



colin**smith**planning

PLANNING DESIGN AND ACCESS STATEMENT

REF: BEX/21/01

DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF NEW DWELLING

REAR OF 76 AND 78 ALBERT ROAD, BEXLEY, DA5 1NW

SEPTEMBER 2021

Colin Smith BA (Hons) MRTPI | M: 07879 472627 | colin@colin-smith-planning.co.uk | The Logans | 146 Brambletye Park Road | Redhill | Surrey | RH1 6ED

Colin Smith Planning Limited is a company incorporated in England. Company registration number 8608141



SECTION

1.0	SUMMARY
2.0	SITE AND CHARACTER APPRAISAL
3.0	PLANNING HISTORY
4.0	PROPOSAL
5.0	POLICY CONTEXT
6.0	MAIN ISSUES
7.0	CONCLUSIONS



1.0 SUMMARY

- 1.1 This Planning Design and Access Statement has been prepared to support the proposal for the demolition of the two existing buildings on the site and the erection of a new dwelling on land to the rear of 76 and 78 Albert Road, Bexley.
- 1.2 The proposed development represents an efficient use of land that falls within the definition of previously developed land and would make a positive contribution to the Council's housing supply requirement. The site has a PTAL rating of 3 and is therefore reasonably accessible for local shops and services that are located nearby and public transport connections.
- 1.3 This Planning Design and Access Statement demonstrates that the proposal complies with the policies of the development plan and the recently revised NPPF, constitutes a sustainable form of development, and should therefore be granted planning permission without delay.



2.0 SITE AND CHARACTER APPRAISAL

- 2.1 The application site comprises land to the rear of 76 and 78 Albert Road. The land is currently occupied by two buildings used for garaging and storage, but on a non-commercial basis. One of the buildings (Barn 1) is located along the northern boundary adjacent to the garden with no. 80, and the other building (Barn 2) is located to the western boundary, up against the boundary of the rear gardens of 1A and 1B Parkhurst Road. Barn 1 has a height to the top of the ridge of 4.088m, and Barn 2 has a height to the top of the flat roof of 2.2m. The land falls within the definition of previously developed land set out in the glossary to the National Planning Policy Framework (NPPF). There are no landscape features of note on the site.
- 2.2 Access to the site is via a driveway between nos. 76 and 74 Albert Road. The driveway serves the buildings the subject of this development proposal, and a range of other buildings arranged in a courtyard also used for garaging and storage.
- 2.3 The wider area consists of a mix of house types, but mainly blocks of two storey terraces and semi-detached dwellings. Properties are built close together and generally close to the back edge of the



colin**smith**planning

footway, and there is a strong sense of enclosure to the streetscene, and a perception of high-density development.

Colin Smith BA (Hons) MRTPI | M: 07879 472627 | colin@colin-smith-planning.co.uk | The Logans | 146 Brambletye Park Road | Redhill | Surrey | RH1 6ED

Colin Smith Planning Limited is a company incorporated in England. Company registration number 8608141



3.0 PLANNING HISTORY

- 3.1 According to the Council's website, there is no planning history recorded for the property on the Council's website.

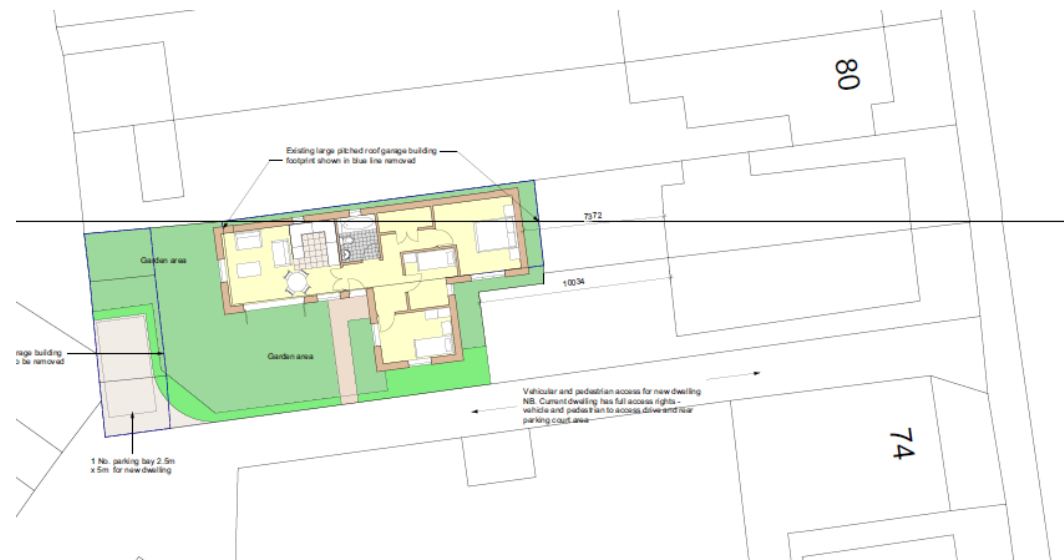


4.0 PROPOSAL

- 4.1 The proposed development is for the demolition of the existing buildings on the site and the erection of a new detached dwelling. Prior to submitting the application, a pre application meeting was carried out, and the current proposal has been developed following the advice given. At the pre application stage, the development was proposed to be a 3 bedroom/5 person dwelling and 'T' shaped in plan form. The long length of the proposed building was shown to be sited towards the northern boundary approximately on the footprint of Barn 1, with the projection towards the south. The proposed building was shown to be sited towards the eastern side of the plot, with the main garden area to the west. Two parking spaces were provided to the western boundary. The main garden area and the proposed parking spaces were to be in the location of Barn 2.
- 4.2 The submitted application has been revised following the advice given by the case officer. In summary, the dwelling has been re-sited to be located further from the existing dwellings at 76 and 78 Albert Road, and towards the western end of the plot. The dwelling is now proposed to be a 2 bed/4 person dwelling, with an internal floor area of 70 sqm (to meet the national described space standards).



- 4.3 The proposed dwelling is single storey and with a low pitched roof in order to minimise the impact on the surrounding residential properties, with a maximum height to the ridge of 4.2m. The proposed dwelling remains a 'T' shape in plan form. A car parking space is proposed at the western end of the site in the same location as the existing barn. The site layout for the pre application scheme and the current scheme are shown below for comparison purposes:



Pre application scheme



Current application scheme

- 4.4 The site will be defined by a 1.8m close boarded fence to the west, north, east and part of the southern boundary. The garden and amenity areas will be laid to lawn with domestic planting. An integrated bin store and cycle parking store is proposed at the north-western corner of the building behind the car parking space.



- 4.5 The external finishing materials would consist of white render and vertical cladding to the elevations, with an artificial slate roof.



5.0 POLICY CONTEXT

Development plan

- 5.1 The development plan for the area consists of the London Plan adopted in March 2021, the Core Strategy, adopted in 2012, and the saved policies of the Unitary Development Plan (UDP) adopted in 2004.
- 5.2 The current London Plan was adopted in 2021 and the following policies are relevant;
- GG2 Making the best use of land
 - GG4 Delivering the homes Londoners need
 - D6 Housing quality and standards
 - H1 Increasing housing supply
 - H2 Small sites
 - T6.1 Residential parking



5.3 The following Core Strategy policies are relevant;

- CS08 Adapting to and mitigating the effects of climate change, including flood risk management
- CS16 Reducing the need to travel and the impact of travel

5.4 The following saved policies of the UDP are relevant;

- H3 - character of local residential area - criteria to ensure compatibility
- H6 - residential development - amenity space
- H7 - residential development - privacy and outlook
- H8 - residential development - infill, backland and similar development

Other material considerations

5.5 **National Planning Policy Framework (NPPF)** - a revised version of the NPPF was published in July 2021, which supersedes the earlier February 2019 publication. This newly published document carries significant weight as a material consideration.

5.6 Paragraph 10 sets out that *“so that sustainable development is pursued in a positive way, at the heart of*



the Framework is a presumption in favour of sustainable development". Paragraph 11 identifies that for decision making, this means;

- *“approving development proposals that accord with an up-to-date development plan without delay; or*
- *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:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - 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.”*

5.7 Paragraph 130 of the NPPF is part of the section relating to achieving well designed places. A number of bullet points require planning decisions to ensure that developments;

- *“are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *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);*



- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development.....”*



6.0 MAIN ISSUES

6.1 Having regard to the policy context, the main issues to consider are as follows;

- The principal of development;
- Impact on the character of the area;
- Impact on the amenity of adjoining properties and future occupiers;
- Parking and access.

Principal of development

6.2 The site is located within the built-up area of Bexley and is within an area characterised by residential development. Policy GG2 of the London Plan sets out that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land and proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development. In addition, policy GG4 sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure



that more homes are delivered. In the 2020 Housing Delivery Test calculation, the Council were unable to demonstrate that the required five-year housing supply could be met. As a result, there is a requirement to increase the delivery of housing, and the case officer's letter at the pre application stage confirmed that the proposal would result in an increase of one net self-contained dwelling, contributing, "*albeit modestly*", to regional and local housing targets. It should be noted that the policies of the recently adopted London Plan encourage greater delivery of housing to meet the identified needs.

- 6.3 In the pre application response from the case officer, it was noted that the demolition of the two existing dwellings would be acceptable, as the "*two outbuildings are currently used for storage and are in a poor state of repair. They are completely incongruous within the wider character of the area and as such their loss is considered acceptable in principle.*"
- 6.4 Also in relation to the principal of the development, the case officer at the pre application stage confirmed that in relation to saved policy H8, the development would meet criteria 1 and 4, but not criteria 2 and 3. Criteria 2 and 3 require development to be adequately separated from other dwellings in terms of their amenities, light, privacy and garden space, and that there would be no adverse impact on the character of the area. The case officer considered that the pre application proposal failed against criteria 2 and 3 as that development would not provide adequate standards of accommodation and it would be an overdevelopment of the site. However, for the reasons set out below, it is submitted that the current development has overcome these issues and concerns.



- 6.5 In relation to criterion 2, the previously submitted scheme was for a 3 bed/5 person dwelling with a floor area of 73 sqm. The national minimum standards (which are included within the development plan) require a dwelling of this level of accommodation to be a minimum of 86 sqm in floor area. In addition, the case officer noted that the outlook from bedrooms 1 and 2 and then proposed would be directly on to a boundary fence, with the outlook from the living room/kitchen area also unacceptable. However, the reduction of the scheme to a 2 bed/4 person dwelling, and the re-siting and re-orientation of the dwelling and some of the internal spaces has resulted in an improved outlook from all habitable rooms, with none of them looking directly out onto a fence or boundary wall.
- 6.6 The case officer's comments in relation to criterion 3 of policy H8 referred to the fact that the pre application scheme was a three bed dwelling, and that "*whilst there is potentially scope for a new dwelling of some sort on the land, it is likely that this will have to be, at best, a two-bedroom property.*" The current scheme has been reduced to a two bed/4 person dwelling and has resulted in less built form on the site. It is submitted that the current development is no longer an overdevelopment of the site and that criterion 3 is met.
- 6.7 Given the changes made to the development following the pre application engagement, it is submitted that the development complies with policy H8. In addition, due to the character of the area being predominantly residential, and the brownfield land status of the site, and the encouragement in the London Plan to consider the intensification of existing areas to increase the delivery of housing units, it is submitted that the principal



of residential development should be supported.

Impact on the character of the area

- 6.8 The local area is characterised by semi-detached and terraced dwellings. However, policy H2 of the London Plan sets out that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to significantly increase the contribution of small sites to meeting London’s housing needs and to diversify the sources, locations, type and mix of housing supply. The policy also sets out that Boroughs should recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites. This makes clear that the priority should be towards the increase in the supply of housing rather than requiring development proposals to rigidly follow the pattern and appearance of the local area.
- 6.9 Saved policy H3 of the UDP requires development primarily in residential area should be compatible with the character or appearance of the area. The proposed dwelling is single storey and located to the rear of nos. 76 and 78. Whilst this, on the face of it, does not reflect the character of the area, which is primarily two storey terraced and semi-detached dwellings having a road frontage, the policies of the London Plan, which is more recent than the UDP, and based on the most up to date evidence, give priority to increasing the delivery of



housing.

- 6.10 The application site is located to the rear of existing dwellings fronting Albert Road, and is therefore not highly visible from general public vantage points. Notwithstanding this, the existing buildings on the site cover a footprint of 110 sqm and are in a poor state of repair. The case officer acknowledges *“the outbuildings are of limited visual value and their loss would be acceptable.”*
- 6.11 In their place would be a well designed new building, occupying a significantly smaller footprint of the site and finished in high quality contemporary materials. The building proposed would have a footprint of 70 sqm, and would be a maximum of 4.1m in height to the ridge of the roof (compared to Barn 1 towards the northern boundary which is 4.088m). The development would be finished in white render with contrasting black vertical cladding, and a slate tiled roof.
- 6.12 The case officer noted in the pre application response letter that *“whilst the proposal is discreetly located and inoffensive in design, the scale of the proposal is excessive for the size of the plot it sits upon. It is unlikely that a three-bedroom house would be able to fit adequately within the site and provide suitable standards of both internal and external amenity.”* However, as identified above and below, the size of the proposed dwelling has been reduced and there are appropriate and suitable levels of amenity provided.



- 6.13 Given the above, it is submitted that the proposed development does in fact comply with development plan policies in relation to the character of the area, particularly in the light of the more recently adopted policy H2 of the London Plan, and the recently published NPPF, and results in the effective and efficient use of this previously developed land for the delivery of housing without resulting in harm to the character of the area.

Impact on the amenity of adjoining properties and future occupiers

- 6.14 Saved UDP policy ENV39 states development should not prejudice the environment of the occupiers of adjacent property in terms of outlook, light and privacy.
- 6.15 The pre application letter received from the case officer noted that although there would be a reduction in the garden area of no. 76 Albert Road, it would be left with approximately 50 sqm of amenity space, which was considered to be acceptable. With the current proposal, the depth of the rear garden to no. 76 has been increased from 10.034m to 10.586m, resulting in slightly larger rear garden area for no. 76. The case officer acknowledged that in all other respects, there would be no harmful impact on the amenities of no. 76.
- 6.16 Equally, the case officer concluded that there would be no harmful impact on the amenities of no. 78, given that the existing building would be demolished and replaced with another, smaller building. Whilst the proposed building for this application is slightly higher to the ridge than the previous pre application building,



it is set further away from the rear elevation of no. 78 and would therefore improve the outlook from the existing dwelling. There would be no other harmful impact on no. 78 as a result of the development.

- 6.17 In relation to 1A and 1B Parkhurst Road, the proposal would involve removing an existing outbuilding which currently runs along the rear of the two dwellings, improving outlook, light and sense of openness.
- 6.18 The case officer noted at the pre application stage that an *“informal way to measure the potential harm of a development is to draw a 45 degree line upwards from a height of 2m along the neighbours boundary wall. Any part of the development that sits underneath the line is likely to be acceptable, any part of the development that projects above this line would be considered harmful. Using the plans provided Officers have undertaken this procedure and found that the new building would comply. This would need to be clearly evidenced by the applicant as part of any formal planning application, though.”* Whilst this appears to be an “informal” assessment, without a basis in policy, the submitted drawings identify that this requirement is achieved.
- 6.19 In relation to the amenities of future occupiers of the dwelling, the internal floorspace and the size of the individual rooms meet the national described space standards adopted within the London Plan. In terms of outdoor amenity, the London Plan requires a minimum of 5 sqm of private outdoor space for 1-2 person dwellings and an extra 1sqm per additional occupant. London Plan policy D6 states that new development should maximise usability of outdoor amenity space. Saved UDP policy H6 states residential development



should normally provide adequate usable on-site amenity space. The amount of amenity space provided exceeds the required standards and should therefore be considered acceptable. However, whilst at the pre application stage there were concerns raised in relation to outlook from habitable rooms directly onto the enclosing fence, the redesign of the house has resulted in this issue being overcome.

- 6.20 As a result of the above, it is submitted that the proposed development will not result in harm to the amenities of adjoining properties, and the level of amenity for future occupiers will be suitable and adequate, and therefore the policies of the development plan in relation to these issues are complied with.

Parking and access

- 6.21 Policy T6.1 of the London Plan sets out that new residential development should not exceed the maximum parking standards set out in Table 10.3 of the Plan. For a site in the outer London Boroughs, with a PTAL rating of 2-3, the maximum number of parking spaces should be 0.75 spaces. One space is provided in the proposed development which is considered to be suitable and appropriate. The policy also requires all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles, and this can be provided and secured by condition. The existing site has two parking spaces already and there will be no change to the current access and parking arrangements in the adjacent garage court area.



- 6.22 London Plan Policy T5 and Table 10.2 set cycle provision standards which for this development would require covered, secured and convenient cycle storage of two bicycles. This is provided as shown on the submitted plans.
- 6.23 The London Plan also requires waste and recycling facilities should be convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services. In this case, a refuse store is shown on the submitted drawings and it is anticipated that future occupier would place the bins at the access to the site in order for them to be collected, in the same way as other residents in the street.
- 6.24 It is understood from the pre application response that subject to the above, the development should be acceptable in highway and parking terms.



7.0 CONCLUSIONS

- 7.1 The proposed development should be acceptable in principle, given that it is within the built-up area and that the development will contribute towards the identified housing requirement for the Borough. In particular, the most recent policies, set out in the London Plan, encourage the use of higher density development on smaller sites in order to maintain high levels of delivery. In addition, the NPPF encourages innovation and change, which includes achieving higher density development. Both of these policy documents are material considerations to be given substantial weight.
- 7.2 Given the new policy context set out in the recently adopted London Plan, which is based on the most recent and up to date evidence, it is submitted that the proposed development would not result in harm to the character, history and local distinctiveness of the surrounding area.
- 7.3 No harm will result from the development in relation to the amenities of the adjoining properties. There will be no direct overlooking, loss of privacy, significant loss of light or overbearing impact. The environment created for the potential occupiers of the development will be satisfactory, and the adopted space standards will be met.



- 7.4 Given the location of the site and its PTAL rating, the car parking provision is justified and in accordance with the maximum parking standards. The provision of this level of parking will encourage alternative modes of transport other than the private car.

- 7.5 It is submitted therefore that the proposed development does not conflict with the policies of the development plan, and the previous reasons for refusal have been overcome. As a result, it falls within the definition of sustainable development set out in paragraph 11 of the NPPF, and should therefore be granted planning permission without delay.