Report



**Directorate of Regeneration,
Enterprise & Skills**
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

Case Ref No:	21/1067/F
Application Type:	Full Planning Permission
Location:	WHITE HORSE, 704 WOOLWICH ROAD, GREENWICH, LONDON, SE7 8LQ
Ward:	WOOLWICH RIVERSIDE
Proposal:	Change of use from Hotel (Class C1) to a House in Multiple Occupation for up to 22 persons (Sui Generis), retention of Bar/Restaurant on ground and lower ground floor with associated refuse/recycling storage and cycle parking.

Recommendation	Approve		
Expiry Date	19/05/2021	EOT	22/10/2021

Case Officer	Joe Higgins	Date:	21 October 2021
Report Agreed By		Date:	
Authorising Officer's Signature		Date:	

Listed Building:	<u>No</u>	Flood Zone	Existing Watercourse
Conservation Area:	THAMES BARRIER & BOWATER ROAD		
CIL Liable	<u>Yes</u>	LDD	London Development Database

Site Notice	12/04/2021				
Press Notice	21/04/2021				
Objections	0	Support	0	Comments	1

Site Description

The application site comprises of a 3 storey Public House that is situated on the south side of Woolwich Road at the junction with Cleveley Close. To the west of the site is a former tyre repair workshop (Penhall Tyres) that is currently being redeveloped into a part 4, part 5 storey mixed use development (14/0289/F) which is still under construction. To the south east of the site is a 4 storey block of flats that is situated at a higher land level to the public house. The application site is located within the Thames Water and Bowater Road Conservation Area. The area is subject to an Article 4 Direction removing the permitted development right for conversion of C3 dwellinghouses to C4 HMOs.

The ground floor of the building is in use as a public house whilst the upper floors provide bed and breakfast accommodation consisting of 11 rooms.

The building is locally listed, and the listing reads as follows:

704 'White Horse' Public House

Age and History - Early 18C origins as a beer house, rebuilt 1897, still in use as a pub. Design - Three storey with gable roof and gabled dormers, perpendicular double gable roof to rear, commercial ground floor with accommodation above Materials - Red brick with stucco detailing, shopfront with timber joinery and red and grey granite features, timber casement windows Features - Symmetrical principal elevation of four bays articulated by granite and brick pilasters with stucco banding. Large mullioned and transomed windows with moulded architrave surrounds or with triangular or segmental pedimented heads. Twin Dutch gabled dormers with lettering 'REBUILT 1897'. Ornate shopfront with polished grey granite stall riser and red granite pilasters surmounted by composite capitals and decorative bands. Semi-circular fanlights to windows and entrances with decorative engraved glass spandrels below ornate ventilation grill. Decorative façade continues round east elevation, surmounted by large decorative gable and chimney stack. Western gable plain. Degree of Alteration - Windows replaced Significance - Distinguished local landmark with fine neoclassical detailing. Only surviving historic pub still in use on this stretch of Woolwich Road. Positive contributor building with high townscape value in Thames Barrier & Bowater Road Conservation Area Qualifying criteria: Architectural Interest: i) sole-surviving example ii) substantially intact example Environmental Significance: i) characterful, time-honoured locally valued feature

Relevant Planning History

14/0507/F - Demolition of the public house and redevelopment to provide a 6 storey building to contain 9 flats comprising of 4 x1, 4x 2 and 1 x3 bed flats, together with 8 car parking spaces. **Refused 28th May 2014.**

14/2402/F - Demolition of existing public house and the construction of a 6 storey building containing 9 flats comprising 4x1 bed 4x2 bed and 1x3 bed with 8 parking spaces on the ground level. **Refused 13th November 2014**

18/2735/F - Construction of a two storey rear extension at first and second floor with roof terrace at third floor, roof extension to create additional storey, retention of Pub on ground floor and change of use of upper floors from Hotel (Class C1) to 14 room HMO (Class Sui Generis). **Refused 24th October 2018. Appeal ref: APP/E5330/W/18/3217116 turned away by the Planning Inspector 02/05/2019.**

Refusal reasons:

- 1) The proposed construction of a two storey rear extension at first and second floor and roof extension to create an additional storey and terrace by reason of its design, scale and massing, would constitute an overly dominant and intrusive feature that would appear as an prominent, incongruous development that would harm the prevailing character of the public house and Thames Barrier and Bowater Road Conservation Area.*
- 2) The proposal fails to demonstrate that sufficient cycle and waste/ recycling storage can be provided on site.*
- 3) The proposed development would overlook the upper floor (north facing windows) of 2-23 Cleveley Close causing an unacceptable loss of privacy which would be materially harmful to the living conditions of occupants.*
- 4) The proposed development, by reason of its scale and bulk and relationship to the neighbouring property would have a detrimental impact on the residential amenity of occupiers of the adjoining property to the south (2-23 Cleveley Close) appearing dominant when viewed from this property resulting in an un-neighbourly sense of enclosure.*

19/0905/F - Construction of a two storey rear extension at first and second floor with roof terrace at third floor, roof extension to create additional storey, retention of Pub on ground floor and change of use of upper floors from Hotel (Class C1) to 14 room HMO (Class Sui Generis). **Refused 1st July 2019, Appeal ref: APP/E5330/W/19/3234727 dismissed 25/11/2019.**

Refusal Reasons:

- 1) The proposed construction of a two storey rear extension at first and second floor and roof extension to create an additional storey and terrace by reason of its design, scale and massing, would constitute an overly dominant and intrusive feature that would appear as a prominent, incongruous development that would harm the prevailing character of the locally listed building and Thames Barrier and Bowater Road Conservation Area.*
- 2) The proposed HMO, by virtue of its provision of under-sized and sub-standard self-contained rooms with poor access to natural daylight and outlook, together with the insufficient information submitted regarding internal floor-to-ceiling heights for the development as a whole, would provide an unsatisfactory standard of residential accommodation for future occupiers.*
- 3) The proposed refuse and recycling provision would be insufficient to meet the needs of the development and would lead to bins being stored on the highway which would obstruct safe and unimpeded access for pedestrians along this section of Cleveley Close.*

- 4) *The proposal fails to demonstrate that sufficient secure and dry cycle parking can be provided on site.*

19/2047/F - Construction of a two storey rear extension at first and second floor with roof terrace at third floor, roof extension to create additional storey, retention of Pub on ground floor and change of use of upper floors from Hotel (Class C1) to 14 room HMO (Class Sui Generis). **Refused 30/08/2019. Appeal ref: APP/E5330/W/19/3236640 dismissed 24/12/2019.**

Refusal Reasons:

- 1. The proposed construction of a two storey rear extension at first and second floor and roof extension to create an additional storey and terrace by reason of their design, scale and massing, would constitute an overly dominant and intrusive feature that would appear as a prominent, incongruous development that would harm the prevailing character of the locally listed building and Thames Barrier and Bowater Road Conservation Area. As such, the proposal is contrary to Policies 7.4, 7.6 and 7.8 of the London Plan (2016) and Policies DH1, DH3, DH(h) and DH(j) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*
- 2. The proposal fails to demonstrate that sufficient cycle and waste/recycling storage can be adequately provided on site, leading to bins and cycle storage being stored on the highway prejudicing the safe and free flow of pedestrian traffic. As such, the proposal is contrary to Policies 5.16, 6.9 and 6.10 of the London Plan (2016) and Policies DH1 and IM(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).*

20/0471/F - Change of use of upper floors from Hotel (Class C1) to a large 15 room HMO (Sui Generis), incorporating a roof extension to 3rd floor loft space, retention of Pub on ground floor, replacement of windows from single glazing to double glazing, with associated cycle parking and bin storage. **Refused 14/05/2020.**

Refusal Reasons:

- The proposed roof infill extension would be an overly dominant addition which would obliterate the original historic roof form of the host property and the proposed replacement pub windows by reason of their thicker frames and general design would be unsympathetic replacements. As such the proposed development would fail to preserve the character and appearance of the locally listed host building and the wider Thames Barrier and Bowater Road Conservation Area, contrary to Policies 7.4, 7.6 and 7.8 of the London Plan (2016) and Policies DH1, DH3, DH(h) and DH(j) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
- The proposed HMO, by virtue of the inadequate and poorly located communal kitchen facilities, and the lack of outlook which would be provided to HMO rooms 12, 13 and 14 as well as the insufficient information submitted regarding internal floor-to-ceiling heights for the development as a whole, would provide an unsatisfactory standard of HMO accommodation for future occupiers, contrary to Policy 3.5 of the London Plan (2016), Policies DH1 and H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), the Mayors Housing SPG (2016), the Residential Extensions,

Basements and Conversions Guidance Supplementary Planning Document (December 2018) and the Royal Borough of Greenwich Standards for Houses in Multiple Occupation (2018).

3. The proposed self-contained HMO room G1 within the ground floor would provide cramped substandard internal living space and inadequate privacy, and would therefore provide future occupiers with an unacceptable standard of self-contained accommodation, contrary to Policy 3.5 of the London Plan (2016), Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), the Mayors Housing SPG (2016) and the Residential Extensions, Basements and Conversions Guidance Supplementary Planning Document (December 2018)
4. The proposal fails to demonstrate that adequate commercial waste/recycling storage for the proposed A4 unit can be provided within the site leading to bins being placed on the adjacent highway which would hinder the safe and free passage of pedestrians. As such, the proposal is contrary to Policies 5.16, 6.9 and 6.10 of the London Plan (2016) and Policies DH1 and IM(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
5. The proposed car parking spaces on highway land along Cleveley Close and on the corner of a junction would not benefit from a vehicle crossover and as such vehicles accessing and leaving the spaces would hinder the free and safe passage of pedestrians and cause conflict with other road users, contrary to Policies 6.10, 6.11 and 6.13 of the London Plan (2016) and Policies IM4 and IM(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
6. The proposal fails to demonstrate that sufficient secure, dry and accessible cycle parking could be adequately provided on site. As such, the proposal fails to promote a sustainable mode of travel and is contrary to Policy 6.9 of the London Plan (2016) and Policies IM4 and IM(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).
7. Due to the inaccuracies and inconsistencies present in the submitted drawings regarding projections from the rear elevation of the building and existing and proposed fenestration and chimney details, it has not been possible to make a proper and accurate assessment of the proposal against the relevant policies of the London Plan (2016) and the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Description of proposal

The proposal is for the change of use from Hotel (Class C1) to a House in Multiple Occupation for up to 22 persons (Sui Generis), retention of Bar/Restaurant on ground and lower ground floor with associated refuse/recycling storage and cycle parking.

Consultation:

Neighbour and Ward Councillor Notification
Ward Councillors were notified on 12 th April 2021.

38 neighbouring properties were notified on 12th April 2021.

A site notice was displayed at the site 12th April 2021.

A press notice was run on 21st April 2021.

No response received.

Internal Consultation Responses

Highways and Transport	Given the good access to public transport and the overall similarity of the previous use, on balance no highway objection is raised.
Environmental Health	No response received.
Conservation Officer	No response received.
Waste Services	<i>The residential waste (HMO) should be stored separately from commercial waste. Also there should be enough space in the bin store to remove the bins from one waste stream without having to move the bins from a different waste stream. They HMO should have 2x1100L bins for general waste, 2x1100L bin for recycling and 1x500L for food waste.</i>
HMO Team	No response received.

External Consultation Responses

Charlton Society	No response received.
Charlton Central Residents Association	No response received.

Relevant Planning Policies

NPPF 2019

- Chapter 6 Building a strong and competitive economy
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well designed spaces
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving historic environment

The London Plan (2021)

- Policy D3 Optimising site capacity through the design led approach
- Policy D4 Delivering good design
- Policy D6 Housing Quality and Standards
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise

Policy HC1	Heritage conservation and growth
Policy HC7	Protecting public houses
Policy H9	Ensuring the best use of stock
Policy SI 7	Reducing waste and supporting the circular economy
Policy SI 8	Waste Capacity and Net Waste Self Sufficiency
Policy T2	Healthy Streets
Policy T4	Assessing and Mitigating Transport Impacts
Policy T5	Cycling
Policy T6	Car Parking
Policy T6.1	Residential Parking

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

Policy EA(b)	Pubs
Policy H2	Housing mix
Policy H5	Housing Design
Policy DH1	Design
Policy DH3	Heritage Assets
Policy DH(b)	Protection of Amenity of Adjacent Occupiers
Policy DH(h)	Conservation Areas
Policy DH(j)	Locally Listed Buildings
Policy E1	Carbon Emissions
Policy EA5	Tourism
Policy E(a)	Pollution
Policy E(c)	Air Pollution
Policy IM1	Infrastructure
Policy IM4	Sustainable Travel
Policy IM(b)	Walking and Cycling
Policy IM(c)	Parking Standards

Supplementary Planning Guidance:

Residential Extensions, Basements and Conversions Guidance Supplementary Planning Document (December 2018)

The Technical Housing Standards – nationally describe space standard (March 2015);

Mayors Housing SPG (2016)

The Royal Borough of Greenwich Standards for Houses in Multiple Occupation (2018)

Material Planning Considerations

This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered:

8. Principle of development;
 - Design, Character, Appearance And Impact On The Locally Listed Building
 - Quality of living environment provided for future residents;

- Residential Amenity;
- Sustainability and Energy;
- Access and Inclusive living environment
- Highways;
- Community Infrastructure Levy (CIL);

Principle of development

At the heart of NPPF, London Plan policy and the Council's Core Strategy policy is the delivery of sustainable development. National policy promotes the bringing forward of sufficient land of a sustainable quality and in appropriate locations to meet the needs of housing, industrial, retail and commercial development.

Loss of hotel accommodation (Use class C1)

Policy EA5 Tourism states that The Royal Borough will support the expansion and diversification of Royal Greenwich's tourism industry. Paragraph 4.2.22 of Policy EA5 states that the provision of hotel accommodation within town centres and the waterfront area will increase visitor spending, helping to maximise the benefits of Royal Greenwich's tourism industry. There is no policy objection to the loss of the C1 hotel because the site is not located within a town centre location and is not considered vital for the delivery of tourism and visitor infrastructure.

Provision of new HMO accommodation

Policy H9 of the London Plan (2021) sets out that boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic housing needs. Policy H9 clearly states that where HMOs are of a reasonable standard they should generally be protected.

The proposed development would provide 11 HMO rooms and there is no in principle objection to the provision of additional HMO accommodation as it is supported by Policy H9, subject to satisfactory living conditions being provided which will be assessed later on in this report.

Retention of A4 Public House

The proposal would involve alterations to the internal layout of the existing Public House on the site at ground floor and lower ground floor levels.

Paragraph 8 of the NPPF states that: There are three dimensions to sustainable development: economic, social, and environmental. These dimensions give rise to the need for the planning system to perform a number of roles, including a social role - supporting strong, vibrant and healthy communities, by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

Policy HC7 of the London Plan states that Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused

unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.

Policy EA(b) of the Core Strategy (2014) seeks the retention of pubs that have a community role and will resist the change of use or demolition except where continued use as a pub is no longer economically viable and where evidence of 2 years of marketing demonstrates that it is not reasonable capable of being made viable. There is a presumption to protect public houses within the borough and the council would welcome refurbishments to improve its viability.

The existing Public House is not currently operating; however, officers consider it to be a valuable community asset. The proposal would result in no significant reduction in A4 floor space and it is not considered that the proposal would harm the viability of the existing pub. Therefore, the proposal complies with Paragraph 8 of the NPPF and Policy EA(b) of the RBG Core Strategy (2014).

Design, Character and appearance, and impact on the Locally Listed Building and Conservation Area

As set out elsewhere within this report, the site is located within the Thames Barrier and Bowater Road Conservation Area and the host building is locally listed.

Paragraph 193 of the NPPF (2019) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 194 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

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

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

Policy D3 of the London Plan states that development proposals should make the best use of land by following a design-led approach that optimises the capacity of sites. Furthermore, development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. Finally, development should respond to the existing character of a place, be of a high quality and achieve safe, secure and inclusive environments. Policy D4 of the

London Plan sets out the tools available to Local Planning Authorities to achieve the aims of Policy D3, but it is acknowledged that the use of these tools needs to be proportionate to the scale of development proposed.

Policy DH1 of the Core Strategy requires all developments to be of a high quality of design and demonstrate that they positively contribute to the improvement of both the built and natural environments. Policy H5 of the Core Strategy states that 'new residential development will be expected to achieve a high quality of housing design and an integrated environment. The Royal Borough will take into account the key relationship between the character of the area, site location and housing densities.

Policy DH(j) of the Core strategy states that in considering proposals affecting buildings on the Local List of Buildings of Architectural or Historic Interest, substantial weight will be given to protecting and conserving the particular characteristics that account for their designation. The application property is locally listed and the listing is copied in below:

704 'White Horse' Public House Age and History - Early 18C origins as a beer house, rebuilt 1897, still in use as a pub. Design - Three storey with gable roof and gabled dormers, perpendicular double gable roof to rear, commercial ground floor with accommodation above Materials - Red brick with stucco detailing, shopfront with timber joinery and red and grey granite features, timber casement windows Features - Symmetrical principal elevation of four bays articulated by granite and brick pilasters with stucco banding. Large mullioned and transomed windows with moulded architrave surrounds or with triangular or segmental pedimented heads. Twin Dutch gabled dormers with lettering 'REBUILT 1897'. Ornate shopfront with polished grey granite stall riser and red granite pilasters surmounted by composite capitals and decorative bands. Semi-circular fanlights to windows and entrances with decorative engraved glass spandrels below ornate ventilation grill. Decorative façade continues round east elevation, surmounted by large decorative gable and chimney stack. Western gable plain. Degree of Alteration - Windows replaced Significance - Distinguished local landmark with fine neoclassical detailing. Only surviving historic pub still in use on this stretch of Woolwich Road. Positive contributor building with high townscape value in Thames Barrier & Bowater Road Conservation Area Qualifying criteria: Architectural Interest: i) sole-surviving example ii) substantially intact example Environmental Significance: i) characterful, time-honoured locally valued feature

The only alterations to the locally listed host building are the installation of 7 rooflights in the main roof of the building and insertion of new door to provide access to the communal cycle store as well as replacement of the entrance doors to the pub fronting Woolwich Road.

The proposed rooflights would be discreet features on the roof slope and would not be easily visible from the public realm. The insertion of a door in the side elevation and the alterations to the pub doors would be minor alterations to the building which would not significantly alter the character of the building overall.

Overall, the proposed development would lead to less than substantial harm to the

locally listed building and wider conservation area. As heritage assets are irreplaceable, any harm requires clear and convincing justification, which has not been provided. The benefits of the proposal include the provision of HMO accommodation on the site and the restoration of reactivation of the pub at ground floor and these benefits are considered to outweigh the harm to the heritage asset identified above.

The proposal is considered to be in accordance with the NPPF 2019, Policies D3, D4 and HC1 of the London Plan (2021) and Policies DH1, DH3, DH(h) and DH(j) of the Core Strategy and Detailed Policies (2014).

Quality of accommodation

Paragraph 8.2 of the Residential Extensions, Basements and Conversions Guidance Supplementary Planning Document (December 2018) states that HMOs are a form of non-self-contained accommodation and generally include a private bedroom with shared living/amenity facilities. Proposals that include self-contained accommodation (where neither kitchen or bathroom facilities are shared), regardless of whether or not additional communal/amenity space is provided, are considered as self-contained accommodation and must therefore comply with the minimum space standards for dwellings set out in Policy 3.5 of the London Plan.

This is supported by LP Policy D6 which states that housing developments should be of high-quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. The policy goes on to state that the design of development should maximise the provision of dual aspect dwellings and provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context.

Paragraph 8.7 of the Residential Extensions, Basements and Conversions Guidance SPD (December 2018) states that to be considered good quality, proposals for conversion to an HMO will need to:

- provide sufficient internal space
- provide occupants with a reasonable standard of amenity
- not give rise to significant adverse amenity impacts to the surrounding properties/residential neighbourhood

Paragraph 8.8 of the SPD guidance states that the Royal Borough's Standards for HMOs were adopted in 2018. These set out detailed amenity standards as well as additional further requirements relating to the management of the HMO. In all cases, applicants are advised to refer directly to the Standards for HMOs when developing proposals to ensure that they will comply with the licensing requirements.

Eleven (11) HMO rooms would be provided which would not feature private kitchen facilities.

Table 1 of the RBG Standards for HMOs (2018) states that single and double HMO rooms without kitchen facilities should have a minimum floor area of 9m² and 12m² respectively. Section 2.4 of the RBG Standards for HMOs (2018) states that it is expected that all rooms will have a minimum ceiling height of 2.1m over at least half the floor area.

Table 5 of the Greenwich Standards for HMOs requires states the minimum internal space required within shared kitchens per number of occupants.

Rooms				
Bedroom	Occupants	Size (sqm)	Standard (sqm)	Complies
1	2	21	12	Yes
2	2	20	12	Yes
3	2	14.3	9	Yes
4	2	15.25	12	Yes
5	2	14	12	Yes
6	2	13.8	12	Yes
7	2	19.3	12	Yes
8	2	13.2	12	Yes
9	2	22.9	12	Yes
10	2	26.9	12	Yes
11	2	30.8	12	Yes
GF Kitchen	10	15.95	14.5	Yes
1st Floor Kitchen	5	9.51	9.5	Yes
3rd Floor Kitchen	7	12.34	11.5	Yes

The table above confirms that the HMO rooms and shared facilities would meeting the minimum internal space standards of the Residential Extensions, Basements and Conversions SPD (2018) and the RBG Standards for HMOs (2018).

All of the HMO rooms would feature private en-suite bathrooms which is acceptable. One communal W/C would be provided at first floor level.

Daylight, outlook and privacy

Standard 29 of the London Plan Housing SPG (2016) states that developments should minimise the number of single aspect dwellings. Standard 32 of the SPG states that all homes should provide for direct sunlight to enter at least one habitable room for part of the day. Standard 28 of the SPG states that Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other

public spaces.

HMO rooms 7 and 8 would be single aspect north facing, however this is considered to be acceptable because the future occupiers would have the benefit of use of other communal amenity space within the site. Rooms 11 within the converted roof space would have no windows and would only be served by rooflights which would be acceptable in this instance as the room is served by several rooflights and the future occupiers would have the benefit of use of other communal amenity space within the site.

HMO room 1 would be overlooked from the first floor courtyard however this could be mitigated by screening up to 1.7m above external ground level, which would reduce outlook, however the future occupiers of this room would have access to additional amenity space within the building which mitigates the reduced outlook this room would receive.

In summary, the proposed development would provide an acceptable standard of HMO accommodation for future occupiers.

Neighbouring Amenity

Policy DH(b) of the adopted Core Strategy confirms that developments will only be permitted where it can be demonstrated that the proposal does not cause an unacceptable loss of amenity to adjacent occupiers. Policy E(a) states that planning permission will not normally be granted where a development would have a significant adverse effect on the amenities of the adjacent occupiers. This is supported by policy D14 of the London Plan.

No increase in the footprint of the building is proposed and no new openings therefore the development would not result in loss of natural light, outlook or privacy for future occupiers.

In terms of noise and disturbance given the existing use as a hotel, the noise generation from the change of use would not be over and above that when it was operating a hotel. Officers consider the development would be compliant of policy regarding noise pollution.

The proposed development is considered to comply with Policy D14 of the London Plan and Policies DH(b) and E(a) of the RBG Core Strategy 2014.

Noise and Air Quality

Policy SI1 of the London Plan (2021) requires that development proposals should minimise increase exposure to existing poor air quality; promote sustainable design and construction methods to reduce emissions from demolition and construction; be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality; and reduce emissions from a development, on-site where feasible. London

Plan policy D14 seeks to protect users of developments from unacceptable noise exposure through appropriate mitigation measures.

Policy E(a) of the Core Strategy (2014) states that Housing or other sensitive uses will not normally be permitted on sites adjacent to existing problem uses, unless ameliorating measures can reasonably be taken. Policy E(c) further states that development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to minimise the impact of air pollutants are included.

The development includes HMO accommodation above a public house and to avoid noise breakout from the pub harming the amenity of the HMO occupiers, details of sound insulation has been recommended as a condition.

The development would be sited adjacent to Woolwich Road which is a busy dual carriageway however noise and air quality associated with the adjacent highway would not result in an unacceptable residential environment as it is noted that the site is set back from the carriageway and sited at first floor level, and further details of mitigation measures are not considered necessary.

Access and Inclusive living environment

London Plan Policy D7 requires developments to be designed so that they provide an inclusive environment for all members of society. Core Strategy Policy H5 supports the principles of inclusive living environment and Policy DH1 also states that all new developments should achieve accessible and inclusive environments.

As the proposal is a conversion of a historic building and no step-free access is provided to the proposed HMO accommodation, which is located at first floor level, the proposal would not be fully accessible to all members of society however this is considered to be acceptable in this instance given the constraints of the site.

Waste and recycling storage

Core Strategy Policy DH1 and H5 identifies that development needs to minimise the production of waste, to promote the reuse and recycling of waste materials and to ensure that waste disposal is environmentally responsible in order to achieve a high quality development. This is supported by London Plan Policy SI 8 of the London Plan.

The proposed residential and commercial waste storage arrangements have been amended to store both waste streams separately and this is now acceptable.

Highways & Transport

Car Parking and Access

London Plan Policies T6 and T6.1 requires the maximum standards in Table 10.3 to be applied. Core Strategy Policy IM(c) states that developments must provide the minimum level of car parking provision necessary as set out in the London Plan.

Core Strategy Policy IM(c) states that developments must provide the minimum level of car parking provision necessary as set out in the London Plan. Developments supported by a high level of public transport accessibility and within Controlled parking Zones (CPZ) should be car free.

The site is located within an area with a PTAL rating of 3 (Moderate), and no additional parking is proposed on site.

The Council's Transport and Highways Officer has raised no objection to the principle of a car free development. There is no CPZ in force on the surrounding roads, however given the commercial nature of the area, parking is restricted by yellow lines or vehicular access to roads is restricted by barriers. Woolwich Dockyard rail station is a 10-minute walk away and Woolwich Road is well served by bus routes. Had the application been considered acceptable, a condition would have been added restricting the development to be car free.

Cycle Parking

London Plan Policy T5 states that developments should provide secure, integrated and accessible cycle parking facilities in line with the minimum standards set out in Table 10.2 and the proposed development would need to provide 5 cycle parking spaces on site.

Core Strategy Policy IM(c) states that developments must meet, as a minimum, the standards for cycle parking as set out in the London Plan.

There are no minimum standards for cycle parking provision of large HMOs (Sui Generis) however it is considered that Policy T5 requires a large HMOs to provide a reasonable provision relative to the number of occupants. In this instance the number of occupants of the HMO would be up to 22 however the number of cycle parking spaces is likely to be limited by the available space within the site. It is stated above that the proposed residential cycle store accessed from Cleveley Close The plans show storage space for 11 cycles which is considered to be acceptable provision as it is unlikely that all HMO rooms would be in double occupancy. Access to the cycle parking would not be step-free but there is no other alternative location for this storage.

In summary the highways and transport impacts of the development would be acceptable, in accordance with Policies T5, T6 and T6.1 of the London Plan (2021) and Policies DH1, IM4, IM(b) and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Community Infrastructure Level (CIL)

Mayoral Community Infrastructure Levy

The development would be liable for the Mayoral Community Infrastructure Levy (CIL2). However, as no additional floorspace would be proposed, there would be no chargeable floorspace.

Royal Borough of Greenwich Community Infrastructure Levy

The development would be liable for RBG Community Infrastructure Levy. However, as no additional floorspace would be proposed, there would be no chargeable floorspace.

Recommendation

It is recommended that planning permission is **GRANTED** subject to the conditions in the attached decision notice.