

Planning Department
Civic Offices
2 Watling Street
Bexleyheath
DA6 7AT

Ref: P_337/BS

17 December 2021

Dear Sir / Madam,

RE: 109-111 WELLING HIGH STREET, WELLING, DA16 1TY
RE: PRIOR NOTIFICATION - SUPPORTING PLANNING INFORMATION: TOWN & COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER (AS AMENDED) CLASS G: PART 3, SCHEDULE 2

This letter is submitted to the London Borough of Bexley (the "Council") on behalf of Rajen Kandel (the "Applicant / Developer"), in support of a proposed change the use of the first floor ancillary retail space to two flats (C3) (the "Proposal") at 109 – 111 Welling High Street, Welling, DA16 1TY (the "Site").

The application is submitted under Schedule 2, Part 3, Class G of the Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015 (as Amended) and seeks prior notification for development consisting of a change of use from a use within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order, to a mixed use for any purpose within that Class and as up to 2 flats.

The change of use from Class E to a mixed use and up to two flats is subject to the condition that before beginning the development, the developer shall apply to the Council for a determination as to whether the prior approval of the authority will be required as to:

- Contamination risks in relation to the building;
- Flooding risks in relation to the building;
- Impacts of noise from commercial premises on the intended occupiers of the development;
- The provision of adequate natural light in all habitable rooms of the dwellinghouses;
- Arrangements required for the storage and management of domestic waste

This letter should be read in conjunction with the following documents:

- Completed Application Forms prepared by CREATE Planning
- Completed CIL Form prepared by CREATE Planning
- Noise Assessment prepared by NRG Consulting
- Existing and Proposed Drawings prepared by CREATE Design Ltd:
 - Site Location Plan
 - DR-A-01-0100 – Existing Ground Floor plan
 - DR-A-01-0101– Existing First Floor Plan

- DR-A-01-0103 – Existing Roof Plan
- DR-A-05-0101 - Proposed Ground Floor Plan
- DR-A-05-0100 - Proposed First floor Plan
- DR-A-05-0101 – Proposed Roof Plan
- DR-A-01-0200 – Existing Front and Rear Elevations
- DR-A-01-0201 – Existing Side Elevations
- DR-A-05-0201 - Proposed Front and Rear Elevations
- DR-A-05-0200 - Proposed Side Elevation
- DR-A-05-0400 - Proposed Sections

The Applicant will pay the Application Fee.

In support of this application:

1. WRITTEN DESCRIPTION OF THE PROPOSED DEVELOPMENT

The application seeks the prior approval of the Council for development consisting of use of a building from a use within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order, to a mixed use for any purpose within that Class and as up to 2 flats.

2. DETAIL / PLAN OF SITE & DEVELOPMENT

i. Site Description and Location

The Site comprises a two storey mid terrace building with a deep part single, part first floor rear annexe in a parade of shops near the corner of Welling High Street and Upper Wickham Lane.

The building is occupied by a retail unit at ground floor (Boots) with ancillary accommodation on the first floor.

Site Location Plan



Site Photograph



ii. Context

Aerial Photograph of the Site



Transport & Accessibility

The Site's location in the High Street is accessible with close access to a number of public transport links including Welling Railway Station. The site has a PTAL rating of 4, considered to be 'very good'.

PTAL Rating



Street Map



Heritage Assets

The Site is not within a designated Conservation Area and there are no Listed Buildings in the Site's vicinity.

Environmental Settings

Contamination

There is nothing to suggest the Site or the surrounding sites are affected by ground contamination. The Proposal relates to flats on upper floor levels and thus won't be affected by ground conditions. No ground floor external amenity space or gardens are proposed.

The Local Planning Authority have the ability to request a desktop assessment and further investigative reports which can be secured through a planning condition.

Flood Risk

The Site does not lie within an area at risk of flooding (Flood Zone 1). The site does not lie in an area that is significantly affected by ground or surface water flood risk.

Noise

There are no immediate commercial uses surrounding the Site that would be deemed incompatible with residential use, with retail below the proposed flats. A noise assessment is submitted with this application.

Planning History

- Installation of security shutter to front.

109 - 111 Welling High Street Welling Kent DA16 1TY

Ref. No: 14/02173/FUL | Received: Thu 20 Nov 2014 | Validated: Thu 20 Nov 2014 | Status: Granted with Conditions

- Provision of one internally illuminated fascia sign and one internally illuminated projecting box sign.

109 - 111 Welling High Street Welling Kent DA16 1TY

Ref. No: 07/01459/ADV | Received: Wed 31 Jan 2007 | Validated: Mon 12 Feb 2007 | Status: Granted with Conditions

- Installation of automatic telling machine.

109-111 Welling High Street Welling Kent DA16 1TY

Ref. No: 98/01421/FUL | Received: Tue 30 Jun 1998 | Validated: Tue 28 Jul 1998 | Status: Granted with Conditions

- One non-illuminated projecting sign and one internally illuminated 'watch strap' sign.

109-111 Welling High Street Welling Kent DA16 1TY

Ref. No: 98/01421/ADV | Received: Tue 30 Jun 1998 | Validated: Tue 28 Jul 1998 | Status: Granted with Conditions

- One illuminated fascia sign one illuminated projecting sign

109-111 Welling High Street Welling Kent DA16 1TY

Ref. No: 89/02298/ADV | Received: Tue 19 Dec 1989 | Validated: Tue 19 Dec 1989 | Status: Granted with Conditions

Of particular note:

- Prior notification for the change of use of first floor from offices (Class B1(a)) to 1 x bed self contained flat (Class C3).

107 Welling High Street Welling Kent DA16 1TY

Ref. No: 18/03000/PRIOR | Received: Fri 23 Nov 2018 | Validated: Tue 04 Dec 2018 | Status: Approved.

5. PLANNING POLICY FRAMEWORK

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, when determining a planning application, regard is to be given to the Development Plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

- National Planning Policy Framework 2021
- The London Plan 2021

The Local Plan is a key part of Bexley's Development Plan. It includes:

- the Core Strategy
- current policies in the Unitary Development Plan (UDP)
- [technical documents](#)

Online Policies Map



The Site lies in a designated 'Core Shopping Frontage', within a 'Major District Centre'.

6. ASSESSMENT OF IMPACTS

The change of use from Class E to a mixed use and up to two flats is subject to the condition that before beginning the development, the developer shall apply to the Council for a determination as to whether the prior approval of the authority will be required as to:

- Contamination risks in relation to the building;
- Flooding risks in relation to the building;
- Impacts of noise from commercial premises on the intended occupiers of the development;
- The provision of adequate natural light in all habitable rooms of the dwellinghouses;
- Arrangements required for the storage and management of domestic waste

i. Contamination Risks

The Core Strategy states that the effects of land contamination will continue to be managed in line with Bexley's Contaminated Land Strategy. In addition, opportunities to improve the health of the environment through new developments will be supported.

Policy CS01 Achieving sustainable development, sets out that maximising the effective and efficient use of natural and physical resources, including land, water and energy, whilst addressing pollution issues, such as contamination, noise and air quality, to contribute to the health and well being of the community and the environment.

There will be no exposed sub soil in the proposed building use. Furthermore, there is no known contamination in the immediate vicinity of the building or the wider surroundings. The proposed change of use simply involves the use of the upper floor of the existing building on the site with some minor internal alterations.

The Site is in existing retail use. The building has been in use since its construction and there have been no issues concerning ground contamination.

There is no historic reference to contamination and current and past land uses (predominantly retail) do not indicate the likely contamination of the ground conditions.

In light of the above, the change use will have no impact in terms of contamination and the proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class G.

ii. Flooding Risks on the Site

The site is located in Flood Zone 1 as set out above and thus not at risk from any flood event.

Policy CS07 Welling geographic region states that the vision for the Welling geographic region will be achieved by ensuring that development in areas susceptible to localised flooding incorporates measures to manage surface water drainage;

The updated SFRA maps do not indicate that the Site is prone to other sources of flood risk.

In light of the above, the change use will have no impact in terms of flood risk, and the Proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class G.

iii. Impacts of Noise from Commercial Premises on the Intended Occupiers of the Development

Please refer to the supporting Noise Assessment prepared by NRG Consulting.

As part of the prior approval criteria, the Permitted Development Order requires an assessment of the impacts of noise from commercial premises on the intended occupiers of the development.

Policy CS01 Achieving sustainable development, sets out that maximising the effective and efficient use of natural and physical resources, including land, water and energy, whilst addressing pollution issues, such as contamination, noise and air quality, to contribute to the health and well being of the community and the environment.

The site is not within an environmentally sensitive area. In view of the nature of the surrounding uses and the mitigation set out in the noise assessment, it is not considered that there would be an adverse noise impacts from commercial premises on the intended occupiers of the development would be experienced.

In light of the above, the change use will have no impact in terms of noise, and the proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class G.

iv. The provision of adequate natural light in all habitable rooms of the dwellinghouse

One of the principles set out in the SPD: design for living Bexley's residential design guide set out that development should maximise light levels in dwellings through their orientation whilst respecting the privacy, amenity and outlook of existing buildings

The existing first floor comprises fenestration to the front, rear and sides of the building providing the existing first floor with light.

As shown in the proposed layout plans, the habitable rooms, comprising the living room, kitchen and bedrooms would benefit from adequate access to natural light, utilising the position of these windows. As demonstrated in the sections, there are no significant impediments to these windows and occupants would benefit from suitable levels of daylight.

In light of the above, the change use will provide adequate natural light to all habitable rooms and the proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class G.

v. Arrangements required for the storage and management of domestic waste

Please refer to the proposed first floor plans.

The SPD: design for living Bexley's residential design guide states that careful consideration should be given for access to waste disposal facilities for residents on upper floors in flatted development.

It goes onto state that waste containers should have designated external storage areas that are sensitively located and designed. These storage areas should be in a position that is mutually convenient and easily accessible for both the residents and the waste and recycling collection crews. Where there are separate storage areas for general refuse and recycling, the recycling store should be the easiest to access (e.g closest, least restricted access etc.).

Internal storage areas should be designed into each unit of a new development to allow occupants to segregate their waste into refuse and recyclables, and store it temporarily, until it can be transferred to external bins.

As there is no external area for the provision of refuse and recycling storage, separate waste storage is provided within each flat. An area within each flat would have a dedicated space for such storage and then taken to the refuse collection point on the day of the Council's refuse or recycling collection. This could be either on Welling High Street via the front entrance or on Upper Wickham Lane via the service alley and via the rear staircase.

Further details of such arrangements can be secured by means of planning conditions.

In light of the above, the change use will provide suitable arrangements for the storage of waste. and the proposal complies fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class G.

vi. Compliance with the National Described Space Standards

From 6th April 2021 applications submitted are required to adhere to the minimum space standards set out in the DCLG's Technical Housing Standards – Nationally Described Space Standards (March 2015).

All units will comply as set out on the submitted drawings.

6. CONCLUSIONS

For the reasons set out above, the proposed use of the first floor as residential retaining the ground for retail (Class E) will have no adverse impact in terms of, flood risk, noise, ground contamination or flooding and each habitable room would benefit from adequate access to light and storage facilities for domestic waste.

It is therefore demonstrated that the Proposal complies fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class G and constitutes permitted development.

I trust this letter is satisfactory for the registration and validation of the Application and I look forward to receiving an acknowledgement of this letter shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,

Bryan Staff
Director Planning