



# ROBINSON ESCOTT PLANNING LLP



CHARTERED TOWN PLANNING AND DEVELOPMENT CONSULTANTS

DOWNE HOUSE, 303 HIGH STREET, ORPINGTON, KENT BR6 ONN, TEL:01689 836334 FAX: 01689 878091

Email: [enquiries@replanning.co.uk](mailto:enquiries@replanning.co.uk) Website: [www.replanning.co.uk](http://www.replanning.co.uk)

**PLANNING APPLICATION  
BY  
ACORN PLANNING MANAGEMENT  
RELATING TO THE PROPOSED REDEVELOPMENT OF  
28 BELLEGROVE ROAD  
WELLING  
KENT  
DA16 3PY**



---

## PLANNING STATEMENT

---

**OUR REF: JA/21/03**

JOHN ESCOTT BA (HONS) DipTP MRTPI PETE HADLEY BA (HONS) DipTP MRTPI JOE ALDERMAN MA MRTPI  
NEAL THOMPSON BSc (HONS) MSc MRTPI RACHEL ESCOTT BA (HONS) DipTP  
CONSULTANT: BOB MCQUILLAN BA (HONS) MCD MRTPI MRICS

## 1. INTRODUCTION

- 1.1. This planning statement has been prepared on behalf of Acorn Planning Management in support of an application proposing the demolition of the existing building and yard area at 28 Bellegrove Road, Welling and the construction of a replacement mixed-use building.
- 1.2. The scheme comprises a flexible commercial (Use Class E) space at ground level fronting Bellegrove Road and Deepdene Road, with 7 residential units in a part 2/part 3/part 4 storey replacement building. The units will comprise 4 x one-bedroom flats and 3 x two-bedroom flats.
- 1.3. In line with the guidance within the NPPF, the applicants engaged with the Council on a pre-application basis, with discussions taking place in late 2020. The Council's response was received early in 2021 and has informed this proposal.
- 1.4. This statement should be considered alongside a full set of planning drawings and a detailed Design and Access Statement prepared by the architects, ON Architecture, as well as a Transport Statement prepared by Pulsar Transport Planning.
- 1.5. This Planning Statement has been prepared following a detailed inspection of the site and surrounding area and a full review of all relevant adopted policies including those within the National Planning Policy Framework (2021), the London Plan (2021), the Bexley Core Strategy (2012) and the saved policies of the Bexley UDP.
- 1.6. In our assessment this proposal represents a suitable and appropriate redevelopment of the site in a sustainable and accessible location. We would contend, therefore, that planning permission should reasonably be forthcoming.

---

## 2. THE APPLICATION SITE AND SURROUNDING AREA

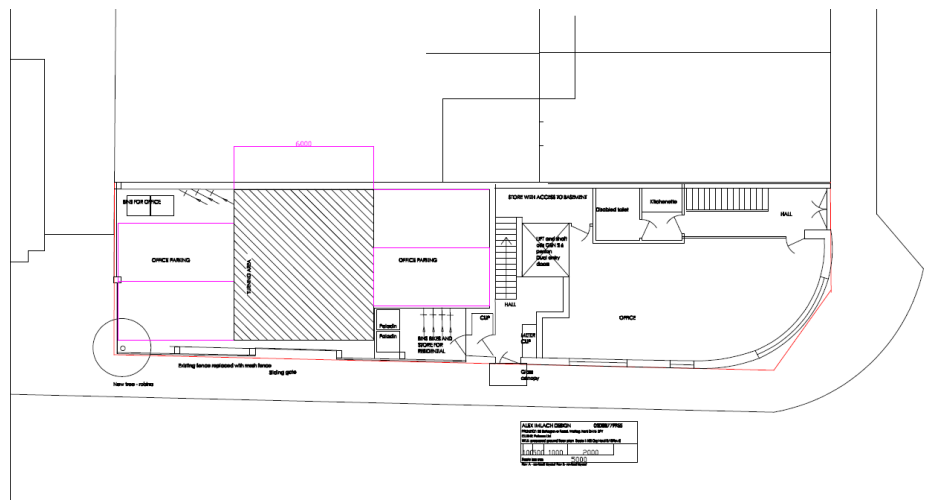
- 2.1. Currently occupied by a two storey end of terrace property, the existing building is something of a visual anomaly on the northern side of Bellegrove Road. Located at the junction with Deepdene Road, it is currently used for office purposes with a large storage yard to the rear.



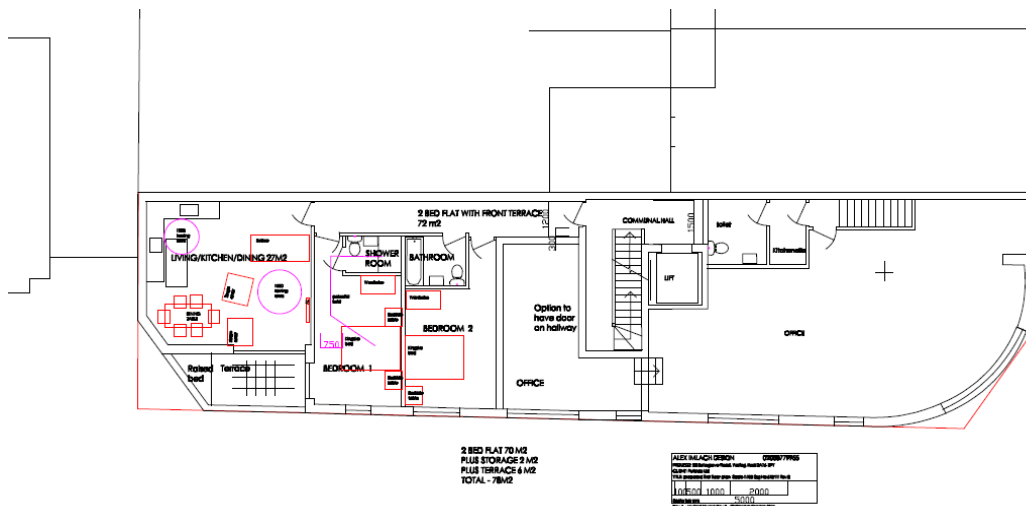
- 2.2. The Design and Access Statement prepared by ON Architecture contains a detailed analysis of the site and surrounding area, including a series of contextual photographs. It is clear that the site is located within an established retail/commercial parade with several examples of residential upper parts nearby.
- 2.3. With a PTAL rating of 4 the site is a recognised sustainable location, well-connected for local shops and other services. Welling Rail Station is located approximately 600m to the north-west of the site, whilst Bellegrove Road itself benefits from several local bus services connecting the site to the wider area.
- 2.4. The site contains no Listed buildings, is not within a defined Conservation Area and contains no existing trees. The Environment Agency's Flood Map for Planning locates the site within Flood Zone 1 meaning that it has a low probability of flooding.

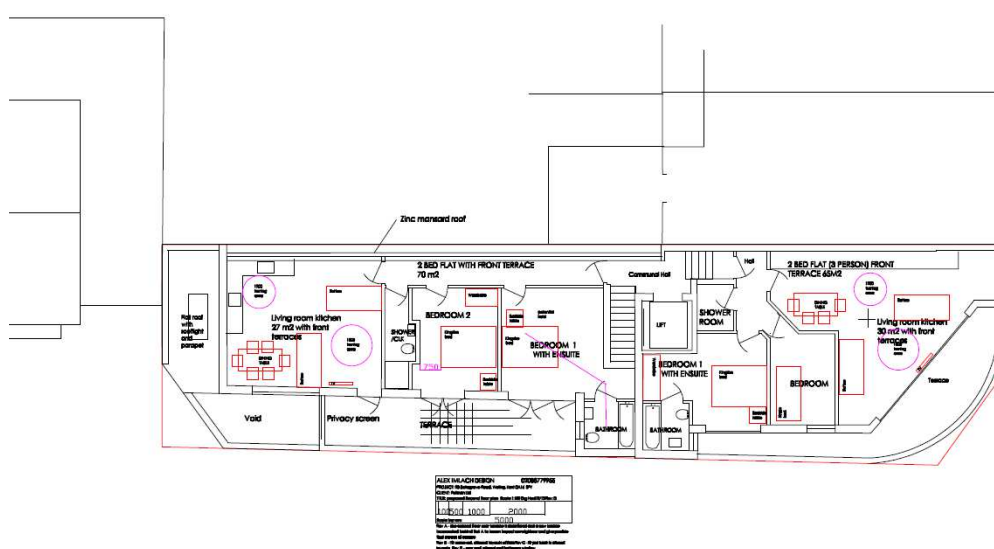
### 3. RELEVANT PLANNING HISTORY

3.1. Planning permission was granted in 2017 under reference 16/02191/FUL for the demolition of the existing building and the erection of a three storey building comprising a basement store, undercroft parking for four cars and office provision on the ground floor. The scheme included 3 x two-bedroom flats on the first and second floors along with the associated bin and cycle areas. This permission lapsed in March 2020 and was not implemented.

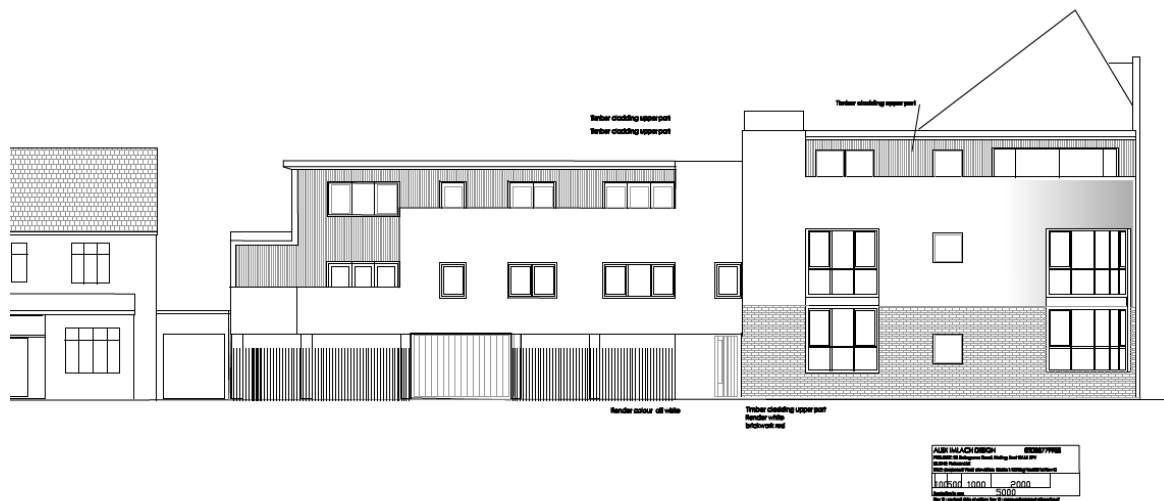


*Previously approved ground floor (above) and first floor (below)*





Previously approved second floor (above) and side elevation towards Deepdene Road (below)



3.2. It is clear, however, from the planning history that the general principle of a redevelopment of the site for mixed use residential and commercial purposes has significant policy support. This support has been strengthened further given the recent adoption of the updated 2021 London Plan which seeks to optimise site capacity and make the best use of land, delivering higher density developments in locations that are well-connected to jobs, services, local infrastructure and amenities including public transport services.

**Pre-application discussions with the Council**

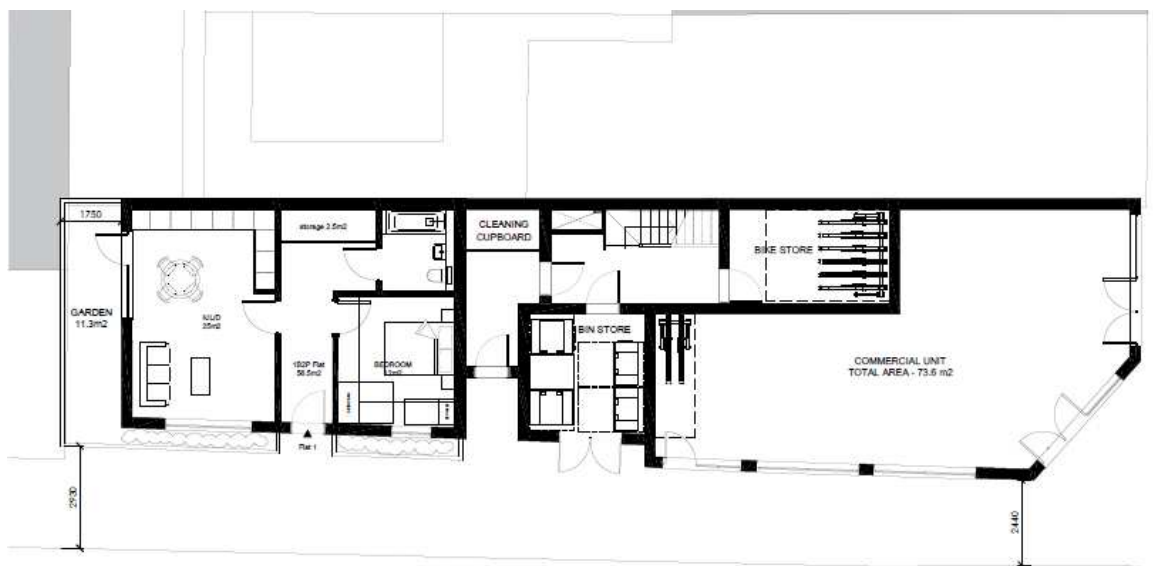
- 3.3. The applicants, in accordance with the guidance in paragraph 39 of the NPPF, sought to engage with the Council on a pre-application basis to discuss the relevant issues concerning a proposed redevelopment of the site. This sought to evolve a scheme that delivers the best possible outcome for the area whilst maximising the site's potential to deliver a mixed-use scheme.
- 3.4. Under the Council's reference 20/02908/PREAPP, a proposal for the construction of a four-storey block providing 10 residential units was the subject of discussion with the Council's principal planning officer. It must be said that the written response received in January 2021 did not wholly reflect the discussions which took place at the pre-application meeting. However, the Council's response did establish some key considerations.
- 3.5. Firstly, the response recognised that the site is located in a Major District Centre where Policy CS07 of the Core Strategy seeks to focus housing and employment growth '*in and around Welling Town Centre*'. The initial pre-application scheme sought a wholly residential redevelopment of the site; this was not initially supported, and it was suggested that robust justification would be required for the loss of the existing office space.
- 3.6. The discussions which in fact took place at pre-application stage were around the appropriateness of the existing use of the site (currently by a building contractor including the storage of trucks, vans, skips, etc) in effectively a town centre location. While the provisions of the Permitted Development legislation in relation to commercial to residential changes of use are a consideration, the applicants acknowledged the Council's preference to see a mixed-use scheme and the retention of some commercial space at ground floor level. Accordingly, the scheme has been revised to respond to this request.
- 3.7. It is a material consideration that the earlier approval utilised the entire ground floor footprint and approved development taking the building hard up to the site boundaries. Whilst some concerns were raised with the previous pre-application proposal, the Council's suggestion that '*the development approved under 16/02191/FUL is the limit of acceptability for scale and mass on this site, anything beyond this is considered to be overdevelopment*' is perhaps questionable given the shift in adopted policy and the

increased focus on the delivery of new development in sustainable areas. Again, the scheme has been amended to address the Council's concerns over '*scale and mass*'.

- 3.8. Somewhat unusually, the pre-application response sought to give no advice in relation to the quality of residential accommodation being provided, amenity space, impact on neighbours, residential amenity, refuse or highway matters. This is disappointing seeing as the discussion at the pre-application meeting acknowledged the Council's concerns over scale and mass and focussed on a reduced scheme including retained commercial space and addressing some of the Council's design concerns.
- 3.9. Again, for context, the Design and Access Statement contains a comparative analysis between the scheme discussed at pre-application stage versus the 2017 approval and this revised proposal. The overall amount of built volume has been reduced, likewise the proposed height, the number of residential units and some significant alterations made to the design approach discussed at pre-applications stage.
- 3.10. It is clear that the context of the site is such that there is significant adopted policy support for a redevelopment and for the construction of a larger building in place of the existing built form on site. The surrounding context, the Council's comments at pre-application stage and the principles of the 2017 approval has informed this development proposal.

#### 4. THE APPLICATION PROPOSAL

- 4.1. A full set of planning drawings has been prepared by ON Architecture which details the existing set up and the proposed redevelopment.
- 4.2. In accordance with Council's preference to retain an element of commercial space on site, the scheme now proposes the development of all existing built form on site and the construction of a mixed-use building containing a flexible commercial/Class E space to the front, with the remainder of the ground floor occupied by the necessary bin store, cycle store and a generous one-bedroom apartment towards 2 Deepdene Road.
- 4.3. The current building has a floor area of around 71m<sup>2</sup> and is in use in connection with the current owners building contractors business. The replacement commercial area will in fact be larger, at 73.6m<sup>2</sup>, with a flexible 'Class E' usage being far more appropriate for the location.

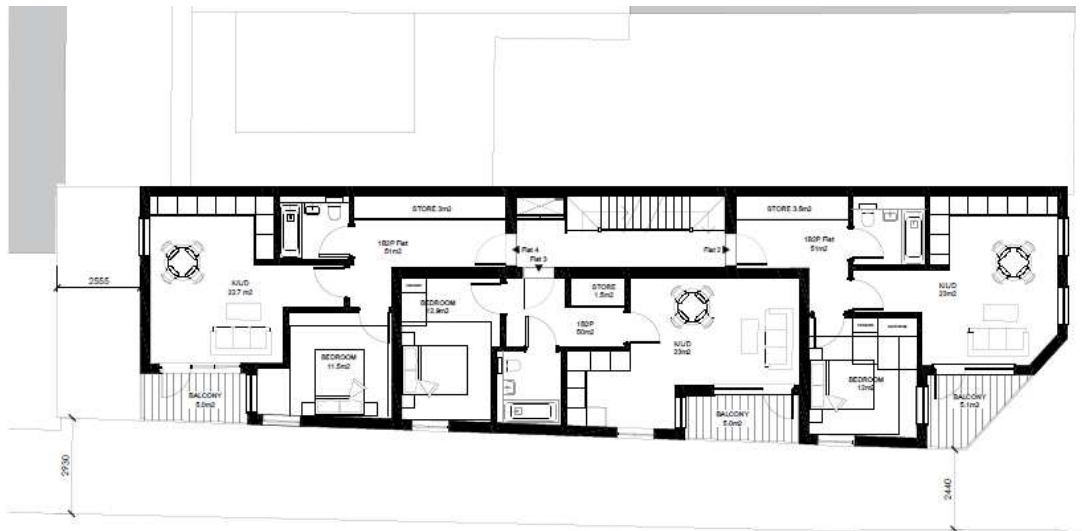


*Proposed ground floor*

- 4.4. Flat 1, on the ground floor, will have direct access to a generous outside amenity area accessed via the main kitchen/living/dining space.



- 4.5. At first floor level, Flats 2, 3 and 4 will also be generously sized one-bedroom flats which exceed the minimum space requirements of the National Prescribed Space Standards. Each unit has access to a dedicated, private amenity space which accords with the London Plan requirements for such areas.



*Proposed first floor*

- 4.6. The second floor will be recessed back from the northern boundary towards 2 Deepdene Road by 6.7m and will contain Flat 5 and Flat 6 which are two bedroom/three person flats with gross internal areas of 65m<sup>2</sup> and 61.8m<sup>2</sup> respectively. Again, both units have access to a generous private balcony area on the western elevation.



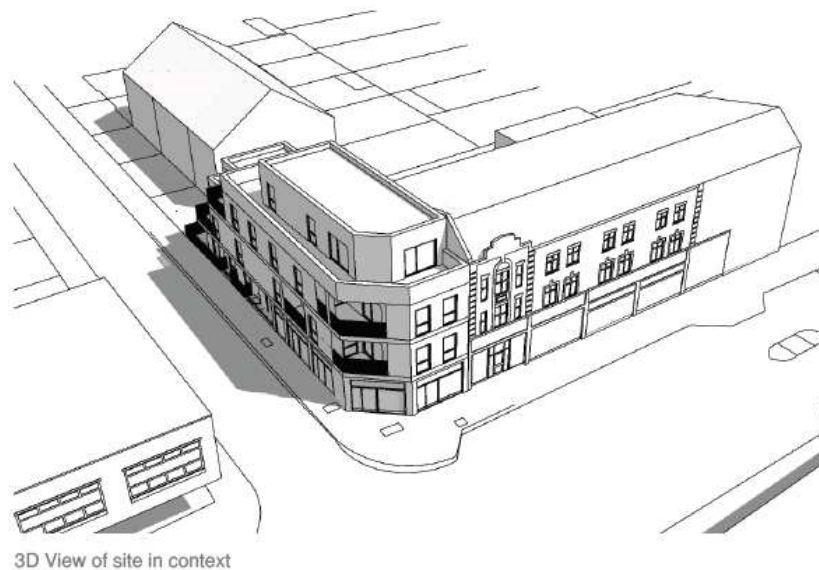
*Proposed second floor*

- 4.7. In response to the Council’s concerns during pre-application discussions, the proposed third/top floor has been recessed back from the front side and rear of the second floor footprint, increasing the gap towards Deepdene Road to 13.7m. The top floor contains the largest of the two-bedroom flats, a 71<sup>m2</sup> two bedroom/four-person unit with an extremely good sized balcony area which wraps around two sides of the building.



*Proposed top floor*

- 4.8. All proposed units will have a logical internal layout, each exceeding the minimum requirements of the Nationally Prescribed Space Standards, and all units benefitting from dedicated amenity areas in accordance with London Plan requirements.



- 4.9. The scale of the building has been informed by the previous approval on site and has been reduced since pre-application discussions took place in 2020. The existing building represents a significant anomaly in the street scene and this scheme seeks to propose a high quality landmark building which relates far better to the immediately adjoining properties than the existing development.
- 4.10. In terms of external materials, as set out within the Design and Access Statement, a mixture of red and grey brickwork along with recessed brick details, grey cladding and aluminium windows will be utilised to complement surrounding buildings.



- 4.11. The scheme retains an appropriate element of commercial/retail space at ground level fronting Bellegrove Road but removes the existing somewhat conflicting use given the prevailing residential characteristics along Deepdene Road. The currently unrestricted use of the site for vehicle movements and other commercial activity will be replaced with an appropriate mixed-use scheme which sits comfortably within the context of the site.
- 4.12. Most units will be dual aspect with all flats enjoying good levels of natural daylight and sunlight and a high standard of residential accommodation for future occupiers.

- 4.13. Suitable provision has been made at ground floor level for policy compliant levels of cycle storage and refuse areas; from a car parking perspective the proposal is for the scheme to be car free, and a full Transport Statement has been provided as part of this submission.

## 5. RELEVANT PLANNING POLICY CONSIDERATIONS

5.1. It is relevant to note the updates to the NPPF and London Plan which took effect since the submission of the pre-application enquiry. The relevant policy considerations are set out below.

### *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. Achieving sustainable development means that the planning system has three overarching objectives, which are inter-dependent and need to be pursued in mutually supportive ways;

- **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support the growth, innovation and improved productivity; and by identifying and co-ordinating the provision of infrastructure;
- **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and culture well-being;
- **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.4. Section 4 deals with decision making and states the local planning authorities should approach decision on proposed development in a positive and creative way. Decision makers are urged to approve applications for sustainable development where possible.
- 5.5. Paragraph 39 encourages early engagement through pre-application discussions in order to improve efficiency and the effectiveness of the planning application system for all parties.
- 5.6. Section 5 of the revised Framework sets out the government's objective of significantly boosting the supply of homes and delivering a sufficient supply of new houses that meet specific needs.
- 5.7. Paragraph 60 confirms that, to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
- 5.8. Paragraph 74 requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer of 20% where there has been significant under delivery of housing over the previous three years.
- 5.9. Paragraph 86 advises that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
- 5.10. Paragraph 71 refers to windfall sites and states that plans should consider the case for setting out policies to resist inappropriate development, for example on residential gardens, but only where development would cause harm to the local area. The Government also recognises that small and medium-sized sites make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

- 5.11. In relation to highway, parking and sustainable transport matters, paragraph 111 of the revised NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe.
- 5.12. Section 11 requires local planning authorities to ensure that planning policies and decisions promote an effective use of land in meeting the need for homes and other uses.
- 5.13. Paragraph 119 advises that planning policies and decisions should promote an effective use of land in meeting the need for homes. As much use as possible should be made of previously developed or brownfield land.
- 5.14. Paragraph 120 states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and also to promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained. Paragraph 120(e) states that opportunities to use the airspace above existing residential and commercial premises to provide new homes should be supported. In particular, planning policies are urged to support well designed upward extensions.
- 5.15. Paragraph 122 states that planning decisions should support development that makes efficient use of land.
- 5.16. 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.
- 5.17. 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.

### ***PLANNING PRACTICE GUIDANCE (PPG) (2014)***

What we consider to be the relevant parts of the PPG are set out below.

#### ***Design***

- 5.18. Achieving good design is about creating places, buildings or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development.
- 5.19. Planning policies should look to create streets that support the character and use of the area. Plans, policies and decisions can effectively manage physical form at a variety of scales. This is how planning can help achieve good design and connected objectives. Where appropriate the following should be considered:

*Layout – the way in which buildings and spaces relate to each other.*

*Form – the shape of buildings.*

*Scale – the size of buildings.*

*Detailing – the important smaller elements of buildings and spaces.*

*Materials – what a building is made from*

### **THE DEVELOPMENT PLAN**

#### ***The London Plan (2021)***

- 5.20. 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.



- 5.21. Policy D3 'Optimising Capacity through the Design Led Approach' encourages the best use of land in order to optimise the capacity of sites, particularly where sites are well located and in sustainable locations. Higher densities are encouraged to be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 5.22. 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.
- 5.23. 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.
- 5.24. 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)***

- 5.25. 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.

- 5.26. Policy CS07 relates to the Welling region, and seeks to focus housing delivery towards the town centre where higher densities are appropriate. The policy states that housing growth will be focused primarily in and around Welling Town Centre. Specifically, the policy encourages the provision of high quality, well designed mixed-use development proposals in the Town Centre that will contribute to its renewal and result in the retail and service function of the Town Centre being safeguarded. Such development should be sympathetic to local character.
- 5.27. Policy CS14 is concerned with the continued vitality and viability of existing town centres. The policy recognises town centres as appropriate for residential and mixed-use development. The policy indicates that the Council will maintain and enhance the vitality and viability of existing Town Centres by promoting a diversification in the mix of town centre uses including retail, community and residential uses.
- 5.28. Policy CS16 seeks to reduce the need to travel by promoting development in sustainable locations, such as town centres.

***Saved Policies of the Unitary Development Plan (2004)***

- 5.29. 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.
- 5.30. Policy SHO(WEL)1 relates specifically to Welling Town Centre. Policy SHO5 indicates that the Council will resist changes of use at ground floor level where such uses would harm the character, viability and vitality of the centre.
- 5.31. Policy H3 sets out that new residential proposals in primarily residential areas should have regard to the following criteria: the layout, scale and massing, elevational treatment and materials should be compatible with local character; spaces around buildings should

be compatible with the locality; the preservation of the historic environment would be sought; residential development will not be permitted in areas that are subject to excessive noise.

- 5.32. 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).
- 5.33. Policy H7 seeks to ensure a reasonable degree of privacy and outlook for space within and outside dwellings.
- 5.34. 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.
- 5.35. Policy ENV39 relates to the built environment, and states that the Council will seek to ensure that all new developments are satisfactorily located and are of a high standard of design and layout. The policy states that planning applications will be considered against six criteria, these are as follows –
- 1. The development is compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development;*

2. *Is appropriate landscaped, including the retention of appropriate trees and shrubs and the incorporation of public art where relevant.*
  3. *Has any unreasonable effect on the surrounding area by reason of noise and any emissions to land, air or water, and is not, by reason of its location, itself adversely effected by such conditions as may already be in existence within the neighbourhood.*
  4. *Makes adequate provision for vehicle parking in accordance with the Council's vehicle parking standards.*
  5. *Takes due account of the need to deter crime, both against individuals and against public or private property whilst maintaining an attractive environment; and*
  6. *Takes into consideration important local and strategic views, particularly where the proposed development is one which significantly exceeds the height of its surroundings or is located on a prominent skyline ridge.*
- 5.36. 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. Applicants will be required to justify the level of parking provision proposed.

#### **OTHER MATERIAL CONSIDERATIONS**

##### ***National Design Guide (2019)***

- 5.37. 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.
- 5.38. 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'.

- 5.39. Paragraph 58 of the Guidance states that where the scale or density of new development is 'very different to the existing place' it may be appropriate to create a new identity rather than to scale up the character of an existing place in its context.
- 5.40. 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.

***The Mayor's Housing Supplementary Planning Guidance (2012)***

- 5.41. The Mayor's Housing Supplementary Planning Guidance provides guidance on how to implement the housing policies in the London Plan. It is informed by the NPPF and the Government's Housing Strategy for England and sets out the minimum space standards for new residential development in London. The guidance includes:
- Standard 1 - demonstrating how design responds to its physical context including the character of the area.
  - Standard 9 - communal entrance lobbies should be visible and clearly identifiable and accessible from the public realm.
  - Standard 10 - active frontages should be maximised.
  - Standard 11 - 90% of new housing should meet Building Regulation requirement M4 (2) with the remaining 10% meeting M4 (3) – Wheelchair user dwellings
  - Standard 20 - all development should provide dedicated cycle storage space.
  - Standard 24 - all new dwellings should meet the national space standards.
  - Standard 26 - 5m<sup>2</sup> of private outdoor space should be provided for 1 – 2 person dwellings and an extra 1 m<sup>2</sup> for each additional occupant.
  - Standard 29 - development should minimise the number of single aspect dwellings.

- Standard 32 - all homes should provide for direct sunlight to enter at least one habitable room for part of the day.

***Design and Development Control Guidelines***

- 5.42. 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 proposal is to demolish the existing buildings on site and to construct a replacement mixed use development containing commercial space at ground floor with 7 residential units. The retention (and enhancement) of the commercial/retail floor area at ground level responds to the Council's comments at pre-application stage, and each proposed residential unit will be of a high standard providing compliant levels of amenity space, cycle parking and refuse storage areas.

6.2. It is common ground with the local authority that the site is located in a sustainable town centre location. The strategic guidance within the NPPF and the London Plan strongly promote the most efficient use of previously developed land in such locations, and strongly encourages applicants to optimise the delivery of new residential accommodation.

### *The principle of the development*

6.3. In terms of the general principle of the development, therefore, there is no conflict with the Council's adopted policies or with the strategic guidance at a regional and national level. The scheme will provide an appropriate flexible commercial unit (to be within Use Class E) ensuing that an active retail and commercial use is maintained to enhance and complement the existing parade along Bellegrove Road. This, again, is in the line with the Council's preferences.

6.4. Housing is a key priority use across London, particularly in sustainable locations with a high PTAL rating. In this case, the PTAL rating of 4 and the town centre location is such that the introduction of residential development on site as part of a mixed-use redevelopment wholly accords with the requirements of Policy CS07 of the Bexley Core Strategy.

6.5. The particular wording of paragraph 120 of the NPPF actively promotes upwards extensions and increased height in appropriate locations. Furthermore, the Government's recent focus on promoting upward extensions to existing buildings through Permitted Development are also a significant material consideration. The resulting building is at a

lower height than discussed at pre-application stage and will be of an appropriate scale and height for its context. It will sit comfortably within the street scene, representing a vast visual improvement over the existing development.

- 6.6. The 2017 approval for an (in our view) inefficient redevelopment of the site of a poorer overall quality, is a material consideration in the determination of this submission. In our assessment the scheme optimises the delivery of a high quality mixed use scheme, delivering residential units of an appropriate mix for the location, alongside a redevelopment of a higher quality design and visual standard than which currently exists. Overall, therefore, at a principle level the scheme is considered to be wholly policy compliant.

*The proposed residential accommodation*

- 6.7. All units meet or exceed the floor area requirements of the Nationally Prescribed Space Standards, each provided with London Plan compliant (or higher) areas of amenity space. This accords entirely with Policy D6 of the London Plan as well as the objectives of Saved UDP Policies H3, H6 and H7.
- 6.8. The design and layout of the proposed residential units will be commensurate with local character and will provide future occupants with the high standard of accommodation which is sought by Policy ENV39 of the Saved UDP.
- 6.9. All units will have a good standard of outlook which is commensurate with the context of the immediate surroundings, and each unit will be well served by natural daylight and sunlight. The design approach adopted by the architects allows the delivery of generous amenity areas which adds to the visual quality of the building whilst also providing a high standard of residential accommodation.

*The effect on the character of the area and the immediate street scene*

- 6.10. Concerns were raised at pre-application stage that a block of the scale and massing previously proposed represented an overdevelopment of the site. It was suggested that the scale and mass of the building be reduced to address this concern.



- 6.11. As set out in within the Design and Access Statement, the design of the scheme has evolved following discussions with the Council at an early stage. The overall height, footprint and massing of the building responding to both the material considerations of the previous approval on site and striking an appropriate balance between making the most efficient use of the land whilst respecting local characteristics. This is a balance which, in our firm view, has been appropriately struck.
- 6.12. The plans prepared by the architects demonstrate that the design approach adopted has had due regard for the immediately adjoining buildings along Bellegrove Road, whilst also ensuring that existing levels of residential amenity along Deepdene Road and at surrounding residential properties has been respected. The stepped nature of the building looks to aggregate the main bulk of the building towards Bellegrove Road and the commercial/retailing character of that area, whilst stepping down towards the two storey characteristics along Deepdene Road itself.
- 6.13. Again, it is our view that an appropriate design approach has been adopted which has due regard for the strong focus within the NPPF for high quality design whilst acknowledging the guidance within the National Design Guide. This seeks to promote innovation whilst maximising the delivery of new housing and mixed-use development.
- 6.14. As a result of the changes made since pre-application stage, our firm view is that there will be no negative effect on the wider character of the area arising from this proposal. Indeed, the street scene will be significantly enhanced with the introduction of a high-quality landmark building of this type. This accords entirely with the objectives of Policy ENV39 of the Saved Unitary Development Plan.
- 6.15. The plans include details of an appropriate palette of materials which will add a high degree of visual interest to the site without appearing out of character or out of scale with surrounding buildings. The composition of the different elements of the proposed building have been designed to provide a piece of architecture which will significantly enhance the overall character and appearance of the immediate area. This accords entirely with section 12 of the NPPF.

*Any effect on nearby residential amenities*

- 6.16. No concerns were raised by the Council at pre-application stage in relation to any effect on the nearest residential amenities. It was considered that the overall scale of the previously proposed building should be reduced to ensure that the building responds to the prevailing characteristics nearby whilst acknowledging that the urban/town centre location is such that a degree of indivisibility between properties is entirely reasonable and fully expected in such locations.
- 6.17. The 2017 approval continued to utilise the area nearest 2 Deepdene Road for commercial parking, generating vehicle movements directly adjoining the boundary with the nearest residential property. This scheme introduces a more complimentary residential use in this area, while also increasing the separation to the shared boundary over the previously approved redevelopment.
- 6.18. It is a material consideration that current use of the site operates on an unrestricted basis for storage purposes and vehicle movements associated with the existing use. This scheme removes this potential for conflict, and as such represents an improvement in terms of the general amenities of No.2 Deepdene Road.
- 6.19. The positioning of the proposed balcony areas responds to existing relationships, particularly towards No. 2 Deepdene Road which has no flank windows which will be impeded in terms of their access to daylight or from any overlooking or loss of privacy point of view.
- 6.20. The outlook from all proposed units will be mainly towards Bellegrove Road/Deepdene Road rather than towards the garden areas of surrounding properties. The building will be staggered in such a way that it remains well separated with the boundary with No. 2 Deepdene Road, where due regard must be had for the 2017 approval where development over two storeys was permitted closer to that boundary.
- 6.21. As stated, the general visual amenities of the street scene will be greatly enhanced by the development. It is not anticipated that, given the context of the site, there will be any overlooking or loss of privacy experienced by neighbouring occupiers. This accords

entirely with the objectives of policies H7 & H9 of the saved UDP as well as the requirements of Policy ENV39.

*Car parking & highway Implications*

- 6.22. As stated, the proposal will be car free given the town centre characteristics of the site. The PTAL rating of 4 is such that, reduced or zero carparking provision is supported at a regional level within the London Plan, and it is noted that the Councils adopted parking policies have now been largely replaced by the requirements of the London Plan itself.
- 6.23. In order to fully assess the potential implications of a car free development, specialist Highways Consultants Pulsar Transport Planning have been appointed to prepare a full Transport Statement. This statement accompanies this application.
- 6.24. The full findings of the Transport Statement need not be repeated here, however, the evidence concludes that zero on-site parking provision accords with the London Plan and reflects the sustainability credentials of the location. Policy compliant levels of cycle parking are provided, alongside suitable secure space for the storage of refuse bins.
- 6.25. On the basis of the evidence provided it is apparent that a car free scheme is entirely appropriate in this instance. The NPPF is clear that development proposals should only be resisted on transport/highway ground where any impact would be “severe”. On the basis that the proposal is in full accordance with the objectives of the replacement 2021 London Plan, and in light of the accessibility of other modes of transport nearby, there would not appear to be any justified traffic or transport objections to this proposal.

*Other Considerations*

- 6.26. From a Flood Risk and Drainage perspective, the application is in flood zone 1 and is therefore not at risk of flooding. There are no issues in relation to trees as the site currently contains no vegetation and there can be no reasonable concerns from any biodiversity viewpoints given the context of the site.

## 7. **CONCLUSION**

- 7.1. The site comprises previously developed land within the urban area and is in a highly sustainable and accessible location. National, regional and local planning policies within the NPPF, the London Plan and the Council's Development Plan fully support making the most effective use of such land.
- 7.2. Specifically, Core Strategy Policy CS07 seeks to focus housing delivery towards the town centre whilst safeguarding any commercial elements which will assist the overall function of the Welling geographic region.
- 7.3. The retention and upgrading of a flexible commercial unit at ground level is such that there is no overall net loss of employment floor space on site (in fact an enhancement in the amount of space will occur), and the existing somewhat conflicting or less appropriate commercial use of the site will be replaced with an active retail/commercial frontage which accords with the Council's objectives.
- 7.4. The delivery of 7 high quality new homes will assist the Council in delivering the national priority of 'boosting significantly' the supply of housing. The building will be of a high quality of design both internally and externally, improving the appearance of the street scene and utilising a suitable pallet of materials. This is in complete accordance with the objectives of Policy H3 & Policy H6 of the Saved UDP.
- 7.5. The replacement building will be a vast visual improvement over the existing setup, responding to the recent focus within the updated NPPF to create better places in which to live and work whilst reflecting and enhancing local character.
- 7.6. All residential units proposed fully accord with the minimum space requirements, offering generous internal areas and logical internal layouts. The provision of dedicated amenity space in a town centre location is a significant benefit and reflects the high standard of design being proposed.

- 7.7. Nearby residential amenities have been respected, with the scheme responding to the context of the site. Given the lack of any harmful effects on existing residential amenities nearby, the scheme does not conflict with the Council's objectives within the saved UDP.
- 7.8. A car free development is supported at a regional policy level, and appropriate levels of cycle parking and refuse storage facilities are provided in line with the requirements of the relevant policies of the London Plan. This also complies with the Council's overall objectives with regard to car parking and highway implications.
- 7.9. Overall, therefore, and particularly in light of the national focus for increased densities and increase height in sustainable town centre locations, there are clear and significant benefits to be associated with this proposal.
- 7.10. The scheme will be in accordance with the policies of the development plan as a whole and there are no other material considerations that would weigh against the scheme in the overall planning balance. Accordingly, it is respectfully suggested that planning permission should reasonably be granted for this development, subject to any necessary planning conditions.