

Planning Statement

Planning policy framework

This section of the Planning, Design and Access Statement examines the national and local planning policy context in relation to the application site and the proposed development.

Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. The adopted development plan for Bexley includes the Bexley Core Strategy 2012 (**CS**), the saved policies of the Unitary Development Plan 2004 (**UPD**), and the London Plan adopted in March 2021 (**LP**).

Bexley has a number of adopted supplementary planning policy documents. Bexley's Design and Development Control Guidelines (**DDCG**) and the Bexley **Design for Living SPD** 2006 are considered to be a material planning consideration for this proposal. The National Planning Policy Framework 2021 (**NPPF**) is also a material planning consideration.

Between May and July 2021 Bexley ran a public consultation on the Regulation 19 version of the Draft Local Plan (**DLP**). Following a review of the representations submitted during the consultation, the Council will prepare the documents for submission to the Secretary of State for Housing, Communities and Local Government for public examination. The latest version of the Local Development Scheme states that the Council is expecting to adopt the new Local Plan in the third quarter of 2022. Currently, the emerging policies of the DLP carry little weight in the determination of planning applications.

Below is a summary of the relevant planning policy considerations that should be taken into account in assessing the proposed development. Under each group of policies is a comment demonstrating that the proposal would comply with them.

Planning policy assessment

Principle of development - Provision of new housing on a small site

Paragraph 69 of the NPPF acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and are built-out relatively quickly. Paragraph 69 also encourages local planning authorities to support the development of windfall sites through their policies and decisions. giving great weight to the benefits of using suitable sites within existing settlements for homes.

Policy GG2C of the London Plan states that to create successful sustainable mixed-use places that make the best use of land decision-makers should *"proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling"*.

Paragraph 1.4.5 of the London Plan reads as follows:

“To meet the growing need, London must seek to deliver new homes through a wide range of development options. Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow. Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market.”

Policy H1 of the LP aims at increasing housing supply across London. It sets specific ten-year housing targets for each borough. It reinforces the priority of optimising the potential for housing delivery on “*all suitable and available brownfield sites*” through allocations in development plans and through planning decisions. It also underlines that one of the best “sources of capacity” for this increase are small sites.

Policy H2 of the London Plan 2021 is devoted specifically to small sites (below 0.25 hectares in size).

Paragraph 4.2.1 of the LP states that “*increasing the rate of housing delivery from small sites is a strategic priority*”. The policy itself requires boroughs to “*proactively support well-designed new homes on small sites*”, “*significantly increase the contribution of small sites to meeting London’s housing needs*” and “*support small and medium-sized housebuilders*”.

Paragraph 4.2.2 of the LP notes that one of the wider planning policy objectives related to the goal of increasing output in small sites is to increase “*housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets*”.

For Bexley, Table 4.2 of the LP sets a ten-years target of 3,050 new net housing completions on small sites.

Policy CS01 of Bexley’s Core Strategy focuses on achieving sustainable development and requires development 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.

Policy CS10 of the Core Strategy focuses on housing need, with table 4.1 confirming there is a significant demand for new three-bedroom dwellings available on the open market.

Assessment

The proposal is a sustainable residential development that can be built relatively quickly and efficiently for the benefit of a family. It will contribute to address Bexley’s pressing housing needs and will increase housing provision on a site close to the shops of Marechal Niel Parade. This intensification of the existing residential use will accord with Policy GG2C of the London Plan 2021.

The site is a suitable and available “small site” which is located at a walking distance of just 200 metres from a local shopping parade and the bus stops of Main Road. The proposal will optimize the potential for housing delivery in compliance with Policies H1 (B) 2a and H1 (B) 2e. of the new London Plan.

The proposal will contribute to the strategic priority of significantly increasing the delivery of new units on small sites to meet London's housing needs, as required by Policy H2 of the London Plan 2021 and the targets set out in Table 4.2 of the London Plan.

The addition of a family unit on this small site will also align with the objectives of Policy CS01 of Bexley's Core Strategy, which seeks to optimise housing delivery through an efficient use of land. Furthermore, the proposal for a three-bedroom unit will comply with the localised objectives of providing a high proportion of new houses for larger households in Sidcup which is set out in Policy CS10 of the Core Strategy.

From a quantitative point of view, the addition of one family unit to the Council's housing stock will be in full accordance with the strategic housing delivery targets set out in the London Plan 2021 and the local targets indicated in the current and emerging development plans.

In summary, the principle of replacing an ancillary garage with a new dwelling with the same footprint and design of the existing unit at 110 Longlands Park Crescent would be a balanced form of intensification which will make the best use of the plot and increase family housing, in accordance with planning policies at all levels.

Design

The NPPF and the London Plan stress the importance of achieving high quality design in all developments, the more so when heritage assets might be affected.

Policy D3 of the London Plan 2021 states that *“development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity”*.

In relation to form and layout, Policy D3 of the London Plan states that 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”*.

Policy CS6 of the Core Strategy relates to the Sidcup geographic region, where the application site is located. It seeks to ensure that the areas that are characterised by mainly semi-detached and detached family housing are retained and, where possible, improved, including the surrounding environment, and that new development is in keeping with the character of these areas.

Saved Policy H3 of the Bexley's UDP sets out the parameters that should be met when proposing new residential developments in primarily residential areas. It states that development should be compatible with the character or appearance of the area in which it is located, and the following criteria should all be satisfied:

- 1. the layout, scale and massing, elevational treatment, and materials of building should be compatible with the local character or appearance;*

2. *the spaces around buildings (including roads) and their hard and soft landscaping and plot separations should be compatible with the local character or appearance and fulfil clear and useful functions;*
3. *the development should pay special regard to the setting of any listed buildings or the character and appearance of a Conservation Area where appropriate; and*
4. *where appropriate, landscape and nature conservation features of interest, such as trees, hedgerows and ponds, should be preserved.*

Residential development will not normally be permitted in locations which are, or are expected to become, subject to excessive noise.

The actual or potential cumulative effects of a development should be given sufficient weight in applying this policy.

Saved Policy H8 of Bexley's UDP focuses on infill development and states that new residential development consisting of dwellings to the side or rear of existing properties will be permitted where they have adequate and safe access for vehicles, where the proposed dwellings are adequately separated from other properties, where there is no adverse effect on the character of the area and where important landscape and nature conservation features of interest are preserved.

Assessment

The project architect has put the analysis of the context and the assessment of constraints at the centre of the process that informed the proposed massing and design. In this instance, the proposed shape and volume of the house has been the result of the study of local housing typologies, the topography of the site and the assessment of views and building alignments in the surrounding areas.

Longlands Park Crescent is characterised by a mix of detached, semi-detached and terraced houses that follow the curved shape of the road. The alignment of dwellings is more pronounced along the street frontage, with the rear elevations including extensions of different heights and depths. The new dwelling will effectively transform a semi-detached pair into a small three-units terrace, but this change will be consistent with the variety of housing typologies of Longlands Park Crescent, and will be absorbed by the wider urban pattern without affecting the character of the neighbourhood. This will be in accordance with Policy D3 of the London Plan, which advocates full integration of new buildings with the local urban form, and with Policy CS6 of the Core Strategy, which requires the preservation of the suburban character of Sidcup.

As shown in the submission drawings, the new volume will sit well in the plot and will fit seamlessly in the local context, as the proposal would be comparable to the height of buildings in the immediate context and other buildings within the surrounding area. There will be a minor increase of residential density, but not to the detriment of the character of the local townscape. No important gaps in the urban fabric will be closed and there will be no terracing effect thanks to the visual break given by Braemar Gardens. This will comply with the requirements of Saved Policy H3 of Bexley's UDP.

The development has been oriented in a way that protects the amenity of neighbouring occupiers and will provide a very high standard of amenity for future residents, with generous internal spaces, private amenity space, double frontages, and high levels of liveability of the interiors.

The new house will not protrude beyond the front and rear building lines of the existing house at No.110 at ground level, and will be located at an appropriate distance from neighbouring windows. The proposal will include a spacious front driveway and a dedicated rear garden of a size comparable to that of surrounding houses, with new planting and improved soft landscaping provided for both 110 Longland Park Crescent and the new building. Adequate visual separation from the adjoining properties will be retained.

The proposal also includes improved soft landscaping for 110 Longlands Park Crescent in the form of planters located along the southern boundary of the retained house.

The proposed materials, fenestration and finishings will match those of 110 Longlands Park Crescent and will blend with the Tudor revival architectural language of the street. This choice of a traditional material treatment will further ensure that the new building becomes a balanced and unobtrusive addition in the streetscene.

For the reasons set out above, the new house will maximise the efficient use of land whilst also preserving the amenity of adjoining occupiers and the visual amenity of the street, in full accordance with Saved Policy H8 of Bexley's UDP.

We therefore submit that the proposed massing and design of the new house will be in full accordance with the requirements of the London Plan and the local plan's policies relating to urban design, massing, architecture and visual amenity.

Housing quality

Policy D6 of the London Plan sets out detailed guidance and requirements for the delivery of high quality new residential accommodation. Among the topics covered by this policy are the size of new residential units and the size of bedrooms, the provision of double aspect units, the daylight and sunlight levels of new residential accommodation and the size of private outdoor amenity space.

Saved Policy H6 of the UDP relates to provision of 'adequate' usable amenity space provision on site, which can include gardens, balconies, terraces and roof gardens.

Assessment

With an internal area of 90 sqm, the new house will exceed the internal space standards set out in the London Plan for two-storey, three-bedroom four persons houses. The two single bedrooms and the double bedroom will meet the recommended size for single and double bedrooms. The internal layout of the house is legible and functional and will provide good levels of domestic comfort. The new building will have a double aspect and excellent levels of natural light and ventilation.

Both the retained house at 100 Longland Park Crescent and the new house will have private rear gardens of a size comparable to those of surrounding houses. The front courtyard will accommodate one dedicated car parking for each house and refuse bins, which could be easily accessed by refuse collection vehicles from the front.

Residential amenity

Policy D3 of the London Plan 2021 states that all developments should deliver appropriate outlook, privacy and amenity. Policy D3 also states that new developments should deliver appropriate outlook, privacy and amenity and help prevent or mitigate the impacts of noise and poor air quality.

Saved Policy H7 of the UDP states that residential development should provide a reasonable degree of privacy and outlook for space within and outside dwellings.

The Bexley Design for Living SPD 2006 requires for dwellings to be orientated to minimise overshadowing and also seeks for new development to be of an appropriate density. The SPD notes that amenity space needs to be integral to any design and incorporated within all proposals. The SPD also outlines the importance of ensuring the privacy and amenities of residents within new developments are adequately preserved.

Assessment

The new house will have the same footprint, height and massing of the retained house at 110 Longlands Park Crescent. Thanks to the alignment of the front and rear building lines of the adjoining units, it is not expected that the new building will have negative impacts on the amenity of the adjoining occupiers by way of overshadowing and overbearing effects or loss of privacy.

The only minor difference between the new house and the retained unit at No.110 would be the small rear return protruding from the first floor of the proposed dwelling. This volume, however, will only be 1.5 metres deep and will not clash with the 45 degrees sight line taken from the nearest first floor window of 110 Longland Park Crescent.

The new structure will be located well away from the other properties of Longlands Park Crescent and Braemar Gardens, so the adjoining occupiers will not suffer from negative amenity impacts due to overbearing or overshadowing effects.

The increase in the use of the front courtyard and of the new rear private garden will be commensurate to a standard residential use within an established residential neighbourhood. The vehicular and pedestrian traffic generated by the new house will be absorbed by the local highway network with no negative impact on surrounding residents through noise or traffic.

We therefore submit that the proposed development will not have any negative impact on the residential amenity of the surrounding properties, and that it should be supported on this basis.

Transport, parking and accessibility

Policy T1 of the London Plan 2021 states that all developments should make the most of effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impact on London's transport networks and supporting infrastructure are mitigated.

Policy T5 of the London Plan states that developments need to include appropriate levels of cycle parking which should be fit for purpose, secure and well-located. For residential developments in Use Class C3, the standard is 1 cycle space per studios or one person, one-bedroom dwellings, 1.5 cycle spaces per two person, one-bedroom dwellings, and 2 cycle spaces per all other dwellings.

Saved Policy T17 of Bexley's UDP states that *"in the case of smaller developments, the applicant may be required to demonstrate how the travel needs arising from the development will be met in circumstances where there are concerns about the impact of on-street parking on amenity and traffic flow"* and that *"parking spaces should be located so as to discourage on-street parking and respect the amenity of near-by residents"*.

Assessment

A dedicated car parking space will be provided for the new three bedroom dwelling and for 110 Longlands Park Crescent itself. This will be commensurate with the wider surroundings and ensures that there will be no negative effect on the conditions of highway safety or levels of parking stress on the surrounding streets.

The application is supported by a Parking Stress Survey prepared by Alpha Parking which demonstrates that the surrounding street network has capacity to absorb any minor overspill of car parking resulting from the addition of one new house on the site. A comparable amount of overnight capacity was considered acceptable by the Council in the approved application for a new house at 2 Newbery Road (Ref. 20/03109/FUL).

The proposed refuse storage will be located at the front to facilitate access by local refuse collection operators.

Conclusions

The proposed development will optimise the use of the plot with the net addition of one family house and will contribute to the delivery of much needed housing on a small site.

The massing, shape and design of the building has been chosen after a detailed analysis of the context and an assessment of challenges and opportunities given by the orientation of the plot and the local pattern of development. The proposal will blend seamlessly with the local townscape through the use of a traditional design and matching materials. There will be an intensification of residential use, but the increase will be proportionate to the context.

The proposal will not have any impact on the residential amenity of adjoining properties or the visual amenity of the neighbourhood.

The proposed level of on-site car parking, combined with the availability of car parking in the surrounding streets, will ensure that the movement and parking needs generated by the new house will be absorbed by the local highway network without negative impacts on traffic and amenity.

For these reasons, it is submitted that the proposal will comply in full with the Council's local plan policies and we would respectfully suggest that planning permission should be granted for the erection of a new house to the side of 110 Longlands Park Crescent, subject to any appropriate and proportionate planning conditions.