



Development Management Delegated Report

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

Case Ref No:	22/2746/F
Application Type:	Full Planning Permission
Location:	WHITE SWAN, 22 THE VILLAGE, CHARLTON, LONDON, SE7 8UD
Ward:	CHARLTON VILLAGE & RIVERSIDE
Proposal:	Change of Use of first-floor from Public House (Sui Generis) to 2x2 bedroom residential units (Use Class C3) and associated works

Recommendation	Refuse		
Expiry Date	12/10/2022	EOT	09/03/2023

Case Officer	Brendan Meade	Date:	09 March 2023
Report Agreed By		Date:	
Authorising Officer's Signature		Date:	

Listed Building:	<u>No</u>	Flood Zone	Main Sewer
Conservation Area:	CHARLTON VILLAGE		
CIL Liable	<u>No</u>	LDD	London Development Database

Site Notice	16/09/2022		
Press Notice	14/09/2022		
Objections	161	Support	1
Comments		Comments	1

Site Description

The application site is located on the southern side of The Village and comprises of a two-storey public house with a basement and exhibits a frontage to Torrance Close to the rear. The building itself appears as an historic public house with a period external appearance and rear beer garden, rear service yard and side access driveway. The rear of the site obtained planning permission for a single-storey, three-bedroom dwelling under application ref: 19/2600/F. The building was listed as an Asset of Community Value on the 13th July 2020.

The application specifically relates to the upper floor of the property which is currently access internal as well as via an external stairway to the rear. As confirmed by the viability statement submitted as part of application 19/2600/F, this area contained function space including a cocktail bar associated with the Public House arranged over three rooms.

It should however be noted that under application 12/0117/F the upper floors were approved a change of use from managers accommodation to a hotel (Use class C1) provided eight rooms although this does not appear to have been implemented (application reference: 12/0117/F), and this consent has lapsed.

Officers noted from a site visit that the upper floor is no longer arranged as a function room and cocktail bar. It also appears that the site has been occupied by squatters although not official to planning enforcement has been raised with this regard.

The surrounding area is mixed-use in character consisting of ground level commercial premises front The Village with residential accommodation above. The surrounding streets comprise of terraced dwellings and flatted developments. This part of the village comprises a local centre frontage. The site is not within a flood risk zone and has a PTAL rating of 4.

The site sits within the Charlton Village Conservation Area however the site does not comprise of or sit adjacent to any statutory locally listed buildings.

On the 12th January 2023 the Council began the consultation on the proposed local heritage listing of the building. The consultation for this ended on the 30th January with the proposal to locally list the building still in the consultation stage at the time of writing this report.

Proposed Development:

Planning permission is sought for the change of Use of first-floor from Public House (Sui Generis) to 2x2 bedroom residential units (Use Class C3) and associated works.

The proposed development does not bring forward any external enlargements to the existing building with existing alterations limited to the removal of a flue to the rear, painting of the building and the replacement of the windows.

The entrance to the proposed units would be via an existing front door through an area that is proposed to be portioned off from the rest of the public house. This area to the front of the ground floor would also be the location for the proposed cycle and bin storage. As a result, some of the ground floor of the public house would also be lost as part of the proposed development.

It should be noted that there is a discrepancy with the proposed ground floor plan which states that there are no changes to the public house space aside from the repositioning of the stairs.

Following a site visit by officers it was found that some works had already been made to the internal arrangement of the upper floors and as a result the upper floors no longer resembled the submitted existing plans. Updated existing plans were sought and submitted by the applicant to reflect these changes.

Relevant Planning History:

<i>App Number:</i>	19/2600/F	<i>Decision:</i>	Approved	<i>Decision Date:</i>	19/11/2020
<i>Address:</i>	Land rear of White Swan, 22 The Village, Charlton				
<i>Description:</i>	Construction of a single storey 3-Bed family dwelling with associated private amenity, driveway, bin and bike storage.				

<i>App Number:</i>	17/2043/F	<i>Decision:</i>	Refused (Dismissed at appeal: APP/E5330/W/18/32028 07)	<i>Decision Date:</i>	15/12/2017
<i>Address:</i>	Land rear of White Swan, 22 The Village, Charlton				
<i>Description:</i>	Construction of a new 3-bed dwelling and associated amenities.				
<i>Reason for refusal:</i>	<ol style="list-style-type: none"> 1. By reason of its scale, bulk, site coverage, contemporary design and cramped appearance, the proposed development would fail to preserve the character and appearance of the Conservation Area and would be contrary to Policies 3.5, 7.8 and 7.9 of the London Plan (2016), Policies H5, H(c), DH1, DH3 and DH(h) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies 2014, and Charlton Village Conservation Area Character Appraisal. 				

<i>App Number:</i>	16/2429/NM	<i>Decision:</i>	Refused	<i>Decision Date:</i>	24/01/2017
<i>Address:</i>	White Swan, 22 The Village, Charlton				
<i>Description:</i>	Reduce letting rooms at first floor from 8 rooms to 7 rooms as non-material amendment of planning permission dated 16/03/2012 Ref: 12/0117/F.				

<i>Reason for refusal:</i>	<p>1. In the absence of information to confirm the current use of the first floor and that the approved development (under planning reference number 12/0117/F dated 16th March 2012) has been implemented and in accordance with the approved plan, it is considered that inadequate information was submitted for the Council to fully assess the proposed amendment under the scope of the Section 96A of the Town and Country Planning Act 1990. As such, it is considered that the application be refused.</p>
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<i>App Number:</i>	16/1530/ F	<i>Decision</i>	Refused	<i>Decision Date:</i>	20/01/2017
<i>Address:</i>	Land rear of White Swan, 22 The Village, Charlton				
<i>Description:</i>	Construction of a pair of 3-bed semi-detached two storey family dwellings with basement level.				
<i>Reason for refusal:</i>	<ol style="list-style-type: none"> 1. By reason of its scale, bulk, contemporary design, cramped appearance and external materials, the proposed development would fail to preserve the character and appearance of the Conservation Area and would be contrary to Policies 3.5, 7.8 and 7.9 of the London Plan (2016), Policies H3, H5, H(c), DH1, DH3 and DH(h) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies 2014, Charlton Village Conservation Area and the Council's Residential Extensions, Basement and Conversions Guidance SPD (July 2016). 2. The development fails to provide a high quality design that respects the character of its surroundings and would be contrary to Policies 3.5 and 7.4 of the London Plan (2016), Policies H1, H5, H(c) and DH1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies 2014, and the Council's Residential Extensions, Basement and Conversions Guidance SPD (July 2016). 3. The proposed development by reason of its location and close proximity to the beer garden, would fail to provide a high quality living environment for future occupiers of the dwellings due to noise and disturbance from the beer garden. The proposed development would therefore fail to accord with Policy 3.5 of the London Plan and Policy E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies 2014 and the Council's Residential Extensions, Basement and Conversions Guidance SPD (July 2016). 4. The proposed development by reason of inadequate useable external amenity space would fail to accord with Policy H5 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies 2014 and the Council's Residential Extensions, Basement and Conversions Guidance SPD (July 2016). 				

<i>App Number:</i>	15/2968/F	<i>Decision</i>	Refused (Dismissed at appeal: APP/E5330/W/16/3148088)	<i>Decision Date:</i>	02/12/2015
<i>Address:</i>	Land rear of White Swan, 22 The Village, Charlton				
<i>Description:</i>	Construction of a pair of 3-bed semi-detached two storey family dwellings with basement level.				
<i>Reason for refusal:</i>	<ol style="list-style-type: none"> 1. The proposed dwellings, by reason of their location on previously undeveloped land, and forming part of the rear garden to the public house and would fail to promote sustainable forms of development and would appear as a discordant feature within the area failing to respect the established character of the area. As such the proposed dwellings fail to reuse brownfield land and therefore constitute an inappropriate form of development and as fail to comply with Policy 3.5 of the London Plan 2015 and Policies DH1 and DH3 of the Core Strategy with Detailed Policies. 2. The proposed dwellings, by reason of their location on previously undeveloped land, and in the absence of a tree survey has failed to demonstrate that the development will not have an adverse impact on existing trees on site contrary to Policies H(c) and OS(f) of the Core Strategy with Detailed Policies. 3. The proposed development would feature light wells to the front of the dwelling and which are not a feature of neighbouring. As such the proposal would constitute a discordant and alien feature which would set an undesirable precedent contrary to Policy 7.4 of the London Plan 2015 and Policy DH1 of the Core Strategy with Detailed Policies 4. The proposed development by reason of its isolated location and access via a road that is not well used by members of the public, especially at night would fail to provide a safe and secure environment for future occupiers of the development and would in direct conflict with policy 7.3 of the London Plan 2015. 5. The proposed development by reason of its location and close proximity to the beer garden, would fail to provide a high quality living environment for future occupiers of the dwellings due to noise and disturbance from the beer garden. The proposed development would therefore fail to accord with policy E(a) of the Core Strategy with Detailed Policies. 6. The proposed development by reason of inadequate useable garden space would fail to accord with policy H5 of the Core Strategy with Detailed Policies. 				

<i>App Number:</i>	12/0117/F	<i>Decision:</i>	Approved	<i>Decision Date:</i>	16/03/2012
<i>Address:</i>	White Swan, 22 The Village, Charlton				
<i>Description:</i>	Change of use of first floor from Manager's accommodation to (C1) providing 8 bedrooms.				

Neighbour and Ward Councillor Notification

Twenty-four (24) neighbouring properties, two (2) ward councillors, the Charlton Society, the Charlton Central Residents Association and the Charlton Neighbourhood Forum were notified on the 6th September 2022.

Additionally, a site notice was displayed at the site on the 16th September 2022 and a press notice published on the 14th September 2022.

One hundred and forty-seven (147) representations were received, all in objection to the proposed development, these are summarised in the table below.

The proposed development was also called in to committee by Cllr Jo Van Den Broek on the 29th September 2022, should officers be minded to recommend approval, by reason of the public interest in the building which is an Asset of Community Value.

Cllr Van Den Broek also raised concerns about the viability of the public house should the first floor be changed to residential accommodation as well as how the integrity and history of the building may be affected.

Summary of objections	Officers comments
<ul style="list-style-type: none"> Proposed development would result in the loss of a public house to the detriment of the local community The public house is being marketed at an unfair rate making it unattractive to potential occupiers Residential accommodating above the public house would make it unappealing to future tenants of the pub The surrounding area lacks infrastructure to support more residential development The proposed development is unacceptable to an Asset of Community 	<p>These aspects of the proposed development are addressed under the principle of development section below in the report.</p> <p>It should be noted that the proposed development would retain a public house on the ground floor albeit with a smaller floorspace.</p>

<p>Value</p> <ul style="list-style-type: none"> • The local area does not require additional residential accommodation • The proposed development would result in a shortfall in public houses in an area whereby they are already scarce • Residential development above the public house would render the continued use of part of the building as a public house as unviable • Potential loss of public house would damage the high street and further push people towards other centres until the high street dies. • The loss of the upper floor function rooms and partial loss of ground floor space associated with the public house would render the existing use as a public house as unviable • The dwelling approved in the rear garden under 19/2600/F has already compromised the viability of the public house, further residential development would exacerbate this • The proposed development would result in the loss of a space used by community groups, local musicians and comedians and supporters of Charlton Athletic Football Club to the detriment of the wider area 	
<p>There is a shortage of Public House and similar social spaces within this part of Charlton which would be exacerbated by the proposed development</p>	<p>It should be noted that the proposed development retains the public house on the ground floor albeit with a reduced floorspace.</p>
<ul style="list-style-type: none"> • Residential accommodation above a public house would provide a noisy and disturbed living environment for future occupiers 	<p>This aspect of the proposed development is assessed within the standard of accommodation section below in the report.</p>

<ul style="list-style-type: none"> The residential units would have a poor outlook by reason of the proximity of the protected willow tree to the rear windows. 	
<ul style="list-style-type: none"> The proposed development would introduce noise sensitive use above the pub which may lead to complaints to environmental health and unreasonable restrictions placed on the public house to the detriment of its continued viability 	This aspect of the proposed development is assessed within the neighbour amenity section below in the report.
<ul style="list-style-type: none"> The proposed development would erode the historic fabric of the area The proposed development would ruin the architectural appearance of the host building 	This is assessed within the design and heritage section below in the report.
<ul style="list-style-type: none"> The proposed development would result in the erosion of the garden space to the rear and the loss of a willow tree 	The rear garden space is proposed to remain as is and the proposed development does not bring forward any plans to remove a willow tree under this application.
<ul style="list-style-type: none"> Concerns raised with regard to increase in traffic within Charlton Village 	This aspect of the proposed development is assessed within the highways section below in the report.
<ul style="list-style-type: none"> The proposed development is motivated by greed and profit alone The adjacent pub is unsafe and unwelcoming Disruption during construction works 	These are not planning considerations

Responses from amenity groups

<p>The Charlton Society:</p>	<p><i>I am writing as Chair of The Charlton Society, whose Committee unanimously object to this application.</i></p> <p><i>The prospect of converting usage of the first floor to residential dwellings harms the viability of any future pub. Previously the White Swan was a well regarded and well attended public house, accessible to the community.</i></p> <p><i>It is very much missed as a public house; the loss of a fully equipped community venue is a huge blow to the Village.</i></p> <p><i>It also needs to be mentioned, the behaviour of the owners (Mendoza) has systematically attempted to undermine the facilities of the pub to render it unviable to operate thus which of huge concern.</i></p>
<p>South East London branch for the Campaign for Real Ale</p>	<p><i>On behalf of the south east London branch of the Campaign for Real Ale, I would like to object to this application as it would result in a much valued community public house and as such</i></p>

(CAMRA):

would be in breach of the local plan policy EA(b).

The provided marketing report does not demonstrate the unviability of the pub and worse still only offers, for rent, part of the current pub. The marketing report fails to even mention the part of the building to which this application applies.

The abject failure of the marketing agent to raise interest in the pub could be down to any number of reasons other than the viability of this particular premises, such as, unrealistic terms, or the fact that the hospitality industry is in a period of extreme stress at the moment. I believe that the pub would be viable if the rental terms were appropriate and the constant uncertainty about the ancillary parts of the building were addressed.

Other Consultation Responses	
Highways	<i>No Highway objection is raised.</i>
Environmental Health	<i>No response received.</i>
Waste Services	<i>"We are satisfied with the proposal"</i>
Conservation	<p><i>Now that the local listing of the White Swan PH is imminent, I have revisited my comments on the above application and have revised them accordingly below:-</i></p> <ul style="list-style-type: none"><i>- The White Swan PH is an unlisted building within the Charlton Village Conservation Area. It has been nominated as potentially locally listable and is currently being assessed;</i><i>- It is a two-storey building which dates from the end of the 19th century (c.1889), although there is evidence of an inn of this site since at least 1832 and the submitted Heritage Statement identifies a date plaque which indicates that the current building is a rebuild of a former pub on the site;</i><i>- The building is symmetrically arranged about a central ornately decorated pub frontage, with bay windows at ground floor level either side, and with arched-headed sliding-sash windows above which display decorative fanlights and over-panels. The submitted Heritage Statement indicates that the building originally had a further attic storey and this has been corroborated by historic photographs. The attic floor was damaged by the bomb which fell in the vicinity and was subsequently removed;</i><i>- The significance of the building lies in its architectural value, which, despite the loss of its attic floor, makes a positive contribution to the character and appearance of the Charlton Village Conservation Area; and for its historic value. As a site which has been in continuous single use since at least 1832,</i>

the on-going use of the ground floor for public house use is fundamental to this;

- It is proposed to change the use of the first floor level to residential accommodation;

- The existing plans suggest that first floor may have, in part, been used as a function room. However, what might have been the function room (front room overlooking the street) has been sub-divided with some partitions. These will be lost to the conversion;

- Even as a locally listed building, there is little control over the internal alterations. It is, though, noted that, within the rear living room of proposed apartment 2, it is proposed to remove a chimney breast which may have implications for the external chimney. Whilst the proposed rear elevation shows the retention of the associated chimney, this needs to be ensured, as chimneys are a characteristic of the conservation area and its loss would not be supported;

- The external alterations proposed consist of the removal of the existing flue to the rear elevation; and the upgrade of windows to double-glazed. The removal of the unsightly flue will have a beneficial impact. However, given that the ground floor pub use will be retained, the removal of the flue may be unrealistic;

- Consideration should be given to the incompatibility of residential accommodation above a noise-generating use which extends into the night. No details have been provided regarding the up-grade of fabric (other than windows – see below) which would be necessary to overcome this and the impact this may have on the appearance of the building;

- The proposals for the windows is unclear. The documents suggest that it is intended to replace the existing glazing with double-glazed units with trickle vents but this might not be achievable within the existing frames and would result in the wholesale replacement of the windows. This would not be acceptable. The Charlton Village Conservation Area Management Strategy advocates repair and conservation of historic windows rather than replacement. The proposed replacement with double-glazing would not only result in the loss of historic fabric but would also cause harm to the character and appearance of the building. The flat appearance of modern glass and the internal reflections resulting from double-glazing will cause a perceptible change in the buildings appearance.

The proposed conversion of the first floor to residential use, whilst to be regretted, is not resisted. However, retention of the ground floor use as a public house is fundamental to the

	<p><i>historic interest of the building and the proposed conversion of the upper floors should only be permitted where it has been demonstrated that this will not be jeopardised by conflict between the uses. Conditions need to be attached to any approval for further details to be provided on how this will be achieved.</i></p> <p><i>Notwithstanding this, the proposed replacement of the existing windows with double-glazing would have a detrimental impact on the character and appearance of the building and therefore the wider conservation area.</i></p> <p><i>As such, the proposals do not comply with National (NPPF paras. 189, 197, 199, 202, 203), London Plan (D3.11, D13.A, D13.B D13.D, HC1.C, HC7.C) or Local Plan policies (DH1, DH3, DH(h)) and it is not, therefore, possible to support approval.</i></p> <p><i>I hope this helps but if you require clarification or further comment, please let me know.</i></p>
Transport for London	<p><i>Having assessed the proposals, I can confirm that TfL Spatial Planning has no strategic comments to make on this planning application other than to emphasise the development should comply with the transport policies set out in The London Plan 2021. In particular the car and cycle parking standards in tables 10.2 – 10.6 (inclusive). Cycle parking should comply with the London Cycling Design Standards (https://tfl.gov.uk/corporate/publications-and-reports/streets-too/kit).</i></p>

Policies and Guidance:

National Planning Policy Framework (2021)

Chapter 5	Delivering a sufficient supply of homes
Chapter 6	Building a strong, competitive economy
Chapter 8	Promoting healthy and safe communities
Chapter 9	Promoting sustainable transport
Chapter 12	Achieving well-designed places

Nationally Described Space Standard (2015)

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

The London Plan (2021):

Policy GG2	Making the best use of land
Policy GG4	Delivery homes Londoners need

Policy GG5	Growing a good economy
Policy D3	Optimising site capacity through the design-led Approach
Policy D4	Delivering good design
Policy D5	Inclusive design
Policy D6	Housing quality standards
Policy D7	Accessible Housing
Policy D13	Agent of Change
Policy D14	Noise
Policy H1	Increasing Housing Supply
Policy H2	Small Sites
Policy H10	Housing Size Mix
Policy E2	Providing suitable business space
Policy HC1	Heritage, conservation and growth
Policy HC5	Supporting London's culture and creative industries
Policy HC7	Protecting public houses
Policy S1	Developing London's social infrastructure
Policy SI 1	Improving Air Quality
Policy S12	Minimising greenhouse gas emissions
Policy SI5	Water Infrastructure
Policy SI 7	Reducing waste and supporting the circular economy
Policy SI 8	Waste capacity and net waste self-sufficiency
Policy T4	Assessing and mitigating transport impacts
Policy T5	Cycling
Policy T6	Car parking
Policy T6.1	Residential Parking
Policy T7	Deliveries, servicing and construction

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

Policy H1	New Housing
Policy H2	Housing Mix
Policy H5	Housing Design
Policy EA1	Economic Development
Policy EA(b)	Pubs
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 E(a)	Pollution
Policy E(c)	Air pollution
Policy IM4	Sustainable Travel
Policy IM(a)	Impact on the Road Network
Policy IM(b)	Walking and Cycling
Policy IM(c)	Parking Standards

Supplementary Planning Guidance/Documents:

London Housing SPG (2016)

RBG CIL Charging Schedule (2015)

New Developments Guidance Notes for the storage and collection of waste and recycling materials for the Royal Borough of Greenwich (2018)

Charlton Village Conservation Area Character Appraisal (2016)

Charlton Village Conservation Area Management Strategy (2016)

Planning Considerations:

The main planning considerations relevant to this case are:

- Principle of development;
- Housing mix
- Design and heritage
- Impact on neighbouring amenity
- Quality of residential accommodation
- Inclusive design
- Transport and Highways
- Cycle Storage
- Refuse and Recycling; and
- Sustainability
- Tilted Balance (5YHLS):
- CIL

Principle of Development

The overriding objective of the Royal Greenwich policy framework is to deliver high quality development which improves the quality and distinctive identity of places and contributes to their success and the area's popularity as somewhere to live, work and stay.

Partial loss of public house and impact on future viability of public house

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

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

Supporting paragraph 7.7.8 of Policy HC7 refers to the change of use of upper floors of the public houses and states that development such as this could limit the operational flexibility of the pub and make it less attractive to customer and prevent ancillary spaces being used by the local community. It also states that the viability of pubs could also be

reduced by reason of increased complaints about and other issues from new residents and that Boroughs should resist redevelopment of associated accommodation and facilities within the curtilage of public houses which would compromise the operation or viability of the public house.

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

The applicant has submitted a marketing statement as part of the submissions confirming that the public house closed on November 2019. The public house was marketed by Jenkins Law at a rate of £50,000 per annum. The marketing effort included the erection of a marketing board outside the premises, the circulation of the details of the lease to all subscribers on the Jenkins Law database, specifically targeting parties with known requirement for this type of leasehold property as well as listing the property on their website. Further marketing was undertaken through Estates Agent Clearing House (EACH) both online and via physical send outs regularly.

The marketing garnered a limited response with only four onsite inspections. As a result of this, the quoting rent was lowered in 2020 to £40,000 pa. Although the rent was reduced, the site received no further offers to date. The marketing report states that the lack of interested parties is largely down to market conditions as well as the poor location and lack of footfall in the area.

Officers note however that the marketing report is not dated and within section 6.1 of the summary states that the site had been marketed for a period of 12 months without finding a tenant. Given marketing was stated to have begun in November 2019, this would suggest that the marketing report was written towards the end of 2020. The country entered lockdown on March 2020 whereby pubs and similar venues were ordered to close, it is therefore understandable as to why market conditions at the time were not conducive in securing a leaseholder for the premises and the period within which the site was marketed would not represent typical market conditions

It is noted that all viewings of the property were conducted in late 2019 and early 2020, prior to the national lockdown. No evidence has been put forward that the site has been marketed beyond the end of 2020 and more importantly since mid-2021 whereby lockdown restrictions were eased, and marketing conditions improved dramatically. It is noted from the site visit that no marketing board was present outside the premises, and it is no longer listed on the Jenkins Law website for rent. Furthermore, no comparison of similar venues in the area have been provided for the Local Authority to gauge whether the offered rental price represents fair marketing terms.

Notwithstanding the above, the proposed development brought forward under this application seeks to retain the pub use on the ground floor whereas the marketing statement attempts to demonstrate that the public house in any form is no longer viable at this site. Given the deficiencies outlined within the submitted marketing statement, it

is not considered that this constitutes an accurate representation of the current viability of the pub.

Policy EA(b) of the CS (2014) largely relates to the entire loss of a public house as opposed to the partial loss proposed under this application. Part C of Policy HC7 of the LP (2021) states that development proposals for redevelopment of associated accommodation that would compromise the operation or viability of the public house should be resisted.

Officers requested that a viability assessment be provided demonstrating that the resultant floorspace would allow for a public house to continue to operate from the site. The applicant responded stating that they would not be providing this information. As such, part C of Policy HC7 (2021) has not been met. It should be noted that under application 19/2600/F which approved a dwelling in the rear garden which resulted in the partial loss of the beer garden that a viability assessment was sought and submitted by the applicant to demonstrate that the resultant floorspace would provide a viable public house in the future.

Officers raised concerns that given a significant portion of the ground floor of the pub would be lost to provide access to the residential accommodation above as well the requisite cycle parking and waste storage that the public house would not be viable. Furthermore, it is noted from the viability assessment submitted as part of application 19/2600/F stated that the first floor of the public house contained a function room, a pool room and a cocktail bar with seating for 26 persons. This is corroborated by several objectors who stated that they had hired a function room at the premises in the past. On this basis, the council were able to recommend approval for application 19/2600/F given a significant amount of indoor floorspace associated with the pub would be retained with only a small portion of the beer garden lost.

It is also noted within the viability statement that the staff accommodation is contained within a flat contained with the single-storey extension to the rear. This further suggests that the upper floors were in use as function rooms or other rooms associated with the use of the public house as opposed to accommodation for the manager only.

Under this application, a portion of the ground floor would be lost as a result of the proposed development as well as the entirety of the upper floors which consisted of a function room, pool room and cocktail bar. This would result in the loss of a significant amount of floorspace associated with the pub which would have an impact on the future viability of the public house to continue as such.

This view is supported by the lack of interest derived from the marketing campaign, although officers acknowledge that it appears that the public house was marketed during a time of incredibly poor market conditions due to the national lockdown. It is noted from the submitted marketing statement that only the ground floor and basement were available to future tenants. No mention is made of the amenities on the first floor. Given this contained a pool room, function room and cocktail bar, officers are of the view that this would make a much more attractive offering for future tenants than what it was advertised.

In light of the above, a viability assessment is required in this instance given the

proposed development result in the loss of over half of the available floorspace to future occupiers. Furthermore, given the significant number of objections outlining the importance of the continued operation of the public house at the site for the surrounding Charlton community as well as the listing of the building as an Asset of Community Value, it is vital that robust evidence is provided which demonstrates that the building is able to continue as a public house or other community asset in some form.

The applicants failure to provide a viability assessment has therefore not allowed officers to assess and determine the scale and extent of the impact of the proposed development on the continued function of a public house at the site and whether this operation on the site has been compromised. Given part C of Policy HC7 of the LP (2021) states that development that fails to demonstrate this should be resisted, officers reject the application on this basis.

Provision of residential accommodation

The Royal Borough of Greenwich makes a major contribution to London's Housing provision, having the third largest target for new housing of all London Boroughs. It is vital that the Royal Borough's unique housing needs are met, while still contributing to the overall London housing numbers. The NPPF supports the delivery of sufficient homes to meet current housing needs.

In this respect Policy GG4 of the London Plan (2021) (LP) seeks to ensure that more homes are delivered. To assist in this Policy H1 of the LP highlights the pressing need for more homes in London and outlines for each local authority their 10-year targets for net housing completions. The Royal Borough's target is to deliver 28,240 dwellings. In addition to this, Policy H2 of the LP notes that Boroughs should pro-actively support well-designed new homes on small sites (identified as being below 0.25 hectares in size) and that of the 28,240 new homes to be delivered these sites should accommodate 3010 dwellings.

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

Policy H2 of the LP states that boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and small sites.

Policy H2 of the Core Strategy (2014) (CS) promotes a mix of housing types and sizes, varying according to the location of the development and the character of the surrounding area. Other relevant considerations include; the level of accessibility to public transport, schemes for special needs groups, or where there is a poor external environment.

The addition of two residential units over and above the existing situation on the site is considered acceptable in principle in meeting the housing targets of Royal Greenwich and London in general, subject to the other material planning considerations, and demonstrating design quality and addressing potential amenity impacts are to be met.

Conclusion

The proposed development would result in the partial loss of floorspace associated with the existing Public House with no justification provided for its loss. Consequently, insufficient evidence has been submitted demonstrating how the existing Public House on the site would continue to be economically viable and would not result in the loss of a social community asset to the detriment of the local area contrary to policies HC6 of the London Plan (2021) and Policy EA(b) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Housing Mix

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

The existing development on the site provides 2x2-bedroom units. The proposal does not bring forwards any additional 3+ bedroom properties however given the limitations of the site and noting its positioning above a public house and lack of private amenity space which would be considered inappropriate for occupation

Design and Heritage

The National Planning Policy Framework (NPPF) (2021) states that the creation of a high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Chapter 12 – para 126).

Paragraph 130 states further that planning decision should ensure that developments are:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- a) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- b) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- c) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- d) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- e) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of

life or community cohesion and resilience.

Paragraph 134 goes on to state that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- Development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
- Outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policy D3 of the LP states that development proposals should make the best use of land by 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 CS requires all developments to be of a high quality of design and demonstrate that they positively contribute to the improvement of both the built and natural environments. Policy H5 of the CS states that 'new residential development will be expected to achieve a high quality of housing design and an integrated environment. The Royal Borough will take into account the key relationship between the character of the area, site location and housing densities'.

In January 2023, the Local Authority began a consultation on the local listing of the application site. As such, this forms a material planning consideration and weight must also be given to 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.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the preservation of listed buildings and their settings. This is reiterated at Paragraph 193 of the NPPF which states that great weight should be placed on the conservation of designated heritage assets, with clear and convincing justification being required for any harm to, or loss of, the assets

significance (paragraph 194). This is also reiterated within Policy HC1 of the London Plan and at Policies DH3 and DH(j) of the Core Strategy. The sits within the Charlton Village Conservation Area.

Similarly, for conservation areas, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to be paid to the preservation and enhancement of the character and appearance of the conservation area(s). Paragraph 193 of the NPPF states that great weight should be placed on the conservation of designated heritage assets, with clear and convincing justification being required for any harm to, or loss of, the assets significance (paragraph 194). This same requirement is in place at the local level, through Policy HC1 of the London Plan and Policies DH3 and DH(h) of the Core Strategy. The sits within the Charlton Village Conservation Area.

No increase in footprint is proposed and the only external alterations to the development relate to the fenestration which is indicated on the proposed plans to be replaced with double glazing windows. The Council's Heritage Officer has raised concern regarding this aspect of the proposal stating this would result perceptible changes in the buildings appearance.

Had this application been recommended for approval full details of the replacement materials used would be required to be submitted and approved in writing by the Local Planning Authority prior to occupation in order to protect the visual amenity of the wider conservation area and host dwelling which may be locally listed at the time of occupation.

The heritage officer also raised concern with regard to the potential loss of the chimney stack, although it should be noted that despite this being removed internally it is to be retained externally. Had this application been recommended for approval, further assurances from the applicant would have been sought with regard to whether the removal of the chimney breast internally would not compromise the external chimney which is considered to contribute positively to the visual amenity of the streetscene and the Charlton Village Conservation Area generally.

Overall the heritage officer did not raise concern with the principle of the change of use of the upper floors to residential accommodation. As such, with the imposition of a materials condition and assurances of the retention of the external chimney stack, the proposal is considered to preserve the character and appearance of the host building and streetscene, in accordance with the NPPF, Policy D3 and HC1 of the London Plan (2021), Policies DH1, DH3, DH(h) and DH(j) of the Royal Borough of Greenwich Adopted Core Strategy (with Detailed Policies) July 2014 and the Planning (Listed Buildings and Conservation Areas) Act 1990.

Impact on neighbouring amenity

Policy DH(b) of the CS requires new development to demonstrate that there would be

no significant loss of amenity to adjacent or nearby properties, by reducing the amount of daylight, sunlight, privacy or outlook they enjoy, by creating an unneighbourly sense of enclosure, or by unacceptably impacting the wind environment or microclimate.

Policy E(a) of the CS states that planning permission will not normally be granted where a proposed development or change of use would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and Soil pollutants or grit.

Policy D14 of the LP sets out that development proposals should seek to proactively manage noise impacts in a variety of ways where possible. Proposals should use good design to mitigate and minimise existing and potential nuisances generated by uses and activities located in the area.

Policy D13 of the London Plan (2021) sets out that the Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise sensitive development. The policy sets out that Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. Policy D13 sets out that new noise and other nuisance generating development proposed close to residential and other noise sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

No increase in the footprint of the building is proposed therefore it would not result in any unacceptable loss of natural light or outlook for neighbouring properties. Whilst the windows are proposed to be replaced, this are not proposed to be enlarged or altered in shape or position in any way. As such the proposal would not result in any loss of privacy or significant overlooking over and above the existing situation.

The additional residential occupancy at first floor level would not result in noise and disturbance over and above the existing situation, particularly when taking into account the existing use of the site as a Public House.

The proposal seeks to provide residential accommodation above the existing Public House. Whilst this would introduce a noise sensitive use to the site, it is not uncommon for residential accommodation to be provided above Public Houses, particularly in London whereby the landlords/managers of public houses are increasingly living off site.

Examining the proposal with respect to the Agent of Change principle and Policy D13 of the LP (2021), in order to ensure that the ground floor public house is not the subject of noise complaints from future occupiers which may in turn lead to unreasonable restrictions placed on the public house which could impact upon the viability of the public house, full details of noise insulation and mitigation measures would need to be submitted to and approved in writing by the Local Planning Authority in order to ensure

compliance with the Agent of Change principle and Policy D13 of the London Plan (2021) and to avoid conflict between the existing and proposed uses at the site.

The proposal would have an acceptable impact on amenity for the neighbouring occupiers in accordance with Policies D13 and D14 of the London Plan (2021) and Policies DH(b) and E(a) of the Core Strategy (CS).

Quality of residential accommodation

Policy H5 of the CS, requires that new residential development, redevelopment or conversions to provide a high quality of housing design and environment. In this regard the Nationally Described Space Standards and Policy D6 of the LP sets out specific space standards that proposed residential accommodation should comply with.

Dwell	Dwelling Type	Nationally Described and London Plan Space Standard's (m²)	Proposed GIA (m²)	Complies
Unit 1	2b4p	70	76	Yes
Unit 2	2b4p	70	80	Yes

As can be seen from the above, the proposed dwelling meets the minimum gross internal area (GIA) requirements of the London Plan.

All the double bedrooms would comply with the internal area standards of the Nationally Described Space Standards (2015) of a minimum internal area requirement of 11.5sqm.

Adequate built-in storage could be provided within the existing floorspace.

The Technical Housing Standards require a single storey dwelling to include one bathroom. The proposed development would be compliant with this requirement, showing the provision of two-bathroom spaces per unit.

It is noted that the Technical Housing Standards states that the minimum floor-to-ceiling height is 2.3m for at least 75% of the GIA. Standard 31 of the Mayor's Housing SPG however 'strongly encourages' a minimum ceiling height of 2.5m for at least 75% of the GIA. However, the recently adopted LP sets out in Policy D6 that new dwellings should ensure that units have a minimum floor to ceiling height of 2.5m across 75% of the GIA.

Examining the submitted section drawings, the proposed development would be far in excess of the above standards.

Outdoor space provision

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

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

Neither unit would be provided with outdoor amenity space. Owing to the site constraints with regard to the ground floor public house use and associated beer garden to the rear, private outdoor amenity space is not able to be provided at the site. Whilst this is regrettable, it should be noted that the units would not likely be occupied by families whereby outdoor amenity space is more important. Moreover, the site is within 2 minute walk of Charlton Park, located immediately to the south.

Furthermore, the proposed units would overprovide internal space and would therefore comply with paragraph 2.3.32 of the Mayor's Housing SPG which states that in exceptional circumstance where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead provide with additional internal living space equivalent to the area of the private open space requirement.

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

Outlook, light 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.

Royal Greenwich Local Plan; Core Strategy Policy H5 states that the quality of new housing should meet the standards of Mayor of London's Housing SPG. Policy H5 also confirms the Council's presumption against single aspect north facing units and a presumption in favour of dual aspect units where possible.

Whilst it is noted that unit 1 would be single aspect, north facing only, given the site constraints it would be difficult to provide two units which are dual aspect. Furthermore, both bedrooms and the open plan lounge, kitchen and diner would all be served by two large windows each. As such, it is considered that excellent outlook and daylight penetration would be afforded to future occupiers and daylight

Whilst it is regrettable that unit one would not be afforded direct sunlight for at least part of the day, given this is the only deficiency in an otherwise excellent standard of

accommodation, a reason for refusal on this alone is not considered justified in this instance.

Unit 2 would be dual aspect and would be predominantly south facing, as such future occupiers of this unit would be afforded excellent daylight/sunlight penetration as well as a good outlook. All units would also receive a good degree of privacy with no of windows unacceptable overlooked.

Whilst it is noted that the ground floor public house may re-open and serve food as part of its offering which in turn would expose unit 2 to unacceptable fumes and odours derived from the kitchen area, had this application have been recommended for approval full details as to how these impacts would be managed and mitigated would be required to be submitted to and approved in writing by the local planning authority in order to protect the living conditions of future occupiers. It is considered that this could reasonably be achieved by any prospective tenants of the public house without impinging on the existing function of the public house in accordance with the Agent of Change principle and Policy D13 of the London Plan.

Noise, odours and fumes

Policy D14 of the LP seeks to mitigate and minimise the existing and potential adverse impacts of noise from within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses. This is supported by Policy E(a) of the CS.

It is emphasised that the site exists immediately adjacent to The Village, a street designated as a local frontage whereby there would already be some noise and disturbance for future occupiers. As noted in the neighbour amenity section, had this application been recommended for approval full details of noise insulation and mitigation measures would need to be submitted to and approved in writing by the Local Planning Authority in order to ensure future occupiers are not exposed to unacceptable levels of noise and disturbance.

Whilst it is noted that the ground floor public house may re-open and serve food as part of its offering which in turn would expose unit 2 to unacceptable fumes and odours derived from the kitchen area, had this application have been recommended for approval full details as to how these impacts would be managed and mitigated would be required to be submitted to and approved in writing by the local planning authority in order to protect the living conditions of future occupiers.

It is considered that the above impacts could reasonably be managed by the applicant without impinging on the existing function of the public house in accordance with the Agent of Change principle and Policy D13 of the London Plan.

Conclusion

Overall, it is considered that the proposal would provide an acceptable quality of accommodation for residents and would therefore be in accordance with Policy D6 of the LP, the Mayor of London Housing SPG (2016) and Policies H5 and DH1 of the Core Strategy in this regard.

Inclusive design

LP Policy D7 states that new housing must meet building regulation M4(2) 'accessible & adaptable dwellings'. Policy D5 requires developments to be designed so that they provide an inclusive environment for all members of society.

CS Policy H5 supports the principles of inclusive living environment and Policy DH1 also states that all new developments should achieve accessible and inclusive environments.

As the proposal amounts to a conversion, it would not be possible for the development to achieve M4(2) compliance, however compliance with M4(1) "Visitable Dwellings" would be possible, and this is secured by current building regulations.

Transport and Highways:

Policy T2 of the LP states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Policy T2 also states that development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving.

Policy T6 of the LP states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking.

Policy T6.1 further sets out that maximum parking provision for residential development should be in accordance with Table 10.3. For a residential development of this size, the London Plan sets out that each new dwelling proposed should be car free.

Policy IM4 of the CS supports the development of an integrated and sustainable transport system that is extensive in coverage and meets the needs of residents, businesses, workers and visitors in Royal Greenwich. It requires all development in Royal Greenwich to contribute to improved accessibility and safety and to reduce the use of the private car and the need to travel.

It is noted that the site is located within an area classified as PTAL 4 for accessibility to public transport (on a scale of 1 to 6 with 6b being the best), demonstrating an above average level of access to public transport accessibility. The site is located approximately a 15 minute walk from Charlton Rail station and is served by multiple bus routes along The Village.

Policy T6 of the LP is clear in the respect that residential development should not exceed the maximum parking standards set out in Table 10.3 which clearly sets out that areas with a PTAL rating of 4 should be car free. The proposal brings forwards plans which are car free in line with Policy T6 of the LP.

Given the only minor increase in the number of proposed occupants living at the site, it is considered that the proposed development would not result in any significantly detrimental traffic impacts.

The Councils Highways officers has also been consulted and has raised no objection to the proposed development on highways grounds.

As such the proposal would be in accordance with Policies T2, T4, T6 and T6.1 of the London Plan (2021) and Policies IM4 and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (adopted July 2014).

Cycle Storage:

Policy T5 of the LP states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. The policy is clear that proposals should do this by meeting providing cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3. The cycle parking should be fit for purpose, secure and well-located.

The previous application was refused by reason of its failure to provide cycle storage spaces, this view was supported by the inspector at appeal. The proposal brings forward plans to provide four cycle parking spaces on the ground floor of the site adjacent to the front door.

Within Policy T5, Table 10.2 in the LP sets out that a proposal of the type brought forward in this application should provide four cycle parking spaces. This is supported by Policy IM(b) of the CS.

The proposal provides the minimum requirement of cycle parking spaces. This would be sited with a secure and dry area within the existing building and would be easily accessible for future occupiers. Both TFL and the Councils highways officer have confirmed no objections to this element of the proposed development.

A condition would be attached to any approval requiring the proposed cycle parking provision to be implemented.

Refuse and Recycling

CS Policy H5 identifies that development needs to minimise the production of waste, to promote the reuse and recycling of waste materials and to ensure that waste disposal is environmentally responsible. As such residential schemes should incorporate measures for community recycling that minimises waste disposal and should provide refuse bins and recycling boxes. This is supported by LP Policy SI 8.

The proposal would provide waste provision consisting of 2x240L refuse bins , 2x240L recycle bin and 1x 240L food waste bins. This would be contained adjacent to the front residential entrance within the building and would be separate from the refuse storage associated with the public house. The waste officer has been consulted and has no objection to the proposed development.

A condition has been attached requiring this provision to be provided and retained.

Sustainability

Policy DH1 of the CS sets out Council's expectations for all development to maximise energy conservation and minimise future carbon dioxide emissions and mitigate climate change, and to comply with LP Policy S12 and Policy E1 of the adopted CS.

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

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

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

Tilted Balance (5YHLS):

The Council at present has only a 3.1 years of housing land supply. This means that Royal Greenwich is not meeting the NPPF requirement for a five-year housing land supply. Consideration, therefore, must be given to paragraph 11 of the NPPF and the tilted balance. The relevant parts state:

Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Out of date policies include, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites under the NPPF (with the appropriate buffer, as set out in paragraph 74 of the NPPF).

However, firstly, in relation to conversions of buildings to create one additional dwelling or a small number of additional dwellings, it is considered that the housing land supply policies are not the most important for determining the application under paragraph 11.d), given the small contribution to the Council's housing supply and the potential impacts of such development. It is considered that the most important policies are those relating to the character and appearance of the area and residential amenity. As such, it is considered that the tilted balance in paragraph 11.d) does not apply in this instance.

Secondly, in the alternative, even if the view were taken that the tilted balance in paragraph 11.d) does apply in this instance, it is considered that the adverse impacts identified in the reason for refusal on the decision notice demonstrably outweigh the benefits of the proposed development (the insufficient information that has been submitted to demonstrate that the public house would remain viable despite the significant loss of internal floorspace), when assessed against the policies in the NPPF taken as a whole, but including in particular paragraphs 126, 130 and 134 of the NPPF.

Having considered the proposal against the backdrop of housing need, Officers are not satisfied that the development would comply with the objectives of the above policies.

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

Other Material Considerations:

None.

CIL

Mayor's Community Infrastructure Levy 2 (CIL2):

The development is liable for the Mayor's Community Infrastructure Levy 2

Royal Borough of Greenwich CIL:

The development is liable for the Greenwich Community Infrastructure Levy

Recommendation:

The proposal is considered to be unacceptable and is therefore recommended to the delegated officer for **refusal** for the reason set out in the decision notice.