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**PLANNING APPLICATION
BY**

MRS K BUTLER

RELATING TO

**THE PROPOSED CONVERSION OF AN EXISTING STABLE BLOCK
TO FORM A NEW TWO BEDROOM DWELLING
AT**

**ROUND HOUSE STABLES
39 NORTH CRAY ROAD
BEXLEY
KENT
DA5 3ND**



PLANNING STATEMENT

OUR REF: JA/20/256

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1. INTRODUCTION

- 1.1. We are instructed to prepare and submit this planning application seeking permission for the conversion of an existing stable block at Round House Stables to form a new detached residential property. This will be in a form of a single storey two bedroom dwelling.
- 1.2. The applicant has engaged a project team to undertake a full analysis of the existing building and the feasibility of its conversion as proposed. This application is supported by the following documents:
 - A set of existing and proposed planning drawings prepared by CWA.
 - A Structural and Space Standards Statement in support of the proposal prepared by CWA.
 - An Ecological Report prepared by Native Ecology.
- 1.3. We have undertaken a visit to the application site and are familiar with the surrounding area. The main issues to be considered in this case are whether, in principle, the proposed conversion and alteration to the building represent an appropriate form of development within the Green Belt, and whether the proposal is compliant with the objectives of all relevant planning policies contained within the National Planning Policy Framework (NPPF), the Bexley Core Strategy (2012) and the Saved Policies of the Bexley Unitary Development Plan (2004).
- 1.4. With all matters considered it is submitted that this development proposal is compliant with all relevant planning policy considerations and, accordingly, planning permission should reasonably be granted.

2. THE APPLICATION SITE AND SURROUNDING AREA

- 2.1. Round House Stables is a detached stable block located on the southern side of North Cray Road. It is set well back from the road with an existing access point located to the north of the site.



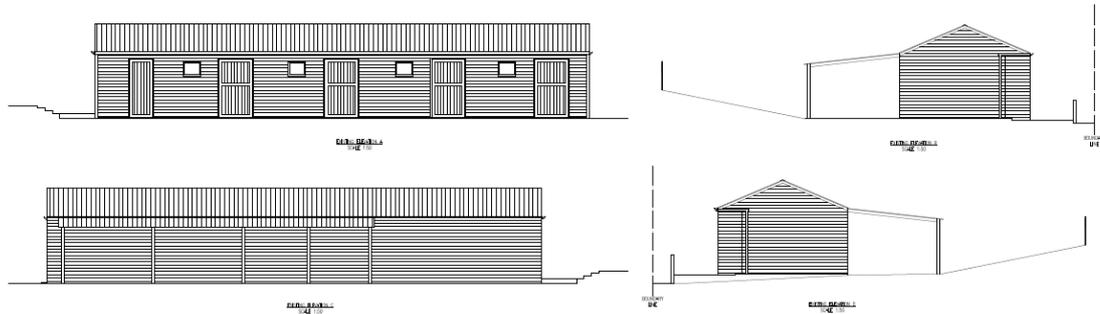
- 2.2. The site is not located within a designated Conservation Area and the buildings are not the subject of any statutory or local Listing. As a private stable block, the site represents '*previously developed land*' in the terms of the NPPF.
- 2.3. A single storey building with a dual pitched roof, the stables are constructed on concrete strip footings and is largely of timber construction. It has a footprint of approximately 89m².
- 2.4. There is an existing area of hardstanding to the front of the building with the remainder of the site largely comprising grassed areas save for the access track leading to North Cray Road.
- 2.5. A detailed Structural Assessment of the existing building is contained within the 'Structural and Space Standards Statement' prepared by CWA. This report confirms that the building is a permanent structure which is capable of conversion.

3. RELEVANT PLANNING HISTORY

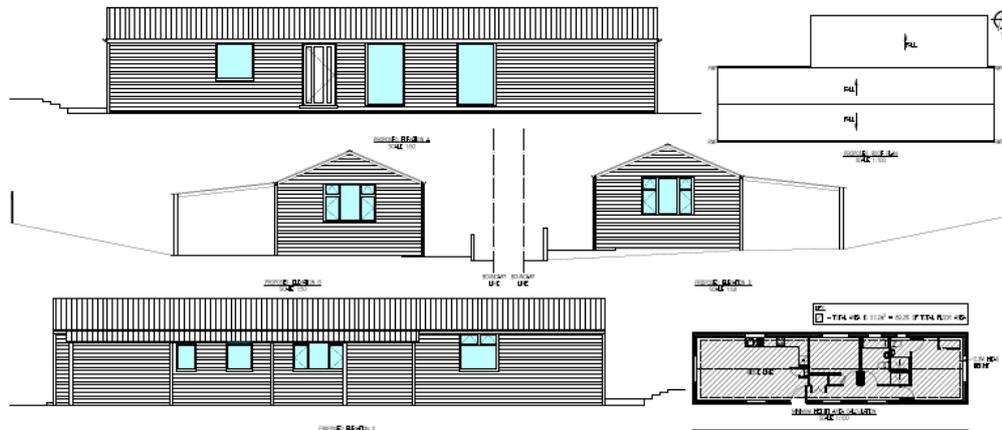
- 3.1. The Council's online planning history records indicate that planning permission was granted in 1990 under reference 90/00793/FUL for '*portable stables with tack room/food store*'.
- 3.2. Thereafter, under reference 91/00405/FUL, further planning permission was granted for the erection of '*detached building comprising of four stables and tack room/food store and provision of two car parking spaces*'. This approval was implemented, and the stable block has been in existence for in excess of 30 years.
- 3.3. The building is, therefore, lawful and of a permanent and substantial construction which is capable of being converted.

4. THE APPLICATION PROPOSAL

4.1. As per the submitted drawings the proposal is to convert the existing building into a generous two bedroom dwelling alongside a series of modest and sympathetic external alterations to facilitate the proposed use.



Existing elevations

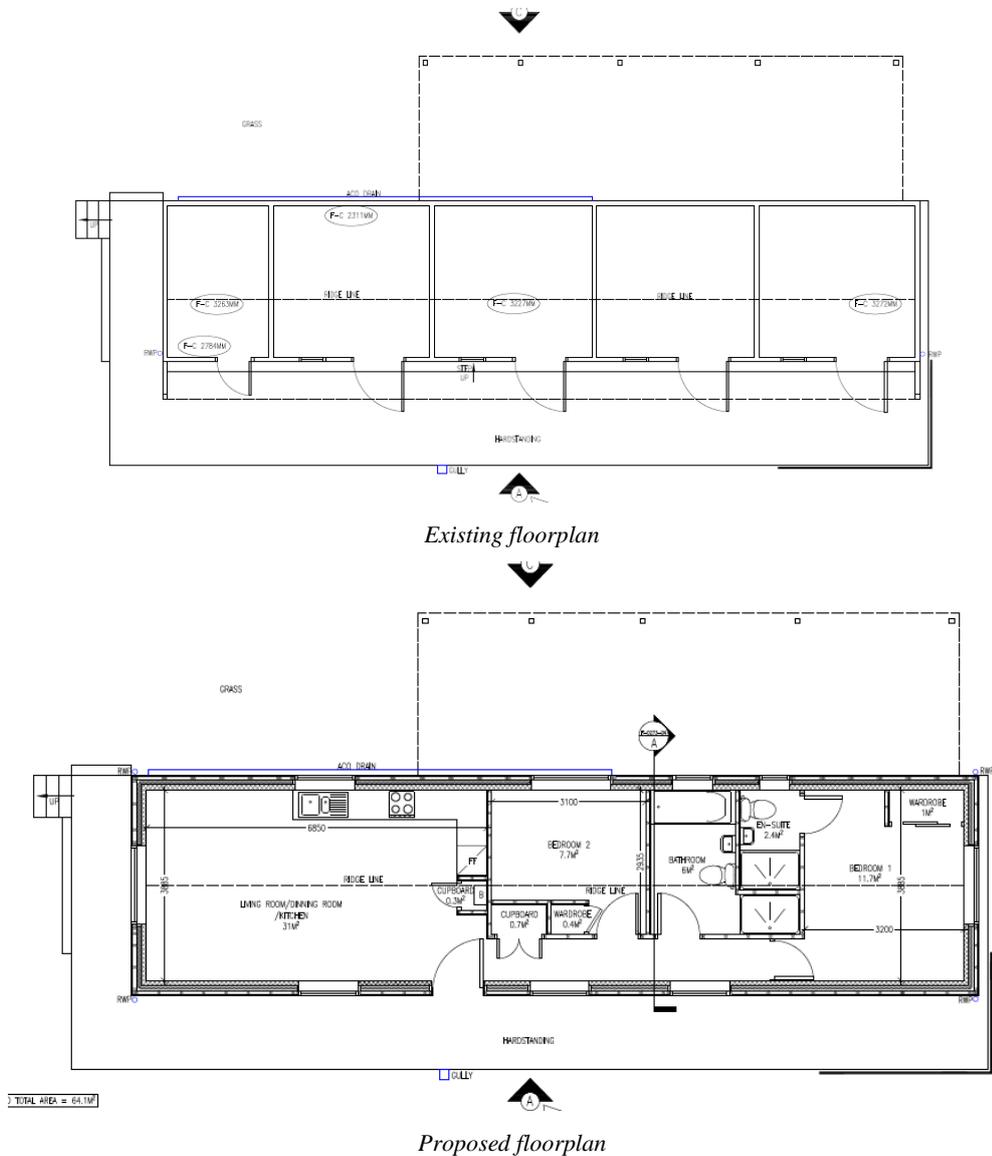


Proposed elevations

4.2. The proposal seeks to convert the existing structure and, as such, there will be no material change to the scale or massing of the building and no material impact on the wider openness of the surrounding area. The overall gross internal area of the resulting dwelling will be around 89m² which is in well in excess of the nationally described space standard for a two bedroom/three person unit. The minimum requirement is 61m².

4.3. The layout will comprise the main kitchen/living/dining room area on the eastern side of the building with two bedrooms alongside en-suite and bathroom facilities making up the

remainder of the dwelling. The unit will be dual aspect and will provide well-proportioned, logical accommodation.



- 4.4. The building’s location within the site will remain as it is now. A series of new windows and doors will be provided within the front, rear and side elevations alongside replacement external cladding in the form of new timber horizontal cladding to match the existing building. It will also be painted to match the existing colour scheme.

- 4.5. Outside the scheme will utilise the existing access track and pre-existing parking area to provide designated car parking space and a suitable turning area. The scheme will not affect the parking arrangements of the existing building.

- 4.6. Given the building's positioning set well back from North Cray Road itself and the existing vegetative screening along the boundaries, the building will not be particularly visible from any public viewpoints. It is not proposed to remove any trees or bushes of any significance from the site.

5. RELEVANT PLANNING POLICY CONSIDERATIONS

5.1. Of relevance to this application are the strategic policies in the National Planning Policy Framework (NPPF) (2021), the London Plan (2021), the Councils Core Strategy (2012), and any Saved Policies of the Bexley Unitary Development Plan (2004).

National Planning Policy Framework (2021)

5.2. The main purpose of the revised Framework remains to achieve sustainable development through a plan-led system. The presumption in favour of sustainable development remains and, if development is sustainable, this should go ahead without delay.

5.3. The Government continue to recognise that design is indivisible from good planning, and that high quality design is a key aspect of sustainable development. Paragraph 127 seeks to ensure that development proposals add to the overall quality of the area, are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping, and are sympathetic to local character and history.

5.4. Paragraph 134 recognises that whilst poor design which fails to take opportunities available for improving the character and quality of an area should be avoided, design which reflects local design policies or any adopted design codes is encouraged. Outstanding or innovative design which promotes a high level of sustainability or helps to raise the standard of design more generally, along with design which fits the 'overall form and layout of their surroundings' is also encouraged.

5.5. Paragraph 138 explains that the Green Belt serves five purposes:

- *To check the unrestricted sprawl of large built up areas.*
- *To prevent neighbouring towns from merging into one another.*
- *To assist in safeguarding the countryside from encroachment.*
- *To preserve the setting and special character of historic towns; and*
- *To assist in regeneration by encouraging the recycling of derelict and other urban land.*

- 5.6. Paragraph 147 confirms that as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 5.7. Paragraph 149 sets out that the construction of new buildings should be regarded as inappropriate unless any of the exceptions in bullet points a) to g) can be applied. This includes the complete or partial redevelopment of 'previously developed land'.
- 5.8. Paragraph 150 is highly relevant and sets out that a local planning authority should regard certain forms of development in the Green Belt as 'not inappropriate' – this includes paragraph 150 d):

d. The re-use of buildings provided that the buildings are of permanent and substantial construction

The London Plan (2021)

- 5.9. Policy D1 'London's form and characteristics' provides a policy framework for delivering good design. This includes assessing an area's characteristics and establishing the capacity for growth of different areas. Developments should be responsive to each site's context.
- 5.10. Policy D4 'Delivering good design' requires all development to make the best use of land by following a design-led approach. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context. Development should respond positively to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to building types, forms and proportions. Development should deliver appropriate outlook, privacy and amenity spaces while responding to existing character and any special and valued features and characteristics that are unique to the locality. They should contribute towards local character and be of a high quality.

- 5.11. Policy D6 'Housing Quality and Standards' requires all residential development to be of a high quality and in accordance with the minimum internal space standards set out in Table 3.1 of the Plan. In relation to amenity space a minimum of 5m² should be provided for 1-2 person dwellings, with an extra 1m² per additional occupant.
- 5.12. Policy H2 of the new London Plan relates to 'small sites' and expressly sets out support for the delivery of new residential accommodation on smaller development sites. The substantial benefits which can be attributed to a greater contribution towards housing delivery from small sites is recognised as a strategic priority in the Plan. The weight which should be attributed to housing delivery is very substantial; this is considered to be a significant material consideration in the determination of this application

Bexley Core Strategy (2012)

- 5.13. The Council's Adopted Core Strategy sets the overarching vision for the Borough. Policy CS01 of the Core Strategy focuses on achieving sustainable development and requires for applicants to maximise the effective and efficient use of land, to contribute to the health and wellbeing of the community and the environment. It also seeks to ensure that new housing provision meets the needs of Bexley's current and future population.
- 5.14. Policy CS17 relates to 'Green Infrastructure' and seeks to protect Green Belt land from 'inappropriate' development.

Saved Policies of the Unitary Development Plan (2004)

- 5.15. A number of the policies relevant to the determination of planning applications have been saved, where they have not been superseded by the adoption of further policy. Of relevance in this instance are the following saved policies.
- 5.16. Policy ENV8 states that the reuse of buildings in the Green Belt may be appropriate provided that: it does not have a materially greater impact than the present use on the openness of the Green Belt or the purposes of including land in the Green Belt; any extension or reused buildings and associated uses of land surrounding the building

preserve the openness of the Green Belt and the purposes of including land in the Green Belt (for example external storage, hard standing, car parking, boundary walling or fencing); the buildings are of permanent and substantial construction and are capable of conversion without major or complete reconstruction; and the form, bulk and general design of the buildings are in keeping with their surroundings.

- 5.17. Policy H6 relates to provision of 'adequate' usable amenity space provision on site. This can include gardens, balconies, terraces and roof gardens. The policy states that development should 'normally' provide adequate usable on-site amenity space, recognising that site constraints and context may make this unachievable. In such circumstances residential units will be expected to take account of the relevant London Plan/Mayor's Housing SPG amenity size requirements in terms of gross internal areas (GIA).
- 5.18. Policy H7 seeks to ensure a reasonable degree of privacy and outlook for space within and outside dwellings.
- 5.19. Policy H9 relates to residential development consisting of extensions/alterations to buildings and sets out the following criteria: the siting, design and external appearance of development should be compatible with the character of the existing building and adjacent buildings; the development should not adversely affect the privacy and amenity of residents of adjoining properties including daylight and sunlight and outlook; and the development should not result in over development in terms of scale and mass, car parking and remaining amenity area.
- 5.20. Policy T17 relates to car parking, with the Council's parking standards set out in Appendix 1 of the UDP. The Council is clear that in applying the car parking standards to individual site proposals, the following factors will be taken into account: the availability of public transport; the presence of on-street parking controls to deter parking; and the availability of public off-street parking opportunities.

OTHER MATERIAL CONSIDERATIONS

National Design Guide (2019)

- 5.21. In 2019 the Government introduced the National Design Guide (NDG) which sets out that the underlying purpose for design quality and the quality of new development at all scales is to create well-designed and well-built places that benefit people and communities.
- 5.22. Section 1 of the NDG sets out that new development may draw its inspiration from the site, its surroundings or a wider context, or it may also introduce 'new approaches to contrast with, or complement, its context'.
- 5.23. Importantly, the National Design Guide recognises that well-designed places do not need to copy their surroundings in every way. Local authorities are urged to welcome elements that reflect how we live today, and include innovation or change such as increased densities, or to incorporate new sustainable features or systems. It is clear, therefore, that there is no requirement at a national level to copy or replicate existing characteristics in order to create a sustainable development.

Design and Development Control Guidelines

- 5.24. The Council has further guidance relating to new residential development which seeks to ensure that new developments provide a high standard of accommodation in terms of design and layout.

6. PLANNING ASSESSMENT

6.1. The main issues to be considered in this instance are whether the development is appropriate in the Green Belt, and whether the proposal would have a detrimental impact on the openness of the surrounding area. Any impacts on any nearby residential amenities are also a key consideration, alongside any ecological impacts or effect on the surrounding highway network.

Appropriate development in the Green Belt?

6.2. There can be no objection, in principle, to the conversion of the existing buildings having due regard for paragraph 149(d) of the NPPF. The relevant saved policies of the UDP (policy ENV8) also allow the conversion and reuse of existing buildings in the Green Belt. Furthermore, as 'previously developed land', national policy contains provision for suitable redevelopments in Green belt locations providing the 'openness' of the Green Belt is not substantially harmed. No such harm will arise in this case.

6.3. Policy ENV8 requires that any proposal (including any re-use) should not have a materially greater impact than the present use on the openness of the Green Belt or harm the existing character of the area. In this respect, the building will be of the same size, height and positioning within the site, resulting in no harm to the existing character. The external appearance of the building will be improved with modest alterations.

6.4. The policy also requires that the building is capable of conversion without '*major or substantial construction*'. To that end, the structural appraisal carried out by CWA clearly concludes that the subject building is suitable for conversion into domestic residential use without the need for any major structural modifications or alterations. It is clear from both the planning history and historic aerial images, alongside a visit to site, that the host building is a permanent and lawful structure and would not require any significant reconstruction in order to facilitate the proposed conversion.

6.5. In accordance with the requirements of the Council's policy, the structural assessment of the building demonstrates that is able to retain the existing foundations, while the walls and roofs will be sympathetically upgraded, with new openings introduced into the

elevations. The evidence provided clearly demonstrates that the building is capable of conversion satisfactorily.

- 6.6. Accordingly, the proposal represents appropriate development that would not harm the openness of the Green Belt and meets the requirements of the NPPF and saved policy ENV8. It is not 'inappropriate' development in the terms of the NPPF.

Any impact on 'openness', the character of the area or any other harm

- 6.7. The proposed use of the building as a self-contained dwelling will have very little overall impact on the prevailing character of the immediate area when considered in the context of the overall site. The dwelling will sit comfortably against the nearest residential property, No.37, to the north.
- 6.8. The development utilises the existing access and the proposed use of materials and associated soft landscaping ensures a satisfactory appearance in light of the site's location within the Green Belt.
- 6.9. The resulting dwelling will be of a high standard of design, preserving the existing architectural flavour whilst utilising a n upgraded palette of materials to facilitate a residential use. The development will not detract from the overall character of the original building.
- 6.10. The provision of two parking spaces within the site is as per the existing setup and is sufficient to serve the proposed use. There will be no material impact upon the surrounding highway network or parking provision arising from the reuse of the existing building as proposed.
- 6.11. The resulting dwelling would be well separated from No.37, with the relationship between the two buildings largely unchanged. There are no other surrounding residential properties. There is not considered to be any overlooking or loss of privacy nearby or any harm caused to nearby residential amenities. There is, therefore, no conflict with the Council's policies as a result.

Ecological and biodiversity impact

- 6.12. Given that the proposal seeks to reuse an existing building in the Green Belt, the applicants have instructed Native Ecology to undertake an ecological appraisal of the site. Their report accompanies this application.
- 6.13. The assessment confirms that a Preliminary Ecological Appraisal (PEA) and site visit was undertaken in March 2021. The result of the preliminary bat roost assessment confirms that no potential roost features, bats or evidence of bats was observed in either the buildings to be converted.
- 6.14. No further surveys were recommended prior to the conversion of the relevant building. However, section 10 of the appraisal sets out the recommended biodiversity enhancement measures which will be incorporated into the scheme. This includes the installation of bat boxes to enhance opportunities for roosting bats and also bird boxes to encourage different species of bird; these are to be installed at a height of at least 2.0m on suitable retained vegetation.
- 6.15. From the evidence provided it is clear that there are no ecological reasons to preclude planning consent being granted. The findings and recommendations of the PEA can be secured by a suitably worded planning condition.

7. CONCLUSION

- 7.1. In light of the foregoing and all other material considerations in this case, it is submitted that the proposal represents a development which is appropriate in the Green Belt, resulting in no overall material harm to the openness of the site or the wider area. Existing residential amenities nearby would be preserved, with no material impact in this respect.
- 7.2. Adopted national policy within the NPPF allows for the reuse of existing buildings in the Green Belt. The development is therefore compliant with paragraph 149(d) of the NPPF, as well as being in complete accordance with the requirements of saved policy ENV8. Overall, there will be no conflict with any of the five purposes of the Green Belt as set out within paragraph 138 of the NPPF. Indeed, there will be a material improvement to the external appearance of the building arising from the modest alterations proposed overall, such that the visual quality of the site will improve.
- 7.3. Having due regard for the context of the site there is also no conflict with the NPPF policies or with the overall objectives of the Council's Core Strategy, and any relevant saved policies of the Unitary Development Plan. Accordingly, it is considered that planning permission should reasonably be forthcoming for this proposal.
- 7.4. It is therefore respectfully suggested that planning permission should reasonably be granted, subject to any necessary planning conditions.