



Planning Statement

Alterations and extensions to existing building to provide 16 apartments comprising 7 x 1 bed, 8 x 2 bed and 1 x 3 bed units with associated parking and amenity space.

106 Bexley Road,
Erith,
Kent,
DA8 3SP

September 2021

Document Reference: 2966
London Borough of Bexley

Executive summary

1. This application follows the previous approval on site for the alterations and extensions of the existing dwelling to provide 13 flatted units (LPA ref: 19/02740/FULM). This application seeks to provide a minor rear extension to the permitted scheme to allow for an uplift in units to provide an additional 3 flats, providing a scheme for 16 units in total.
2. The principle of development is established and the application has demonstrated that the scheme can meet all the technical requirements and standards to provide a high quality housing scheme, in a sustainable location.

Introduction

3. This Planning statement has been prepared by Plainview Planning Ltd on behalf of Mr Kang (the 'Appellant') in support of a planning application for residential development on land at 106 Bexley Road, Erith, Kent, DA8 3SP. The proposed development comprises alterations and extensions to an existing building to provide 16 flats with associated parking and amenity space.
4. This Planning Statement demonstrates how the proposed scheme responds to the planning requirements set by the Bexley Core Strategy (2012), Saved Unitary Development Plan Policies (2004), London Plan (2021), the National Planning Policy Framework (2021) and any supplementary planning documents.
5. The application is accompanied by the following plans and documents:
 - Application Form and CIL forms
 - Planning Statement Prepared by Plainview Planning
 - Full set of Planning Drawings Prepared by Urban and Rural
 - Design and Access Statement Prepared by Urban and Rural
 - Viability Report Prepared by S106 Affordable Housing
 - Parking Report Prepared by Motion
 - Noise Report Prepared by Anglia Consultants
 - Heritage Statement Prepared by Heritage Advisory
 - Fire Safety Statement Prepared by QFSM Ltd
 - Arboricultural Report and Tree Protection Plan Prepared by Arborsense
 - Bat Roost Potential Building Assessment Report and Supporting Letter Prepared by Hone Ecology

Site Context

Site Location

6. The application site extends to 0.16ha and is located on the northern side of Bexley Road, Erith.
7. The site is approximately rectangle in nature and comprises a part 2 part 3 storey detached residential dwelling house with associated hardstanding for parking purposes to the front and garden area to the rear. It also has a usable basement level.
8. Land levels fall away steeply to the rear of the site.
9. To the north of the site is an area of woodland with Birch House Business Centre beyond. To the east and west are further residential properties which front onto Bexley Road, the west is characterised by a row of semi-detached bungalows and the east has more detached and semi-detached two storey properties. To the south is the A220 Bexley Road with further residential development beyond also a mix of detached and semi-detached two storey properties. The site therefore sits within a primarily residential area within Erith, an area identified for sustainable growth.

Accessibility

10. The site has a very poor PTAL of 1b however, Erith Town Centre is just 0.6 of a mile, approximately a 15-minute walk from the proposed development site. It hosts a wealth of services and facilities.
11. Erith Train Station is located within the town centre and offers frequent services (4 per hour) to London Cannon Street, London Charing Cross (2 per hour) and Dartford (2 per hour).
12. 106 Bexley Road is located opposite the Lesney Park bus stop, which provides services into the town centre and train station, providing good connections to both regional and national rail networks. In the opposing direction there are also services to the local hospital.
13. There is a nearby public path (Birch Path) running from Kempton Close to Fraser Road, creating links to the trading centre and the north of Erith.

Landscape and Historic Designations

14. The site is not within a conservation area, nor does it have the protection of being a Grade I or II listed asset. The building has recently (6th February 2018) been locally listed. The significance of the structure is principally found to reside with its 'local historical significance, primarily the historical association with Samuel Strickland, a Victorian merchant who played a significant role in the economic life of the area' (Report to Councillor Linda Bailey, Cabinet Member for Regeneration and Growth – 2 February 2018 re: Local List Addition – Hastings Villa). A full heritage assessment has been produced to inform the proposal.
15. The site does not have any landscape designations and relates to a previously developed site made up of brownfield land.
16. The site borders the former BxB104 Erith Quarry and Fraser Road SINC on its northern garden boundary. The remainder of the SINC comprises a mature Sycamore tree line with Ivy and Bramble scrub dominant. A bat survey of the SINC conducted in 2014 found bat presence to be low, with Common Pipistrelle being the dominant species recorded.
17. The environment agency's flood risk map indicates that the proposal site lies in flood zone 1 (no risk).

Planning History

18. The planning history most relevant to the application is set out below.
19. **02/05781/OUT.** Outline application for the erection of 3 detached 2 storey blocks consisting of 6 x 2 bedroom flats with associated parking. Application Refused 23rd May 2003.
20. Summary of refusal reasons;
 - Proposed layout of the three blocks would have an adverse impact on the residential character of the area and amenity for neighbouring occupiers;
 - Insufficient information submitted regarding land levels, stability of the escarpment and arboricultural matters
 - Insufficient provision of car parking spaces.
21. **08/13836/FULM.** Demolition of existing property and erection of a three storey building to provide 17 flats, comprising 8 x 1 bedroom, 7 x 2 bedroom and 2 x 3 bedroom with 17 car parking spaces and amenity space. Application refused 11th June 2010.

22. Summary of refusal reasons;

- Unacceptable density, mass of building, fenestration details all provide poor internal environment for some rooms within the scheme;
- Design and materials fails to respect local character of the area and street scene;
- Size and materials of the proposed bin store adversely impact the street scene.

23. This proposal was taken to appeal and subsequently dismissed on 6th May 2011 (Appeal reference: **APP/D5120/A/10/2141190**) due to adverse impacts on the character and appearance of the area due to its size and massing. The reasons for refusal relating to design, materials and the bin store were not seen as sufficient on their own to withhold planning permission. In terms of density, the Inspector noted that in line with Bexley's Design for Living SPD (which remains adopted) *"In all cases, density will be considered on the basis of site characteristics, quality of design, and meeting the principles outlined in this document."* (see page 14 of the document) and density was not seen to be a valid refusal reason in isolation.

24. **17/02255/FULM**. Demolition of existing property and erection of a part two/part three storey building to provide 5 x 1 bed, 7 x 2 bed and 2 x 3 bed apartments with associated parking and amenity areas. Application refused 8th March 2018.

25. Summary of refusal reasons;

- Proposal will result in the demolition of a locally listed heritage asset;
- Proposed scale, massing and density would result in overdevelopment of the site out of keeping with the local character of the area;
- Proposal is considered to provide a poor standard of accommodation by virtue of including undersized single aspect north facing units.

26. This application was also appealed and subsequently refused on 14th March 2019 (Appeal reference number: **APP/D5120/W/18/3210250**). The reasons for refusal were with regard to the loss of a local heritage asset, and the replacement massing of the proposal having an adverse impact on the area's character and appearance. The floorspace shortfall was seen to be slight and inconsequential and the proposal would provide satisfactory living conditions for its future occupants. The appeal also noted that the proposal would make efficient use of the site by creating 14 new apartments, a modest benefit in favour of the scheme.

27. **18/01564/FULM**. Alterations and extensions to existing building to provide 13 apartments comprising 4 x 1 bed and 9 x 2 bed units with associated parking and

amenity space. (amended description). 106 Bexley Road Erith Kent DA8 3SP. Application refused 6th June 2019.

28. Summary of refusal reason - failure to provide or make any provision towards affordable housing. Again this application was subsequently appealed and refused on 24th September 2019 (Appeal reference: **APP/D5120/W/19/323052**). The appeal solely focused on the provision or otherwise of affordable housing. Local policy requires a scheme of 10 or more units to provide 35% affordable housing and where full provision cannot be demonstrated viability evidence is required.
29. Viability evidence was provided along with a UU which allowed for an early stage and late stage review of implementation of the development, if viability improved such that affordable housing could be provided, in the form of a financial contribution towards off-site provision.
30. This UU was not signed or executed so issues over enforceability were raised. Furthermore, it was not considered appropriate by the Inspector given that it did not include allowances for on site affordable housing provision or a robust justification for such off site only provision.
31. Following this, a further application 19/02740/FULM was submitted which included Heads of Terms relating to affordable housing to ensure an appropriate mechanism is in place. The application was approved at the Planning Committee in June 2020, with the decision notice issued on 8th December 2020, following lengthy discussions over the S106 agreement.
32. Overall, the planning history has allowed for several iterations of the site's re-development to ensure a robust policy compliant scheme has now come forward. This application seeks to marginally change this to provide an additional 3 housing units, the design development is set out in further detail in the accompanying Design and Access Statement.

The Proposal

Layout and Scale

33. The proposal results in alterations and extensions to the existing building to move from a single dwelling to 16 new apartments. The proposed unit mix is 7 x 1 bed and 8 x 2 bed and 1 x 3 bed units - an added benefit of the scheme which is now providing a greater housing mix and family sized unit.

34. A basement level will be provided containing five units, with an excavated area around the perimeter of the building to provide light and outlook for these units. The ground floor comprises a total of five apartments. The first floor comprises four apartments and the top floor two apartments.
35. The site can easily accommodate the proposed amount of apartments in line with the required technical standards. The current proposal includes a minor rear extension to the approved scheme under (LPA ref: 19/02740/FULM) to provide 18% of additional floor space to include an additional 3 flats, in the least conspicuous area of the site, which assists in retaining the existing frontage and streetview, in line with the designation of the site as a Local Heritage Asset. It is providing an opportunity to make the efficient use of the site to provide 16 flats.
36. The proposal has been driven by the existing building on site in terms of scale, siting and design. The additional built form will concentrate the existing and proposed into one area of the site. The existing building height has increased by two additional floors to the rear but due to the topography of the site, this sits below the existing established roofline and will not be visible from the frontage of the site.
37. Most of the external walls and chimneys of the existing building will be retained, including the front elevation which will remain visible to preserve the historic value of the site. The side walls and part of the rear wall will also be retained but will largely be internalised by the new extensions. Some internal doorways will be inserted into these existing walls and part of the rear wall will be removed to create a staircase.

Appearance and Detail

38. The existing building fabric and materials provide an important reference point to ensure that there will be limited visual change from the street scene.
39. The proposed extension to the existing building will retain the previous detailing and style of architecture of the existing. It has been designed to match and blend in with the existing. The existing property looks somewhat run down and the proposed scheme, if approved, will provide detailed refreshment and restoration to the existing façade, with a well-detailed, high quality build to the proposed.
40. The applicant is happy to agree a condition for which detailed materials will be submitted for approval to the Local Planning Authority following any approval.

Amenity Space

41. 51% of the site will remain as amenity space without built form and/or parking. This is set out in further detail on the accompanying Amenity Space Plan (B1353-150 Rev P4).

Landscaping, Trees and Ecology

42. There is limited landscaping proposed as part of the scheme, with no evidence of change in appearance of the site from a broader context. The front of the site has a garden wall and this is proposed to be re-built as part of the application ensuring the quality of the site on the public realm. Within the landscaped areas of the site, small permeable hardstanding areas have been introduced to provide spaces in which people can go and sit, eat or just be outside.
43. There will be no removal or alteration to the main arboricultural features of the site, only 3 trees in already poor condition are to be removed and the proposed scheme would not have a significant adverse impact on the arboricultural character and appearance of the local landscape - see accompanying Arboricultural Report and Tree Protection Plan submitted with the application for more information.
44. In terms of ecology, there was no evidence of protected species on the site. The site layout and boundary treatments are not considered to cause any adverse impacts on the adjacent SINC. See accompanying Bat Roosting Potential and Building Assessment Report submitted with the application.
45. Looking at biodiversity enhancement and net gains, supplemental native hedgerow planting and the provision of bat and bird boxes is proposed as per the previously submitted ecologist's letter from 26th February 2019 which was submitted under the now approved 13 units scheme (LPA ref: 19/02740/FULM) for which the conclusions remain valid.

Access and Parking

46. The existing access situation will remain unchanged, with the site entrances being taken directly off Bexley Road.
47. The existing parking area is at the front of the site behind the existing boundary wall that will be retained and extended. The proposal will result in 12 off-street car parking spaces including two dedicated electric car charging points (approx. 20% of overall provision) and one accessible parking space. The predicted car parking demand for the proposed 16 no. flats scheme is 10 cars and this will be contained within the proposed 12 off-street car parking spaces. Please see the accompanying Parking Report submitted with the application for further information.
48. A dedicated covered cycle store will be provided within the site boundary accommodating up to 20 cycles.

Sustainability

49. Sustainability is an important consideration of the proposal. The development has undertaken a fabric first approach to the development to optimise the performance of the components and materials of the building fabric, resulting in improved energy efficiency and a reduction in carbon emissions. Such measures include; maximising air tightness and using high insulation. Measures such as the inclusion of low energy bulbs and movement detecting lighting, SuDs, A-rated boiler and eco labelled white goods have also been included.

Draft Heads of Terms

50. In order to address and agree issues that would need to be covered by planning obligations at an early stage, the applicant has submitted Draft Heads of Terms as part of this planning statement.

51. These set out clearly the obligations that the applicant is willing to be bound by, in order to meet the needs generated by the development that are not going to be met as part of the development scheme itself. The Draft Heads of Terms include the agreed timing/triggers for satisfying the obligations. In this instance these primarily relate to the provision of affordable housing.

52. The draft heads of terms set out below are intended to provide a basis for negotiations and a finalisation of appropriate obligations.

Affordable Housing

- Following the outcome of the viability assessment, no affordable housing will be provided up front as part of the proposal
- An early stage review (which would provide onsite affordable housing if triggered) would be included within any legal agreement along with a late stage review and a carbon off-set payment
- The design and specification of any Affordable Housing is to be similar to that of the housing for private sale.

Planning Policy

53. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, this Statement will appraise the saved policies contained within the Development Plan for the area and will address all other material considerations relevant to the

development proposed, including emerging local policy, the National Planning Policy Framework (NPPF) (2019) and Planning Practice Guidance (PPG).

Development Plan

54. The relevant policies against which to assess this proposal are contained in the Development Plan, which in this instance comprises the Bexley Core Strategy (2012), the saved policies of the Unitary Development Plan (2007) and any supplementary planning documents.
55. The proposal is also in compliance with the London Plan 2021, where relevant.
56. Bexley are currently preparing a New Local Plan to guide development to ,this is currently at regulation 19 stage which is pre-submission and it therefore holds no weight on the determination of this application.

Relevant Policies

London Plan (2021)

- Policy H.1 – Increasing housing supply
- Policy H.2 - Small Sites
- Policy D3 – Optimising site capacity through the design led approach
- Policy D6 – Housing Quality and Standards
- Policy SI.13– Sustainable drainage
- Policy SI.2 - Minimising Greenhouse Gas Emissions
- Policy T.5– Cycling
- Policy T.6.1 - Residential Parking
- Policy D.4 – Architecture
- Policy D.12 - Fire Safety
- Policy HC.1– Heritage Conservation and Growth
- Policy G.6– Biodiversity and access to nature

Bexley Core Strategy (2012)

- CS01 – Achieving sustainable development
- CS04 – Erith geographic region
- CS09 – Using Bexley's resources sustainably
- CS10 – Housing need
- CS18 – Biodiversity and geology
- CS19 – Heritage and archaeology

Unitary Development Plan (2004) (saved policies)

- ENV35 – Trees and hedges - planting, protection and retention

- ENV39 – Built Environment
- H3 – Character of local residential areas - criteria to ensure compatibility
- H6 – Residential development - amenity space
- H7 – Residential development - privacy and outlook
- T17 – Parking - off-street parking spaces

Other Material Considerations

National Planning Policy Framework (2021)

57. In July 2021 the Government published the revised NPPF. This continues to retain a presumption in favour of development and a pro-growth attitude. The key purpose of the NPPF is to achieve sustainable development which is defined by three overarching objectives: economic, social and environmental (paragraph 8). These three objectives are mutually dependent and are explored in more detail in the material considerations section of this document.

58. Relevant chapters include:

- Chapter 5: Delivering a sufficient supply of new homes
- Chapter 9: Promoting sustainable transport
- Chapter 11: Making effective use of land
- Chapter 12: Achieving well designed new places
- Chapter 16: Conserving and Enhancing the Historic Environment
- In addition to the aforementioned NPPF and PPG, there are several other material considerations relevant to the determination of this application. They are outlined below.

Supplementary Planning Documents

- Affordable Housing (2006)
- Design For Living (Bexleys Residential Design Guide) (2006)
- Sustainable Design and Construction Guide (2007)
- Mayor of London's Affordable Housing and Viability SPG (2017)
- Mayor of London's Housing SPG (2016)
- Mayor of London's Sustainable Design and Construction SPG (2014).
- Bexley's Growth Strategy (2017)

Planning Considerations

59. This section provides an assessment of the following matters.

- Principle of Development

- Affordable Housing and Viability
- Design Character and Appearance
- Impact on Residential Amenity
- Transport and Access
- Ecology, arboriculture and biodiversity
- Planning Balance

Principle of Development

60. The proposal is for extensions and alterations to the existing building on site to provide 16 new apartments. Residential use is already established on the site by virtue of the existing dwelling and previous permission for 13 units (LPA ref: 19/02740/FULM) and the proposal is simply intensifying this use.
61. The site itself sits within Erith which is identified as a sustainable location for growth within the adopted Core Strategy. The surrounding area is also inherently residential so the proposal will assimilate well with this compatible land use.
62. **Policy CS01** of the Bexley Core Strategy (Achieving Sustainable Development) notes the importance of retrofitting existing housing stock where possible and maximising the efficient use of resources, whilst providing a mix of type and tenure of housing to meet new housing needs. The proposal by way of its alterations and extensions to an existing building results in a conversion to maximise the unit numbers on site and accords with this policy and **policy CS09** (Using Bexley's Resources Sustainably). The site is also sustainably located and seeks to reflect and enhance the local character of the area.
63. **Policy CS04** relates specifically to the Erith Geographical Region and seeks to ensure contributions are made to future housing growth in the area along with improving the quality of the built environment through new high quality residential development. The location, type of housing and proposed design accords with this policy.
64. **Policy CS10** (Housing Need) identifies a requirement for increasing housing supply. In regards to London Plan **Policy H1** (Increasing Housing Supply), London Plan Table 4.1 sets Bexley's 10 year housing target at 6850 dwellings, 685 units per year from 2018/2019 to 2028/2029. The proposal would make a useful contribution to housing supply in the Borough.
65. The proposal also accords with **policy H2** (Small Sites) of the London Plan which supports the development of small scale (below 0.25ha) sites such as this, in line with **paragraph 69** of the NPPF. Both of which recognise the importance of a prompt build out of such sites and the important contributions they make towards the supply of housing.

66. The principle of development has been firmly established by reason of the sites location, aforementioned planning history and compliance with adopted policies **CS01, CS04, CS09, CS10**, policy **H1** and **H2** of the London Plan and **paragraphs 60, 69 and 119** of the NPPF which seek to boost the provision of housing and make the most efficient use of land.

Affordable Housing and viability

67. **Policy CS10** of the adopted Core Strategy requires sites of 10 units or more to provide 35% affordable housing, unless a viability appraisal is submitted and accepted looking into the financial capability of the scheme.

68. The proposal exceeds this affordability threshold, given the provision of 16 units however, a full viability appraisal has been submitted to accompany this application. Draft Heads of Terms have been included within this statement to ensure that within any S106, both early and late stage review mechanisms will be secured to ensure that a contribution towards affordable housing will be secured in the event that the scheme transpires to be more profitable than envisaged.

69. This position differs from the previous draft legal agreements included within the dismissed appeal scheme as there was no provision for on site affordable housing rather the focus was on triggering off site contributions for which there was no justification given the LPA's preference is for on site provision unless there are exceptional circumstances.

70. On this basis, the proposal complies with adopted **policy CS10** and the Mayor of London Affordable Housing and Viability SPD (2017) which require the provision of detailed viability evidence to be scrutinised by the LPA to justify any departure from affordable housing provision.

Design, Character and Appearance

71. The NPPF recognises at **paragraph 126** that *"good design is a key aspect of sustainable development"*. The proposal seeks to ensure the development is of a high quality design which assimilates with the surrounding built form but also creates its own sense of place. The design elements of the scheme are set out in the accompanying Design and Access Statement submitted as part of this application.

72. The existing property is a locally listed building. **Policy CS19** states that locally listed buildings are heritage assets. The building therefore enjoys the protections afforded by local, London-wide, and national policy and guidance regarding heritage assets.

73. The policy aim is to conserve or enhance the significance of the locally listed building and its setting, and to protect the locally listed building from development that is likely

to adversely impact on the significance, integrity, character or appearance of the building or its setting.

74. Previous applications on the site were refused due to the heritage impacts resulting from proposed demolition on site. The current proposal seeks to retain the existing building and preserve its historic integrity and key features, namely the principle elevation and the building's shell, which are to be supplemented by the new build extensions and alterations. The rear extension elements assist in providing an increased density of development on the site without causing any adverse impacts on the Locally Listed Heritage Asset. This position has been supported by a supplementary Heritage Statement which accompanies the application. It concludes that;

"..current proposals have sought to ensure that changes in the perception of the site and its built form (particularly following the completion of the already approved scheme) would be negligible, particularly given the proposed implementation of a highly referential and ultimately subservient rear addition.

5.9 With respect to relevant guidance contained within the NPPF (paragraph 190), proposals have therefore taken account of the desirability of sustaining and enhancing the significance of the heritage asset, as has the potential for putting the existing structure to viable use, consistent with its conservation (paragraph 197)."

75. This is coupled with the public benefits which arise as a result of the enhancement of the site and provision of housing offset any minimum level of harm identified as part of the proposal. It therefore accords with **paragraphs 199, 203** of the NPPF along with adopted **policy CS19** and **policy HC1** of the London Plan.
76. London Plan **Policy D3** seeks to optimise the potential of sites via a design led approach. Having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. Such increases in density are supported in such sustainable locations as the site.
77. The proposal is to provide 16 residential units on a 0.16 hectare site, which provides a density of approximately 100 units per hectare, which is considered acceptable for the site and location of the site.
78. The proposal is not considered to cause any adverse harm to the character and appearance of the area and complies with **policy D3** of the London Plan which seeks to ensure regard has been had to the existing urban grain, is informed by the surrounding historic environment and is of an appropriate scale, orientation and mass. It also complies with **chapter 12** of the NPPF requiring good design, a key principle of sustainable development.

Residential Amenity

79. The siting of the proposal is driven by the existing building on site, with the additional extensions it remains 7.85m from the closest point of the adjacent property to the east, 12.55m to the west, 45m to the south - beyond Bexley Road. There are no residential properties to the rear of the site to the north. These distances are deemed to be sufficient enough as to not warrant any significant overshadowing or impact on outlook.
80. Fenestration detailing has been carefully considered to supplement this through the use of obscure glazing, roof lights and carefully positioned angles where necessary.
81. Road traffic noise from Bexley Road is the primary source of noise affecting the site. The accompanying noise report demonstrates that acceptable internal noise levels for future residents can be achieved if enhanced acoustic glazing is provided to habitable rooms on sensitive facades. Acoustically treated trickle vents (or equivalent wall vents) will also need to be incorporated into the glazing units in order that their acoustic performance is not compromised
82. The ample separation distances, fenestration detailing and design considerations have resulted in a proposal which will not cause any adverse impact on neighbouring residential amenity in terms of outlook, daylight, sunlight or privacy. The proposal therefore complies with saved **policy ENV39 and policy H7** from the Unitary Development Plan, and Bexleys Design for Living SPD.
83. In terms of living conditions for future occupiers, all the proposed units meet or exceed the National Space Standards for floorspace, bedroom size etc. 81% of the units are dual aspect with the remaining 3 units (1, 6 and 11 as previously approved) being broadly south facing with bay windows which have wider aspect and outlook than standard windows. The proposal also accords with the minimum separation distances set out in Bexleys Design for Living SPD.
84. Furthermore, the proposal exceeds the requirement for 45% of the site area as amenity space to be provided in accordance with Bexleys Design for Living SPD with regards to flatted development. 51% of the site area is for amenity space. It is also in accordance with the saved **policy H6** of the UDP and **policy D6** of the London Plan which requires that 5m² of private outdoor space is required for 1-2 person dwellings, and an extra 1m² should be provided for each additional occupant with a minimum depth of 1.5m.
85. Overall, the future occupiers will have more than satisfactory living conditions.

Access and Parking

86. It is proposed that vehicles will enter the site via the existing vehicle access at the southwestern end of the site frontage and exit via the existing access at the north-easter side of the frontage. This arrangement would ease access and egress to the parking area and signs are to be included to reinforce the entrance and exit points.
87. Given the scale of the proposal, it is unlikely to have a significant impact on the local highway network and therefore accords with **paragraph 111** of the NPPF.
88. A total of 12 off street car parking spaces would be provided inclusive of 2 EVC spaces and 1 accessible space. The proposal also includes a dedicated cycle store to provide 20 cycle parking spaces. This is in accordance with the parking standards set out in **policies T5 and T.6.1** of the London Plan and **policy T17** of the UDP.

Ecology, arboriculture and biodiversity

89. There is limited landscaping proposed as part of the scheme, with no evidence of change in appearance of the site from a broader context. The front of the site has a garden wall and this is proposed to be re-built as part of the application ensuring the quality of the site on the public realm. Within the landscaped areas of the site, small permeable hardstanding areas have been introduced to provide spaces in which people can go and sit, eat or just be outside. SuDS is proposed and details of which will be secured via condition at a later date.
90. There will be no removal or alteration to the main arboricultural features of the site, only 3 trees in already poor condition are to be removed and the proposed scheme would not have a significant adverse impact on the arboricultural character and appearance of the local landscape. A monitoring and maintenance regime will be implemented to ensure that the retained trees remain in good health and that any future problems can be detected and remedial actions taken. The proposal therefore accords with **policy ENV35** of the saved UDP.
91. In terms of ecology, there was no evidence for bats externally or internally in the top floor roof area. There was also no evidence of nesting birds on site. The domesticated nature of the grounds means the habitats are sub optimal to host common bird or reptile species. This along with the fact the proposed development site is enclosed within a walled and fenced boundary and is elevated several metres above the SINC means it is not considered to cause any adverse impacts on the adjacent SINC.

92. Looking at biodiversity enhancement and net gains, supplemental native hedgerow planting and the provision of bat and bird boxes is proposed in accordance with **paragraph 170(d)** of the NPPF.

Planning Balance

93. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise. The NPPF is one such material consideration. The NPPF sets out at paragraph 11 that, decisions should apply a presumption in favour of sustainable development;

“c) approving development proposals that accord with an up-to-date development plan without delay”

94. The proposal is considered to accord with the general thrust of relevant local and national policies when taken as a whole. The objectives of these policies are to ensure new residential development is sustainably located whilst making efficient use of existing land and resources. The existing site and immediate surroundings are residential in character, this will not change as a result of the proposal but simply be intensified to make the most efficient use of the site and its existing built form.
95. In this instance the proposal is policy compliant and accords with both the relevant saved policies of the UDP and adopted Core Strategy. The new Local Plan is at such an early stage that it bears no weight on the determination of this application.
96. Notwithstanding the proposals consistency with the Development Plan, permission should still be granted given that there are no adverse impacts associated with the scheme but there are a number of social, economic and environmental benefits, some of which ought to be given significant weight, these are outlined below;
- The redevelopment of an existing brownfield site;
 - The provision of a high quality development which reflects the historic character of the site and retains the principle elevation and key building fabric;
 - The uplift in residential units on the site, improving the provision of housing in a sustainable location;
 - The high level of amenity space provision on the site, which exceeds policy requirements;
 - The provision of a mix of housing types to meet various housing needs for the area, including family housing, allowing upgrading or downsizing accordingly;
 - Direct job creation generated through the construction phase;
 - The increased footfall and consumer spend in the town centre from future occupants helping to boost vitality and viability of the area;

- There are no landscape or ecological constraints associated with the site and the proposal offers the opportunity for biodiversity net gain through habitat creation;
- There are no adverse amenity or traffic impacts associated with the site, it will assimilate well with the existing built form and residential character of the area without causing problems for existing and future residents.

97. Overall, given the policy compliance of the scheme, additional material considerations, along with the proposal's ability to achieve net gains across the social, economic and environmental considerations of sustainable development, it is respectfully requested that this proposal is approved.

Conclusion

98. In summary, planning permission is sought for:

"Alterations and extensions to existing building to provide 16 apartments comprising 7 x 1 bed, 8 x 2 bed and 1 x 3 bed units with associated parking and amenity space."

99. This Planning Statement considers all relevant adopted local policy and other guidance contained within the National Planning Policy Framework and Planning Practice Guidance, in addition to other material considerations.

100. It has been concluded that the proposal represents a sustainable form of development. Furthermore, the layout, landscaping and architectural approach have all been considered in the context of the site's opportunities and constraints, with particular regard to the historic value of the site. The proposal will provide a high quality design which will enhance the area in which it sits.

101. The application package as a whole robustly demonstrates that the proposal is consistent with the Development Plan when read as a whole and there are no material considerations that indicate otherwise. There are no adverse impacts of the proposal but there are significant benefits which are outlined above. It is therefore respectfully requested that the London Borough of Bexley support the proposal and grant full planning permission.