
Planning and Affordable Housing Statement

Southern Gas Network Belvedere Holders Stations,
Yarnton Way, DA17 6JP

October 2023

On behalf of Bellway Homes Limited

The Savills logo consists of a solid yellow square positioned above the word "savills" in a lowercase, red, sans-serif font.

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1. Introduction

- 1.1 This Planning Statement has been prepared in support of an application for full planning permission submitted to the London Borough of Bexley (LBB) by Bellway Homes Limited (the applicant) for the proposed redevelopment of the site at the Former SGN Gas Holder Site, Belvedere, Bexley, DA17 6JR (the site).

Description of Development

- 1.2 This Planning Statement is submitted in support of an application which seeks full planning permission for the following:

Redevelopment of the site to provide residential units including affordable housing (Use Class C3) and commercial floorspace (Class E) in new buildings ranging between 3 to 5 storeys in height, together with associated car parking and cycle storage, landscaping including new areas of public open space and a reptile retention zone, associated infrastructure including new junctions off Yarnton Way, drainage and land raising.

Supporting Documents

- 1.3 This Planning Statement should be read in conjunction with the plans and drawings prepared by Stockwool Architects, as well as the following documents which have been prepared to address the full range of planning considerations:
- Design and Access Statement prepared by Stockwool;
 - Drawing Pack, including Photomontages and Street Scenes prepared by Stockwool;
 - Landscaping Plans, including Urban Greening Assessment prepared by Macfarlane;
 - Air Quality Assessment prepared by Ardent;
 - Biodiversity Net Gain Report prepared by Phlorum;
 - Preliminary Ecology Appraisal prepared by Phlorum;
 - Construction Logistics Plan prepared by Ardent;
 - Construction Environmental Management Plan prepared by Bellway;
 - Site Waste Management Plan prepared by Ardent;
 - Ground Investigation Contamination Report prepared by Idom;
 - Financial Viability Report prepared by Savills;

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- Daylight and Sunlight Report prepared by EB7;
- Tree Survey and Arboricultural Assessment prepared by SJA;
- Energy and Sustainability Assessment prepared by Hodkinson;
- Dynamic Overheating Assessment prepared by Hodkinson;
- Flood Risk Assessment and Drainage Strategy prepared by Ardent;
- Noise Impact and Vibration Assessment prepared by Ardent;
- Statement of Community Involvement prepared by Thorncliffe;
- Healthy Streets Transport Assessment prepared by Ardent;
- Travel Plan prepared by Ardent;
- Fire Statement prepared by Frankham;
- Circular Economy Statement prepared by Hodkinson;
- Carbon Lifecycle Assessment prepared by Hodkinson; and
- Telecommunication Statement (within this Planning Statement) prepared by Savills.

Structure of the Statement

1.4 The structure of this Planning Statement is as follows:

- **Section 2** (Background) provides a description of the site and surrounding context as well as the background to the proposals;
- **Section 3** (Proposed Development) provides a summary of the development proposals;
- **Section 4** (Planning Policy Context) sets out the relevant planning policy framework;
- **Section 5** (Affordable Housing Statement) provides a detailed assessment of the proposed Affordable Housing Provision ;
- **Section 6** (Planning Considerations) provides a detailed assessment of the planning considerations arising from the application proposals; and
- **Section 7** (Conclusion) provides a summary of the proposals and our conclusions on the planning considerations.

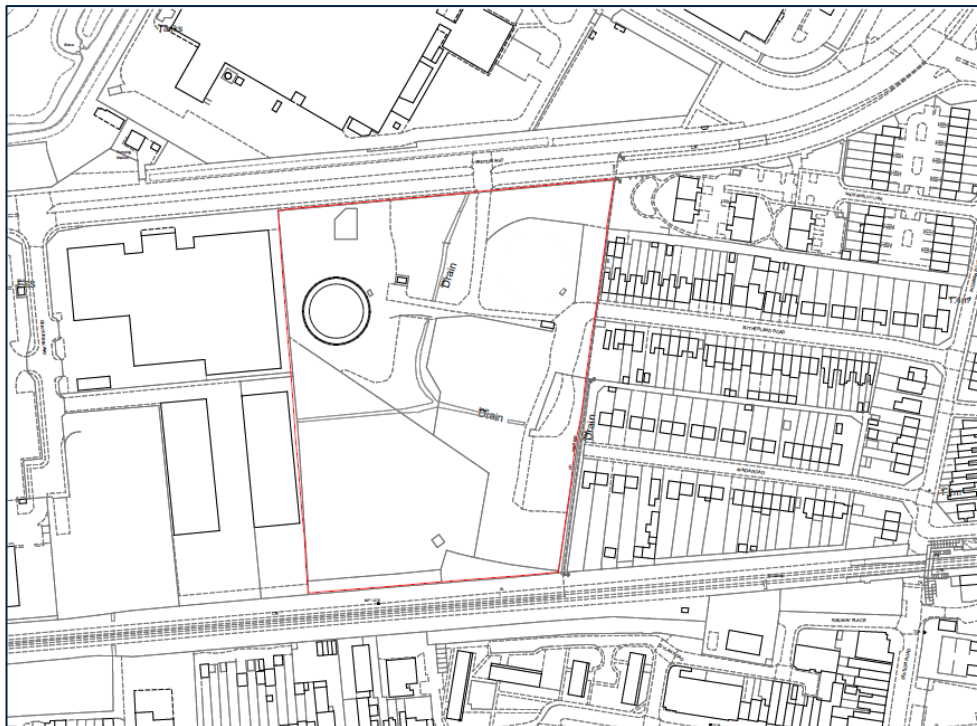
2. Background

2.1 This section provides a brief description of the site and the immediate surrounding area which forms part of the context in which the application proposals have been developed.

The Site and Surrounding Area

2.2 The site is situated in Belvedere, south of the River Thames, east of Abbey Wood and Thamesmead, west of Erith, and north of Bexleyheath. The site is bound to the north by Yarnton Way (a dual carriageway). To the south, the site is bounded by the existing railway link linking Belvedere and Abbey Wood Stations. To the east are areas of terraced and semi-detached housing, and to the west are industrial buildings. The site sits to the north of the boundary of Belvedere District Centre. The application site measures approximately 3.46 ha, as shown in **Figure 2.1**.

2.3 Figure 2.1: Site Location Plan



- 2.4 The site is a former utility site managed by SGN. It does not function as a operational gasholder and was made redundant in 2013. The site currently contains one column-guided above-ground gasholder located in the north western part of the site, however prior approval has been granted for its removal (LPA Ref. 21/02481/PRIORD01). A Cellnex telecommunication mast is currently located on the existing gas holder. This will need to re-provided as part of the redevelopment of the site. The intention at this stage is that this will be provided on proposed Block B. A temporary location will need to be found for the mast during the construction of the site.
- 2.5 At present the site requires ongoing management and maintenance to inspect and maintain the gas pipes that traverse it. A relatively new gas governor structure is located on the eastern boundary of the site adjacent to the end of Sutherland Road. This will remain in place as part of the redevelopment of the site. The mains are maintained and kept clear of any vegetation.
- 2.6 Following the adoption of the LBB Local Plan in April 2023, the site is located in a Sustainable Development Location and allocated for residential development for approximately 465 new homes (BEL05 Belvedere Gas Holders). It is important to note that the allocation does not refer to this being either the maximum or minimum requirement for homes.
- 2.7 The site falls within Flood Zone 3, albeit within an area benefitting from flood defences. A robust strategy to deal with the potential risk of flooding has been developed by the Applicant, and set out within the Flood Risk Assessment prepared by Ardent Consultants.
- 2.8 The site has a PTAL rating of 2-3 and is located approximately 0.2 miles northwest of Belvedere railway station. Abbey Wood station, is approximately 1.2 miles to the west and will serve Crossrail services. As well as this, bus stops providing access to 3 services are located approximately 150m to the east along Yarnton Way.
- 2.9 The site is located in the Bexley Riverside Opportunity Area which is identified in the London Plan Policy SD1 to deliver 6,000 new homes and around 19,000 new jobs. More widely, LBB is located within the designated Thames Gateway Area, a large scale regeneration opportunity that extents to the north and south of the site along the River Thames from London out to the estuary. The Plan notes that the corridor either side of the Thames Estuary represents the largest concentration of Opportunity Areas in the City. continues to be a priority for regeneration and economic development, with the potential for over 250,000 homes and 200,000 new jobs.

Planning History

2.10 A planning history search in relation to the site has been conducted. The Council's online records indicate that the following planning applications have been submitted at the site:

- 21/02481/PRIORD - Prior Notification for demolition of gasholders - Prior Approval Granted – 17.09.2021
- 20/02026/GPDOT – Continuation of Hazardous Substances Consent following a change in control of part of the land – Approved with conditions – 01.11.2001
- 02/00588/HAZ – Continuation of Hazardous Substances Consent following a change in control of part of the land – Approved – 17.04.2002
- 02/02732/GPDO8 – Proposed installation of 3 x sigma omni antennas with supporting apparatus at height of 25m, 1 x sigma omni antenna with supporting apparatus at height of 39m on existing gas holder, ground floor equipment cabin and ancillary development – Withdrawn
- 02/02749/GPDO8 – Installation of 3 no. panel antennas with supporting apparatus at a height of 33.8m, 4 no. 600mm dish antennas at a height of 32.26m on existing gas holder with ground floor equipment cabinets and ancillary development – Withdrawn
- 02/02950/FUL – Installation of 3 no. panel antennas with supporting apparatus 15.7 m high, 2 no. dish antennas 31.5m high and 2 no. dish antennas 32.0m high on the Gas Holder with an equipment cabinet and ancillary development at ground level – Refused – 09.01.2003
- 02/05665/GPDO8 – Installation of 6 no. panel antennas with supporting apparatus at a height of 35.0m, 4 no. 600mm dish antennas at a height of 33.5m all on the existing Gas Holder, with 10 pack ground floor equipment cabinets and ancillary development – Refused – 09.01.2003
- 03/00610/GPDOT – Notice of permitted development for the installation of 3 no. face mounted panel antennas to existing gas holder and 2 no. outdoor equipment cabinets – Observations sent – 13.03.2003
- 04/01695/GPDOT – Notice of permitted development for the installation of 6 panel antennas, 2 transmission dishes and 3 equipment cabinets – Approved – 13.05.2004
- 04/03686/GPDO8 – Installation of 1 additional equipment cabinet in connection with the existing telecommunications base station – Approved – 09.08.2004
- 20/02026/GPDOT – Notification of permitted development for telecommunications apparatus comprising the removal of 3 x Jaybeam antennas and 3x Ultrasite cabinets and installation of 6x Commscope antennas, 12 x RRU units, 3x High level combiners, 6x BoB's, 1x 4th Eltek cabinet, 2x NSN flat pack frames and 1x GPS module – Approved – 15.09.2020

Pre-Application Advice and Public Engagement

- 2.11 Prior to the submission of this application, in accordance with the requirements of the NPPF, the Applicant has proactively engaged in extensive pre-application discussions with officers at LBB and the GLA, the Design South East Design Review Panel, and incorporated their feedback as much as possible to ensure the proposals comprise sustainable development. The Applicant has also discussed the proposals with the Leader of the Council and presented the proposals to redevelopment the site to the local community.
- 2.12 The pre-application discussions to redevelop the site have been meaningful with the discussions first commencing in in January 2020. A number of iterations of the scheme have been presented and discounted over the years for a variety of reasons including viability issues of delivering a taller building through the use of Reinforced Concrete Frame construction.
- 2.13 The pre-application meetings were held in the following months:
- January 2020;
 - July 2021;
 - October 2021;
 - November 2021 (GLA);
 - February 2022;
 - March 2022 (DRP);
 - September 2022; and
 - July 2023.

Public Consultation

- 2.14 A number of revisions were made to the layout and design of the scheme during the pre-application process in response to feedback from officers. The scheme has also been presented to L.B Bexley's design review panel – Design: South-East. At a political level, various iterations of the scheme have been presented to the Leader of the Council and various local Councillors.
- 2.15 Prior to submission of this application, the applicant has held two public consultation events, the first of which was held in Jan/Feb 2022 presented the proposals via a website whereby comments could be

submitted. The second event was held in June 2023 and involved two online presentations whereby queries were answered by members of the design team.

2.16 This application is the product of extensive public consultation and collaboration with the Council and is considered to incorporate as much feedback as possible to ensure this application comprises a high quality and well considered proposal. A number of important changes were made as a result of consultation as a whole, as follows:

- Removal of vehicular through routes to the side roads of Maida and Sutherland Road, which are limited to pedestrian and cycle access only. Only the exit and entrance points on Yarnton Way are for vehicular use.
- Safeguarding a BRT route through the site and running through to Maida. The scheme is not proposing to deliver the scheme but proposes to safeguard a route should the Council wish to bring this forward at a later date.
- Greater variety of typology of units including three storey townhouses, duplex apartments, five storey blocks interlinked with setback four storey elements and five storey finger blocks. This has been done to support a varied housing provision, enhance the dual aspect provision, provide more family housing and to ensure that none of the blocks exceed 8 units per core.
- Reduction in car parking to a car-lite scheme comprising of a 40% car parking provision.
- Greater variation in height including buildings ranging between 3 and 5 storeys.
- Provision of commercial space fronting onto Yarnton Way including both an ancillary residents only gym and commercial retail space. The design of the blocks at this location incorporate a 'spill-out' area to support place-making and ensure users interact with the development at this location.
- Incorporation of a large areas of public open space across the development including a principal communal area located on the eastern side of the development in sight of the junctions of Maida and Sutherland Road.
- Rational placement of typologies with lower rise three storey housing proposed to be located adjacent to the sensitive site boundaries. Taller buildings located in the less sensitive areas of the site.
- Provision of a 250 sqm of space within the site reserved for tiny-forest scheme and maintenance of a reptile retention zone located to the rear of the site to accommodate and enhance the provision of habitats. Increase in public open space across the site to 13,661 sqm.

3. Proposed Development

- 3.1 This Section provides a summary of the application proposals; full details are set out on the application drawings and in the Design and Access Statement prepared by Stockwool Architects and submitted in support of this application.
- 3.2 The application proposes the redevelopment of the former utility site to deliver a contemporary high quality residential development within Belvedere in close proximity to the boundary of the District Centre. The existing gasholder on site will be removed during the determination of this application to redevelop the site in line with the adopted site allocation.
- 3.3 The proposals involve the construction of a series of new buildings comprising a total of 392 dwellings. The layout will follow the adjoining residential grid with the internal roads linking and connecting to Sutherland Road and Maida Road. The master plan is based on maximising the front doors and activity at street level through the introduction of duplex apartments on the ground and first floors. Communal entrances will be located on the prominent corners of the blocks.
- 3.4 The proposed scheme will include circa 93.31 sqm of residents' gym which is located at the site vehicular entrance on Yarnton Way, as well as 218.31 sqm of commercial floorspace which will be used as a use falling with Class E.
- 3.5 On street parking is provided at the east side of the development site and within the central and eastern courtyard areas. The intention is to deliver parking at a ratio of approximately 0.4 spaces per dwelling.
- 3.6 The description of development is set out as follows:

“Redevelopment of the site to provide residential units including affordable housing (Use Class C3) and commercial floorspace (Class E) in new buildings ranging between 3 to 5 storeys in height, together with associated car parking and cycle storage, landscaping including new areas of public open space and a reptile retention zone, associated infrastructure including new junctions off Yarnton Way, drainage and land raising.”

Residential Accommodation

- 3.7 The proposals comprise the development of a total of 392 new homes across a series of blocks and townhouses. This is split by 317 (80.9%) flats and 75 (19.1%) houses.
- 3.8 The proposals comprise 392 new dwellings, 40 (10%) of which will be provided as affordable rent (London Affordable Rent). The proposals comprise a mix of unit types and sizes as set out in Table 3.1.



Table 3.1: Proposed Residential Mix

	Private	Affordable	Total
1 Bedroom	109	9	118
2 Bedroom	145	15	160
3 Bedroom	80	16	96
4 Bedroom	18	0	18
Total	352	40	392

- 3.9 As set out in Table 3.1, 40 of the units (10% of the total number of dwellings) are proposed to comprise affordable housing. The proposals have been designed to be tenure blind and to create a mixed and balanced, sustainable community through the provision of affordable housing across the site. The affordable homes are located in Block A1, Block B1 and Houses D1.00.01 and D1.00.02. The Applicant will be exploring the use of grant to increase the affordable provision.
- 3.10 All of the proposed dwellings have been designed to be of a high quality, with high levels of accessibility, flexibility and sustainability. 353 (90%) of the proposed new homes have been designed to meet Part M4(2) standards and 39 (10%) of the proposed dwellings will be meet Part M4(3) standards. The wheelchair units are spread across the affordable and private units. The wheelchair dwellings within the affordable tenure comprise as accessible units rather than adaptable. In addition, all of the dwellings will meet the Nationally Described Space Standard for internal space.
- 3.11 All of the proposed houses are provided with private external open space comprising rear gardens. Where the proposed apartments are not provided with gardens, the external amenity provision is provided as either a private terrace or private balcony. All proposed dwellings are located in close proximity to a large areas of open space spread across the scheme. Overall, the scheme provides 14,751 sqm of public amenity space and landscaped areas which will provide amenity to both the new residents of the development and existing residents in the vicinity of the site.
- 3.12 The proposed development will include a residents only gym of 93.31 sqm and a commercial unit located at the northern end of the site measuring 218.31 sqm adjacent to Yarnton Way. The commercial unit will fall within Class E of the Use Classes Order and will likely comprise of a small café or coffee shop to serve the development and wider area.

Layout

- 3.13 The proposed layout strongly reflects the adjoining grid position and connects to both Sutherland and Maida Road. The propose development forms an extension to these road layouts with blocks splayed out from

these roads to generate more space between buildings and to generate areas across the development for large open space.

- 3.14 The proposal will provide approximately 14,751 sqm of communal open amenity space at a variety of locations across the development, equating to 45.097% of the site. The proposals interweave open space alongside the housing while also providing 1,305 sqm of private garden space. The buildings to the north of the site enclose a courtyard which is intended to act as a 'spill-out' commercial area, providing a space for users of the development to enjoy whilst using the commercial units fronting to Yarnton Way. The landscaped area will also include play space. The proposed principal area of communal open space is located just off the centre of the site and in clear sight of the junctions of Maida and Sutherland Road. This area will also include large amounts of doorstep play which will be overlooked by the proposed townhouses.
- 3.15 The proposed orientation and placement of blocks splay out from the communal amenity area to provide a generous and a larger area of communal amenity space. The proposals place townhouses facing onto the large communal open space to the east of the site. These properties are set back from the amenity space to provide clear and open views to this area and to enhance the level of daylighting over the space.
- 3.16 The proposals include a new 'tiny forest' habitat to rear of the site measuring approximately 250 sqm and a habitat retention zone of 2,200 sqm. The proposals deliver a high quality landscaped scheme and will provide essential areas across the site for retention and enhancement of habitats.
- 3.17 The proposed layout will include a variety of blocks and types of housing. The centre of the site includes a series of three storey townhouses. These blocks sit in line with the grid of the surrounding roads and follow closely the lower rise elements on Sutherland and Maida Road. These central properties will be visible from the two pedestrian/cycle access points at the eastern edge of the site. The proposed development therefore adopts a subtle rise and transition from the existing two storeys on Maida and Sutherland Road to three storeys at the central part of the development. This is considered an appropriate response to the existing lower rise elements.
- 3.18 The rear part of site includes the taller finger blocks adjacent to the railway line to the south. These blocks are intersected by large areas of communal open space including play areas. The proposed placement of play at this location will benefit from high levels of natural surveillance due to the number of openings that overlook the space. The tiny-forest area and habitat retention zone are located to the rear of the site. The typology of the proposed blocks to the front for the site is varied with a series of five storey blocks intersected by set-back four storey interlocking blocks to provide interest and variation along Yarnton Way. The typology also includes three storey townhouses that are bookend by taller five storey apartment blocks which assist in providing a visual termination to the street.

3.19 The proposed development includes two new junction off Yarnton Way which will be used for vehicular entry into the site. As well as this, bike and pedestrian access will be possible via a shared surface on Maida Road and Sutherland Road. In total there will be 157 car parking spaces (inclusive of 12 wheelchair spaces) which allows for 0.40 spaces per dwelling. The proposed layout safeguards a future public transport route through the site from Yarnton Way through to Maida Road for a possible BRT route. The safeguarded route is supported by tracking details that demonstrates that the development would not preclude the delivery of a rapid transit bus through the site, should the Council wish to deliver this in the future.

Materials and Architectural Character

3.20 The character and appearance of the proposed development has been informed by a detailed analysis of the surrounding context and have been adjusted accordingly to increase public realm and to deliver a high quality development overall.. The chosen materials for the proposed development comprise of a mixed selection of brick types. A mix in colours of reds, dark reds, light orange and browns will aim to create a vibrant contrasting mix of colours to each of the buildings. The material palette of the proposed development comprises a selection of colours and materials that have been chosen to ensure the scheme is visually dynamic and characterful.

3.21 Two types of coloured brick are proposed for the building façades within the development; subtle variations in colour tone provide the buildings with a unique and separate identity. Each of the buildings will comprise varying window sizes and variations in vertical alignment to bring together simple fenestration patterns within the elevation. Further surface textures will be provided through a range brickwork detailing. Simple steel projecting balconies supported on steel frames will add a further layer of interest, providing residents with views out to the streets and new landscaped public spaces.

3.22 As illustrated by the supporting Design and Access Statement, the rear finger blocks are proposed as five storey blocks that are faced in darker multi red brick work and include pale green metalwork bolt-on balconies. The family of townhouses in the centre of the site are faced in light red multi brick and windows and frames edged in pebble grey metal work. The scheme includes a range of blocks to the north of the site. This includes the semi-circular block that fronts onto Yarnton Way (Block B). Block B is proposed to be faced in dark red brick and facades in dark brown and red metalwork and bolt-on balconies. Blocks A sit at key corner locations across the northern part of the site and are design in dark red multi-brock and include pebble grey surrounds and balconies. Block C fronts the north eastern edge of the site. This block is faced in dark red brick and faced in brown and red metal work and bolt on balconies.

Landscaping and Ecology

3.23 The scheme's landscape proposals have been designed holistically alongside the architectural masterplan to deliver a significantly enhanced site plan from the existing condition.

- 3.24 New native planting including boundary eco-corridors/nature corridor will successfully assimilate the development into the wider landscape. Across the site, tree planting will be carried out to sustain and improve the sustainability of the site. As well as this, to the south-east of the site a 'tiny forest' will be located.
- 3.25 Pedestrian areas between residential dwellings will act as informal play and meeting areas to reinforce a sense of place and community. The private amenity courtyards provide open space to include a formal play area, improving the amenity space available for families.
- 3.26 The proposed development is a landscape led scheme which has been designed to promote public realm and open space which is accessible and connected for all. The site also provides for biodiversity enhancements and an urban greening factor of 0.406. 45.097% (14,715 sqm) of the site is proposed to be public amenity space with an additional 1,305 sqm reserved as private rear gardens.
- 3.27 It is also proposed to incorporate 5,783 sqm of living roof across the site which will contribute to the overall biodiversity and habitat creation on site, as well as 250 sqm of a tiny forest.
- 3.28 In terms of Ecology, it is proposed to provide a significant quantum of ecologically rich habitats to assist the development in achieving good levels of natural habitat and biodiversity on site. It is also proposed to provide 5,813sqm of living roof and 145 new trees across the site.

Access

- 3.29 The access strategy and overall approach to the layout of the site seeks to create clear access to, and circulation within, all parts of the site, that makes appropriate provision for vehicles whilst balancing this with the need to create safe pedestrian environments.
- 3.30 Vehicular access will be located from the north of the site comprising two entry points from Yarnton Way. In addition, bike and pedestrian access roads will form an extension of Maida Road and Sutherland Road and help to facilitate sustainable links to the surrounding residential area. A BRT route is also proposed to be safeguarded through the site. The application does not propose the BRT itself, but only safeguards a route through the site should the Council propose to deliver it in the future.

Car and Cycle Parking

- 3.31 The approach to the scheme's proposed parking provision has been developed to ensure that parking provision is appropriate, in accordance with policy requirements, and located so as to be convenient for residents but also to not detract from the streetscape and the quality of the public realm. A total of 157 car parking spaces are provided, including 12 wheelchair spaces. These are provided as surface level car parking within dedicated car parking courtyards, on-plot driveways or integrated within the street layout.

- 3.32 Cycle storage is also provided for all dwellings in line with the requirements of the London Plan. All dwellings will be provided with space to park their bicycle with a total proposed provision of 728 long stay cycle spaces and 17 short stay spaces. Of the long stay spaces, 150 are associated with the 75 houses and the remaining 577 with the flats and shall be provided within secure communal cycle stores within each block.
- 3.33 Of the 577 cycle spaces, 29 spaces will be accessible bays, 115 will be provided as Sheffield stands and the remaining 433 in the form of two-tier stands. This breakdown is in accordance with Chapter 8 of TfL'S 'London Cycling Design Standards' and advice received directly from TfL.

Telecommunications

- 3.34 The proposed development will include a replacement telecommunication mast located on top of Block B. However, erection of a temporary mast will be required on site during the construction of the development.
- 3.35 Therefore, a temporary mast will be put in place on site, through the use of permitted development rights, specifically Part 4 Class A (Temporary buildings and structures) of the General Permitted Development Order 2015.
- 3.36 The use of Part 4 Class A can be employed for the erection of temporary masts while the redevelopment of the site is ongoing. It is important to note that development is not permitted by Class A if: (a) the operations referred to are mining operations, or (b) planning permission is required for those operations but is not granted or deemed to be granted The operations in this case will be the development.
- 3.37 Therefore, point A above does not apply as it does not relate to mining. In relation to part B, planning permission is required for the operations (i.e. the residential development hereby submitted) and will be secured prior to the submission of the prior notification application for the temporary mast. It is anticipated that the location of the temporary mast will be agreed with Cellnex and the LPA during the course of the determination of this application to redevelop the site.

Sustainability and Energy

- 3.38 The proposed development will maximise reduction in carbon dioxide emissions through the implementation of Be Lean, Be Clean, Be Green and Be Seen energy efficiency measures. Following the implementation of a combination of the energy hierarchy measures, the development has been designed to achieve a reduction of 98% over Part L.
- 3.39 This will be achieved through the use of sustainable design measures. Full details are provided within the Sustainability and Energy Strategies prepared by Hodkinson.

- A full BREEAM Pre-Assessment accompanies the application and shows that the predicted score at this stage is 56.66% - 'very good', representing a high level of sustainable design and construction.
- The proposed development will deliver a 98% reduction in overall CO2 emissions over the Part L 2021 baseline through energy efficiency measures such as connecting to an existing heat network and solar PV.
- The scheme has been designed to ensure overheating risk is reduced to acceptable levels in accordance with CIBSE TM59:2017 requirements.
- Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum internal daily water consumption of 105 litres/person/day.
- Adequate facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
- The principles of a circular economy shall be incorporated into the development, where possible.
- Where practical, new building materials will be sourced locally to reduce transportation pollution and support the local economy. New materials will be selected based on their environmental impact and responsible suppliers will be used where possible.
- Acceptable air and noise quality levels will be achieved on site with proper mitigation measures.
- The proposed development site lies in a high flood risk zone but will benefit from flood defences and SuDs such as ponds, attenuation tanks, permeable paving.
- The dwellings are to target an improvement on Building Regulations Part E through party walls and floors.
- 90% of the new dwellings will be designed to meet Building Regulations Approved Document M4(2) and 10% will meet Part M4(3).
- The site will benefit from close proximity to the Belvedere railways station and sustainable modes will be encouraged through the provision of 740 cycle storage spaces.
- Enhancements will be implemented through the provision of landscaped areas, a 'Tiny Forest' and additional tree and shrub planting across the site.
- The site will aim to achieve a Very Good score with the Considerate Constructors Scheme and will closely monitor construction site impacts.
- The site benefits from access to a good existing public transport network and sustainable modes will be encouraged through the provision of cycle storage spaces and electric vehicle charging points.
- Biodiversity and ecological enhancements will be implemented through the provision of landscaped areas, and additional tree and shrub planting across the site.

Planning Benefits

3.40 The proposals will deliver a comprehensively planned, well-designed, efficient, accessible and high quality new residential neighbourhood and sustainable community. By way of a summary, the proposals will provide a range of planning benefits, as set out below:

- Regeneration of a major, vacant former utility site to provide a high quality residential scheme providing a meaningful amount of new homes in accordance with the sites allocation;
- Removal of the existing poor quality former industrial site which will enhance the visual appearance and safety of the site through the provision of a design-led scheme which has been developed through detailed pre-application discussions with officers at LBB, GLA, Design South East Design Panel, and other key stakeholders. The development will improve the built environment and local townscape providing a carefully considered series of new buildings which will enhance this part of Belvedere with a new residential neighbourhood and will include new usable public realm for existing and new residents;
- The design-led approach for the redevelopment of the site has resulted in a high quality scheme that includes material benefits of 14,751 sqm amount of open space, 2,405 amount of child play space (in excess of the GLA's requirements), 115 family unit provision (29% of the total number of units) and 66% dual aspect provision;
- Delivery of 392 much-needed new homes, including 10% affordable housing provision delivered all as London Affordable Rent and a mix of residential dwelling types and sizes, creating a mixed and balanced sustainable community;
- Delivery of high quality new homes which meet accessibility and internal space standards (within the new buildings); provide high levels of amenity and comfortable living environments;
- The development will deliver a series of new publicly accessible open green spaces across the site which will provide a high quality green setting, enhance urban greening and provide a number of focal points for future residents to enjoy and relax in the new development;
- The development will provide a tiny-forest scheme with a range of new semi-mature and densely planted trees and species rich planting, the development will also include a habitat retention zone and will seek to enhance biodiversity as far as possible through the use of on-site measures; and
- Financial benefits for the local economy, including creation of new jobs during the construction phase of the development, new local spend from residents moving into the development, CIL and S106 contributions.

4. Planning Policy Context

- 4.1 The proposals have taken account of relevant national and local planning policy. This section of the Planning Statement sets out a brief summary of the relevant planning policy documents and the following section demonstrates compliance with their policies.
- 4.2 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 4.3 The development plan comprises:
- The London Plan (2021);
 - Bexley Local Plan (2023); and
 - Bexley Local Plan Policies Map (2023).
- 4.4 The National Planning Practice Guidance (2014, as amended), Supplementary Guidance notes (SPGs) and Supplementary Planning Documents (SPDs) are all relevant material considerations and will be referred to where necessary and appropriate.
- 4.5 The NPPF (September 2023) directs a presumption in favour of sustainable development which underpins the Framework. The National Planning Practice Guidance (NPPG) provides clarity and guidance on the interpretation of policy.

National Planning Policy

- 4.6 At the national level, the Government published its revised National Planning Policy Framework (NPPF) in September 2023. The NPPF provides an overarching framework for the production of local policy documents and at the heart of this document is a presumption in favour of sustainable development.
- 4.7 Achieving sustainable development means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). Sustainable development is defined through three, interdependent objectives:
- **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 growth, innovation and improved productivity; and by identifying and coordinating 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 assessable services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **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.

4.8 In the next section of this Planning Statement, an assessment of the proposed development against the relevant paragraphs of the NPPF is undertaken. However, importantly, paragraph 11 of the NPPF is clear that development that accords with the development plan should be approved without delay.

4.9 In support of the NPPF the Government has published an online guidance resource, known as the Planning Practice Guidance (NPPG). This covers a range of topics including procedural matters, policy application matters, extended guidance on certain topics and clarifications on processes. Where relevant, specific notes are referred to within this Planning Statement.

Local Planning Policy

4.10 As set out above, the current statutory development plan for the London Borough of Bexley comprises following:

- The London Plan (2021);
- Bexley Local Plan (2023); and
- Bexley Local Plan Policies Map (2023).

4.11 LBB also has a number of Supplementary Planning Documents which comprise material considerations in respect of planning applications. Those relevant to the proposals are as follows:

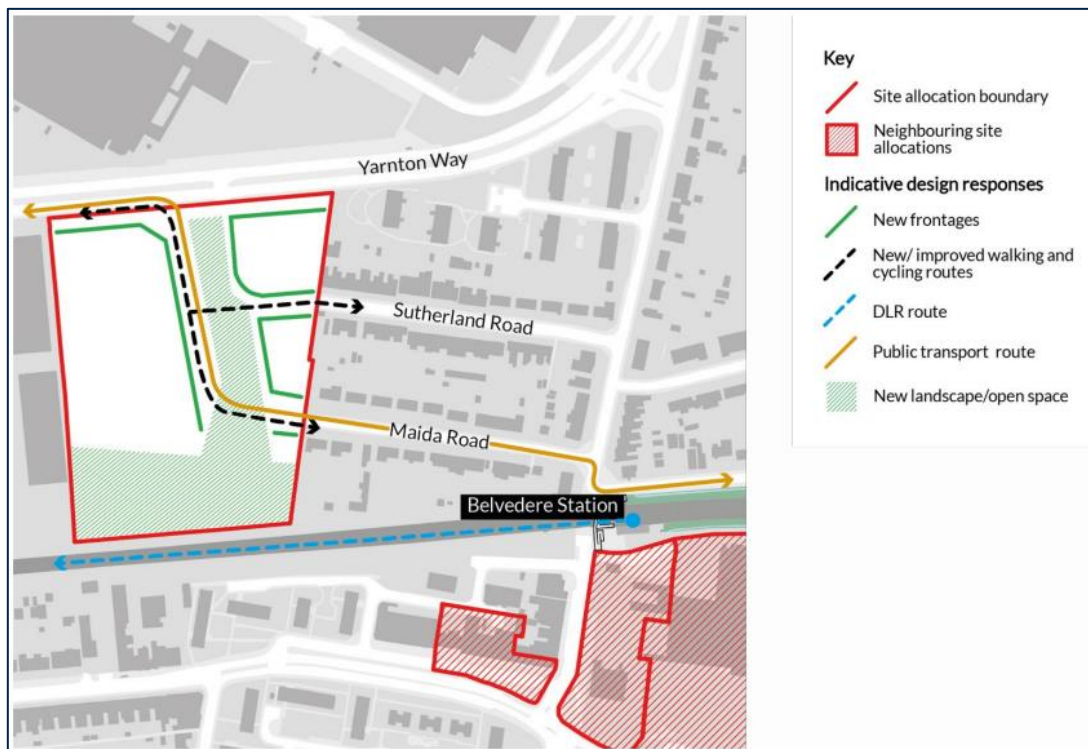
- Affordable Housing SPD (2006);
- Design for Living SPD (2006);
- Design and Development Control Guidelines (2004);
- Planning Obligations Guidance SPD (2008); and
- Sustainable Design and Construction Guide SPD (2007).

4.12 The site is subject to the following planning policy designations, as set out on the Council's adopted Policies Map (2023), each of which are addressed in detail and an assessment against the relevant policies provided in the following section of this Statement:

- Site Allocation BEL05 – Belvedere Gas Holders;
- Tall buildings zone; and
- Flood Zone 3, high probability of flooding from rivers and the sea.

4.13 As noted above, the site benefits from residential allocation BEL05 – Belvedere Gas Holders which allows for the provision of approximately 465 new homes. The allocation further notes that the development of this site should transform the area. The allocation further requires an extensive quantity of new landscape / open space throughout the site which would create a green linear route through the site. It is also required to provide a new, significant habitat on the southern part of the site to restore and enhance its wildlife function. In addition, the allocation allows for improved connectivity through and to the site.

Figure 4.1: Belvedere Gas Holders Site Allocation.



5. Affordable Housing Statement

5.1 This section of the Planning Statement includes the Applicant's Affordable Housing Statement.

Affordable Housing Policy

5.2 NPPF Paragraph 62 states that development proposals must address the needs for all types of housing including affordable homes and the needs of different groups in the community (such as, families with children, older people, students, people with disabilities, service families, travellers and people wishing to build their own homes).

5.3 Paragraph 62 states that:

“where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:

- a) Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
- b) The agreed approach contributes to the objective of creating mixed and balanced communities.”*

5.4 In respect of Affordable Housing, the glossary in Annex of the NPPF states that eligibility for affordable housing 'is determined with regard to local incomes and local house prices.'

5.5 Paragraph 58 states that where a need for a viability assessment has been justified, the following apply:

- The weight to be given to a viability assessment is a matter for the decision maker; and
- All viability assessments, including any undertaken at the plan-making stage should be made publicly available.

5.6 NPPF Paragraph 65 states that *“where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership”*. Affordable Housing is defined in Annex 2 of the NPPF which states that it is *“Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: Affordable Housing for Rent, Starter Homes, Discount Market Sales Housing (DMSH) and Other Affordable Routes to Home Ownership”*.

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- 5.7 London Plan Policy D7 requires applicants to provide a genuine choice of housing to support London's diverse population. Paragraph 10.6.9 states Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.
- 5.8 Policy H4 sets the Mayor's strategic target of 50% of all new homes delivered in London to be genuinely affordable. The measures to achieve this aim includes; requiring all major development which trigger affordable housing to provide affordable housing through the threshold approach. Policy B of Policy H4 confirms that all affordable housing should be provided on site.
- 5.9 Policy H5 sets out the threshold level of affordable housing on gross residential development at:
- 1) A minimum of 35%; or
 - 2) 50% for public sector land where there is no portfolio agreement with the Mayor; or
 - 3) 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial Intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.
- 5.10 Part C of Policy H5 states that to follow the Fast-Track Route of the threshold approach, applications must meet all of the following criteria:
- 1) Meet or exceed the relevant threshold level of affordable housing on site without public subsidy.
 - 2) Be consistent with the relevant tenure split.
 - 3) Meet other relevant policy requirements and obligations to the satisfaction of the Borough and the Mayor where relevant.
 - 4) Demonstrate that they have taken account of the strategic 50% target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.
- 5.11 Policy SP2 of the Local Plan states that the Council's aspirations is to achieve a strategic target of 50% affordable housing. Policy SP2 sets a requirement for 70% of the affordable provision to be low cost rent and 30% to be intermediate housing.
- 5.12 Policy DP1 of the Bexley Local Plan states that residential development proposals with a capacity of 10 or more (gross) dwellings, a threshold approach to affordable housing in line with London Policies H4 and H5 will be taken.
- 5.13 Part 4 of Local Plan Policy states that development proposals that do not meet the affordable housing threshold will be refused unless justified by a full viability assessment that is submitted at the same time that a planning application is submitted.



Proposed Affordable Housing Provision

5.14 The application proposes 40 affordable dwellings, meaning 10% of the total housing provision is proposed as affordable. The proposals comprise a mix of unit types as set out in **Table 1**.

Table 1: Proposed Tenure Split

Unit Type	Private	Affordable Rent	Total
1 Bedroom	109	9	118
2 Bedroom	145	15	160
3 Bedroom	80	16	96
4 Bedroom	18	0	18
Total	352	40	392

- 5.15 This shows that the scheme will deliver the 10% affordable housing and all of the units will be provided as affordable rent (London Affordable Rent). Given that the site is a former industrial utility site, the requirement to achieve fast-track status would be 50%, by habitable rooms. It is noted that the proposals provide below this requirement and therefore a Financial Viability Assessment has been submitted in accordance with the prevailing policy requirements. Whilst this level is below the affordable housing target, it is important to note that this still delivers 40 low cost rent dwellings which is a significant benefit of the scheme. LBB has in recent years only approved 14 low cost rent dwellings (since 2020) which is a significant shortfall against its aspirations of delivering 50% of its homes as affordable housing (Source: London Datastore).
- 5.16 We note that Figure 3.6 of LBB's Strategic Housing Market Assessment (2021) summarises the relative affordability of alternative tenures at Borough level. It indicates that only social/London Affordable Rent are affordable for household on lower quartile earnings. For households on median earnings, all rental options are affordable in addition to lower quartile renting. Shared ownership at a level of 25% is just outside the affordable threshold for median income households.
- 5.17 We therefore consider that the delivery of 40 affordable homes (all as London Affordable Rent) to be a material benefit to the proposals given that these homes are the most affordable to those households on low and middle incomes.
- 5.18 Given the policy position, the planning application is supported by a Financial Viability Assessment which has been prepared by Savills in support of the application and follows the requirements for Viability Assessments as set out at Policy H5 of the London Plan and Section 3 of the Mayor's Affordable Housing and Viability SPG. The Assessment demonstrates that the maximum viable amount of affordable housing will be provided on site.

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Summary

5.19 The proposed development will provide 392 new dwellings. This includes 40 affordable units, thus providing an affordable housing offer of 10%. While the proposed quantity does not satisfy policy requirements, this application is supported by a Viability Assessment which shows that this provision is the maximum reasonable amount of affordable housing. However, the proposed level of affordable housing makes an appropriate satisfactory contribution to meet the housing need in the borough and constitutes a planning benefit.

6. Key Planning Considerations

6.1 This section sets out the main planning consideration arising from the application proposals with reference to the planning policy framework set out at Section 4.

Principle of Development

6.2 The site is a former utility site which has been fully decommissioned by SGN. The site is a previously developed urban land parcel comprising of one large column guided gas holder. The site previously included two gasholders, however one was removed in the process of decommissioning the site in 2013 following an application for prior approval for its demolition and removal in 2021 (Ref. 21/02481/PRIORD). The second will be removed throughout the determination of this application. The proposed development represents an excellent opportunity to create a new mixed-use residential quarter in a strategic location.

6.3 The NPPF (2023) includes a presumption in favour of sustainable development, through the effective use of land driven by a plan-led system, to ensure the delivery of sustainable, economic, social and environmental benefits. The NPPF promotes the efficient use of land with high density development in accessible locations.

6.4 Local authorities are expected to significantly boost the supply of housing, and applications should be considered in the context of the presumption in favour of sustainable development. Planning applications are to be determined in accordance with the development plan unless material considerations indicate otherwise (Paragraph 47). This ensures that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

6.5 Paragraph 60 of the NPPF states that in order 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. The NPPF also promotes the efficient use of land with high density development in accessible locations.

6.6 The site is located in the Bexley Riverside Opportunity Area as designated by the London Plan. London Plan Policy SD1 states that development in Opportunity Areas are expected to optimise residential and non-residential outputs and contain a mix of uses. The Bexley Riverside Opportunity Area is expected to have capacity of 19,000 jobs and 6,000 homes.

6.7 In further support of the principle, Paragraph 6.5.3 of London Plan makes specific allowances for former utility sites to deliver new homes. Alongside these provisions, Policy H1 of the London Plan states that Borough's should optimise the potential for housing delivery on all suitable and available brownfield sites

through their development plans and utilise the following sources of capacity, which includes (d) the redevelopment of surplus utilities and public sector owned sites.

- 6.8 In addition, the Mayor seeks a minimum of 650 homes a year in the Borough (Table 4.1 of the London Plan – 10 year housing target), and at local level, Policy SP2 of the Local Plan states that the Council will seek to provide for 6,850 new homes in accordance with the London Plan’s 10-year target, and then seek to provide at least 6,165 new homes between 2030 – 2038. It is evident that there is a need to deliver housing on all available previously developed sites across the Borough, particularly surplus utility sites in order to respond to these housing targets. However, the new homes should be delivered in a sustainable manner and follow good planning and design principles. Therefore, a design-led approach in accordance with Policy D3 of the London Plan has been followed to achieve an appropriate form and level of development to sustainability meet the prevailing housing targets.
- 6.9 The site is allocated for redevelopment within the 2023 Bexley Local Plan (Ref. BEL05 – Policy SA7) for residential development thereby removing its former designation as an employment site. The allocation sets out an indicative approach to development and provides an indicative site capacity of approximately 465 new homes. The capacity is only indicative and not identified as either a minimum or maximum requirement.
- 6.10 Overall, the site is a former utility site, located in Bexley Riverside Opportunity Area, close to Belvedere District Centre and station, adjacent to a residential area and allocated for residential development in the Local Plan. It is therefore clear that the principle of the redeveloping the site is acceptable in accordance with prevailing planning policy. This position is also set out in the pre-application advice from officers over the last few years in which they have strongly supported the principle of redevelopment of the site. The principle of providing new residential use on the site is supported at national, regional and local levels of planning policy. The development will provide 392 high quality homes which make a positive contribution towards regional and local housing need.
- 6.11 In relation to compliance to the three strands of sustainability, the proposals will deliver a range of social, economic and environmental benefits as follows:
- **Social:** The development will support a strong, vibrant and healthy community by providing a range of new homes suitable for first-time buyers, families and people looking for affordable low cost properties. The development will deliver a significant number of new homes, contributing towards the Boroughs housing target and responding to local need, and will ensure that an increased range of homes are provided to meet the needs of present and future generations. All are designed as Part M4(2) accessible, with 10% designed to M4(3), and able to be adapted for people with different abilities. The new homes will be provided with spacious internal areas

meeting the internal floor area standards set out in the Nationally Described Space Standards and all units will have private amenity space in the form of balconies, gardens or terraces. The residents of the development, as well as locals within the vicinity of the site, will have access to a number of high quality communal amenity areas across the development. A large central communal amenity area will provide a focal point for individuals from the development, and from the wider area, to come together and interact with the development and each other. The development will provide 2,405 sqm of play space, in excess of the Mayor's standards. Furthermore, the development is supported by a residents only gym and commercial space located at the northern part of the site fronting onto Yarnton Way. The non-residential space includes a spill-out communal amenity area located adjacent to Block B. Together these spaces will support social interaction and will enhance the quality of the environment and development as a whole. The development is well-designed with high quality landscaped areas and open space and will provide a safe built environment, with excellent pedestrian accessibility to the wider area. The development also includes a safeguarded route for a potential BRT rapid transit bus through the site connecting Yarnton Way to Maida Road.

- **Economic:** The proposed development will contribute to helping build a strong, responsive and competitive economy, by bringing forward housing and commercial floorspace on an allocated housing site. The development will support growth of the local economy during the construction period and also provide long-term additional spend in the local economy as new residents move into the area and use local shops, and spend money on local services. A number of direct and indirect jobs will also be supported during the construction period and once the development has been completed.
- **Environmental:** The proposed development will contribute to protecting and enhancing the natural environment, seeking to optimise the development potential of this previously developed site in a sustainable location. The proposed development is below the indicative site capacity with regard to unit numbers, however, this has been done to ensure the delivery of a high quality scheme particularly with regard to access to the provision of environmental and amenity space, dual aspect provision and family housing. The proposals will remove the existing poor quality appearance and redevelop the site to provide a high quality residential scheme. The proposals seek to introduce a mixture of landscaping and planted elements which will be used to form high quality public and amenity space and will provide a high quality landscaped focus for the development. The development will enhance biodiversity on site as far as possible. This includes the delivery of a 'tiny-forest' scheme at the south eastern corner of the site with dense tree planting, as well as maintenance of the habitat retention zone to the rear of the site. The proposed development will provide 14,751 sqm of communal amenity space, in excess of Bexley's standards. The proposed development will safeguard a rapid transit route through the site, and

will also provide pedestrian and cycle connections from Yarnton Way to Maida and Sutherland Roads, to encourage more sustainable links to Belvedere Station.

6.12 The proposed development meets the three pillars of sustainable development in line with the NPPF, it is therefore considered that the application proposals are acceptable in principle and comply with the requirements of the London Plan and Bexley Local Plan.

Addressing the Site Allocation

6.13 The site is allocated for primarily residential development under Policy SA7 (Site Reference: BEL05 Belvedere Gas Holders). The policy requires a design-led approach and states that the site could provide approximately 465 new homes, however, this is subject to compliance to the development approach set out at Part 2 of the Site Allocation. Part 2 of the Site Allocation states;

“Development of this site should transform the area. As well as meeting other policy requirements, proposals should:

- *Establish a consistent building line along Yarnton Way to create a strong connection between the built form and street with clear definition between public and private spaces.*
- *Establish a legible and permeable internal movement network with active frontages that connects to adjacent streets.*
- *Create a green linear route through the site that provides a high quality environment for pedestrians.*
- *Not preclude a public transport route through the site by establishing a street alignment that will enable a future bus-connection, connecting Yarnton Way with Maida Road.*
- *Introduce new, significant habitat on the southern part of the site, in order to restore its wildlife function, as well as allow for appropriate public access.”*

6.14 The London Plan is clear that a design-led approach is critical to optimise a sites capacity in a sustainable way. Policy D3 of the London Plan (Optimising Site capacity through the design-led approach) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. It states further that optimising site capacity means ensuring that development is of the most appropriate form and land use.

6.15 Part 1 of Policy D3 states that development must enhance local context by delivering buildings and spaces that positively respond to local distinctiveness and due regard must be paid to existing and emerging street hierarchy, building types, forms and proportions.

- 6.16 Part 6 requires active frontages and Part 7 relates to the need to deliver appropriate outlook, privacy and amenity. Part 11 states that the design should respond to the existing character of a place by identifying the special and valued features.
- 6.17 A design-led approach has been adopted from the outset in developing the proposed development for the site. This involved a detailed analysis of the site and the local area, taking into account the opportunities and constraints of the site, and context and character. The layout, scale and massing, architectural quality and landscaping have all responded to this detailed analysis and are appropriate to the site and surrounding areas.
- 6.18 The design development has evolved through extensive discussions with planning and design officers at the Council and the GLA, and with members of the Design Review Panel, as well as the local community and key stakeholders. The pre-application process started in 2020. A detailed description of the main design principles underpinning the proposed development is set out within the Design & Access Statement submitted with the planning application.
- 6.19 Careful consideration has been given to the siting, scale and massing of the proposed buildings in relation to the existing street pattern and built form, and the impact from key views. In addition, careful consideration has been given to the proposed areas of open space, key frontages, street hierarchy, and pedestrian routes through the site. The proposed development falls below the indicative site capacity of approximately 465 homes, the planning application proposes 392 homes. However, it is the Applicant's firm position that this is an appropriate number of homes for the redevelopment of the site. A number of schemes (and higher density options) have been prepared and discounted for a number of reasons, principally as they have fallen fowl of a number of environmental, amenity and quality standards.
- 6.20 The iterative design evolution has also taken into consideration the impact of the proposals on the surrounding amenity and environment, and as demonstrated through the submitted plans, the proposed development does not give rise to unacceptable harm. Furthermore, the proposals have been shown to meet the relevant standards in policy in order to deliver an exemplar design quality.
- 6.21 The following sets out in further detail the requirements of the Site Allocation BEL05 and the Applicant's response. This demonstrates that additional units to meet the 465 figure within BEL05 is not possible due to site and viability constraints:

The design-led approach for optimising site capacity indicative the provision of approximately 465 new homes:

6.22 The proposals optimise the density of the development on site by utilising a carefully considered design-led approach that increases the number of homes whilst taking into account the character of the surrounding area and the notable constraints of the site. The proposals of 392 units have been driven by the following matters:

Compliance to character and context

6.23 The site is identified as a location for Tall Buildings and Policy DP12 of the Local Plan states that areas in Lower Belvedere as defined by Figure 6 could rise up to 45 metres in height (roughly 15 storeys). Part 4 of Policy DP12 states that tall buildings should not have an unacceptable adverse impact on local character and not have an unacceptable adverse environmental impact.

6.24 Firstly, in consideration of the surrounding urban grain, the existing architectural context is clearly for lower rise buildings, the residential dwellings to the east of the site boundary are all two storeys and the industrial buildings to the west are equivalent in height of 3 to 4 residential storeys. A building of 15 storeys at the site would sit in stark contrast to the lower rise homes on Sutherland and Maida Road. The proposed development follows the requirements of Policy D3 of the London Plan as the proposed scale and layout of the new homes reflects the existing character of place following the existing building types, street hierarchy and arrangement of buildings and streets in the vicinity of the site.

6.25 The proposed layout strongly reflects the adjoining grid position and connects to both Sutherland and Maida Road. The proposed development forms an extension to these road layouts with blocks splayed out from these roads to generate more space between buildings and to generate areas across the development for large open space and views. The scheme delivers a variety of unit types which include 3 storey townhouses and maisonettes as well as 4 and 5 storey apartments. This ensures compliance with the surrounding context, but also offers architectural variety and interest for the new residential neighbourhood. The scheme responds to the local streets by delivering a higher number of front doors through the use of duplex units and townhouses, thus creating activation along key streets similar to the design character to the residential terraces on Maida and Sutherland Road. The central building blocks are all three storey townhouses. This provides a visual link and appropriate transition up from the lower rise elements from the surrounding areas.

6.26 Key corners and frontages across the development rise up to four or five storeys which delivers variation in height and helps to define key routes and access points across the development. The range of heights between 3 and 5 storeys is entirely appropriate for the area. Taller buildings would sit out of scale with the surrounding urban grain and therefore not result in compliance to design related policy (London Plan D3 and Local Plan DP11). Both of these policies seek developments that are complimentary to the layout, height, scale and massing, façade treatment and materials of the surrounding area.

- 6.27 In addition, in previous pre-application discussions where taller buildings had previously been proposed, they were previously resisted by officers. The pre-application advice received from officers in 2020 was based on a scheme that included buildings up to 15 storeys in height. The Council at that time resisted this, and stated that: *“officers have a number of concerns regarding the initial approach to height and if this is justified in this locations... it is more than likely that similar density could potentially be achieved without the scale and height proposed.”* (LPA Ref. 19/03053/PREAPP).
- 6.28 In addition, later iterations of the scheme which included taller buildings in the centre of the site were also resisted as it was considered to represent a stark transition from the lower rise homes on Maida and Sutherland Road. This narrative relates to paragraph 4.27 of the Local Plan which states that *“where a taller building is proposed for housing, this policy requires developers to submit alternative design approaches that employ more traditional typologies to demonstrate whether equivalent residential densities can be achieved.”* The supporting Design and Access Statement submitted in support of the planning application illustrates that the scheme has followed an iterative process.
- 6.29 We therefore consider that the proposals ranging between 3 and 5 storeys is sympathetic to the existing context and minimises the number of issues.

Ground floor pressures in relation to car parking

- 6.30 It is also important to note that the delivery of more units would lead to additional pressures on the ground floor layout. This includes the need to deliver more car parking which will conflict with the requirements for amenity, play and communal open space. Policy DP23 of the LBB Local Plan relates to parking management and states that *“proposals for residential development will be expected to provide parking within the lowest applicable maximum London Plan standard.”* Within the London Plan, Table 10.3 stipulates maximum standards for Outer London sites with a PTAL of 3. The maximum allowable provision is 0.75 spaces per 1-2 bed dwelling, and up to 1 space per 3+ bed dwelling. Based on the proposed mix the development should provide a maximum of 322 spaces. It should be reiterated that these standards are maxima and the London Plan advocates developments that are well connected to public transport, such as the site, to be car-lite. In this instance, the Applicant is providing 0.4 car parking provision which has been agreed with Officers as an acceptable response. However, additional units would mean a need for even more car parking spaces to maintain a 0.4 ratio. Additional surface level parking would result in a reduction in the overall quality and quantum of the landscaping and amenity proposals.

Requirement to achieve BNG

- 6.31 As of November 2023, major developments are required to provide a biodiversity net gain of 10% on site. In accordance with the Site Allocation a BNG assessment has been carried out. This has been undertaken

at the sites baseline position. The baseline ecology position was taken 30th January 2020. This is the date prescribed by the Environment Act which requires that any assessment taken beyond this date needs planning permission or robust justification. In this case, the site is regularly cleared as works are undertaken to facilitate maintenance of the gasholders previously on site. However, on the 30th of January 2020, the site was in a period of growth with dense vegetation coverage across the site. The tree and vegetation coverage at that time was generally considered to be good and high in habitat units. As such, the baseline ecology position for the BNG assessment is high and achieving a biodiversity uplift as set out in the Environment Act through onsite measures alone will be difficult particularly as the site allocated for residential development.

- 6.32 To achieve meaningful biodiversity levels, there will need to be significant land available across the site for dense tree and vegetation planting to achieve a positive biodiversity figure, however, a potential reduction in land in favour of larger areas for biodiversity value in order to achieve BNG through on site measures alone will further conflict with the strategic aspirations to promote and utilise the site for housing. The requirement to incorporate more land to achieve BNG will reduce further the quantum of units. We consider that the proposed development strikes an appropriate balance of high quality homes with quality supporting features, such as the provision of communal open space, and landscaping and habitat features on site.

Viability of RC Frame

- 6.33 Allied to this, the provision of buildings above 5 storeys in height is not financially viable at the location. As previously discussed with officers, the provision of taller buildings has been discounted as buildings above five storeys in height require implementation of a more complex and costlier build method. Development proposals above five storeys in height would require the use of reinforced concrete frame construction (RC Frame) which is more costly than traditional build methods that are employed for lower rise buildings. Bellway Homes would need to deliver in the region of 600 units (far exceeding the indicative capacity) to make the scheme viable if RC Frame was used in the construction process. In addition, there are a number of other constraints that pose an adverse impact on the viability of the scheme and impact the use of RC Frame. For example, a large area of the site needs to be raised above the area at risk from flooding in accordance with the flood and drainage strategy. In addition, it is likely that a financial payment would be needed to deliver a positive Biodiversity Net Gain score through buying offsite credits to help supplement the proposed onsite biodiversity measures. All of these matters exacerbate the issues of using RC Frame. Further details of the viability issues associated with RC Frame is set out in the supporting Viability Assessment.

Ensuring residential quality

- 6.34 As shown throughout the pre-application discussions, and submitted Design and Access Statement, a higher level of density will create pressures on the ground floor layout and would lead to a further reduction in the size and quality of the communal amenity and a lower provision of dual aspect units. The earlier version of the scheme with a greater number of units included did not generate the levels of open space associated with the scheme hereby submitted. The proposed development includes 14,715 sqm of communal amenity space which represents 45.097% of the development's site area. This forms close compliance to Bexley's standard for communal open space as set out in its Design for Living SPG. To note, the provision of a destination feature in the form of a communal park/large open space was requested as part of the advice received from the South East Design Review Panel to assist in delivering a better quality development and improve the sense of place. The scheme also includes 66% dual aspect provision compared to 57% from the earlier versions. None of the single aspect units are north facing.
- 6.35 Ultimately, we do not consider that a prescriptive approach to unit numbers is appropriate in this case as there are a number of detailed considerations that effect the overall provision of units. The design has evolved through extensive discussions with planning and design officers at the Council and the GLA, and with members of the Design Review Panel, as well as the local community and key stakeholders. The emerging scheme reinforces the urban grid, provides new robust active frontages and provides a series of high quality open spaces that will ensure the development is a desirable place to live.

Establish a consistent building line along Yarnton Way to create a strong connection between the built form and the street with clear definition between public and private spaces

- 6.36 The scheme ensures a robust and consistent building line along Yarnton Way with principal frontages facing onto the main road. The buildings include 5 storey blocks which are interlinked by longer 4 storey elements. The treatment of these blocks will articulate the facades through demarking the base with the commercial units and through using darker materials on the recessed elements. The building line has also been set back further into the site from previous versions which provides greater separation from Yarnton Way and additional green defensible green space between the public and private space. The landscaping will assist in providing clear definition between these two spaces. The proposal includes a separate vehicular entry and exit point on Yarnton Way which will assist in the flow of movement across the site.

Establish a legible and permeable internal movement network with active frontages that connects to adjacent streets

- 6.37 The redevelopment of the site presents an opportunity to create a new sustainable neighbourhood that connects to the surrounding streets and reinforces the urban grid, provides new robust active frontages and provides a series of high quality open spaces to benefit both new and existing residents. As previously

mentioned, the proposed orientation and massing ensures legible routes through the site and facilitates a pedestrian and cycle connection through to Sutherland and Maida Road.

Create a green linear route through the site that provides a high quality environment for pedestrians

- 6.38 The proposed building massing and road networks improve the orientation of public open spaces and routes through the site for all users. The opening up of spaces between buildings allows for legible routes through the site. The proposals provide approximately 14,751 sqm of usable space (excluding private gardens). The larger area of communal open space is located at a part of the site that is highly visible and it will act as a point of interest from Yarnton Road to the north and Sutherland and Maida Road to the east. With regard to play provision, the emerging scheme delivers 2,405 sqm of play which is formed of a multi-generational nature play areas and various playable landscapes across the site. The current requirement based on the housing mix is 1,300 sqm and so the scheme delivers in excess of the play required by 1,105 sqm.
- 6.39 Various options have been considered in terms of safeguarding land within the site along which a future bus route could be extended through the development. Other options using for a new bus link have been considered, however, these would result in the loss of amenity space within the site and so would not be feasible. Instead, the current drawing shows how land on the inside of the 90 degrees bend along the access road could be safeguarded for future widening, if ever required. This would allow a one-way westbound bus route between Maida Road and Yarnton Way, noting that eastbound services could instead follow the route further west along Yarnton Way. The safeguarded land for future widening would also ensure that a car travelling in the opposite direction could comfortably pass a bus. The plan confirms that a bus could potentially be routed through the site, thereby allowing for any possible Bus Rapid Transit (BRT) link to be accommodated without significant amendments to the proposed road layout, and with no impact on the level of available amenity space within the site.
- 6.40 The proposals will include an area to the rear of the site for a habitat retention zone. This space measures approximately 2,200 sqm and is of a suitable size and design that will ensure retention of reptiles on site. In addition to this, adjacent to the habitat zone, the proposal will include a tiny forest. This is an area to the rear of the site that will be designed with species rich trees and shrubs to encourage and enhance biodiversity enhancements and urban greening. Due to the high baseline ecology position, it is likely that offsite credits will need to be secured in order to generate a positive biodiversity score.

Not preclude a public transport route through the site by establishing a street alignment that will enable a future bus-connection, connecting Yarnton Way with Maida Road

6.41 In line with the requirements of the site allocation, the safeguarding of land has been considered within the site to accommodate the provision of a future bus route to extend throughout the development. The proposal allows for land on the inside of the 90 degree bend along the access road to be safeguarded for future widening, if ever required. This would allow a one-way westbound bus route between Maida Road and Yarnton Way, noting that the eastbound service would follow a route further west along Yarnton Way. The safeguarding ensures that a car travelling against an oncoming bus, can comfortably pass. The proposal therefore allows a public transport route through the site which may enable a future bus-connection.

Introduce new, significant habitat on the southern part of the site, in order to restore its wildlife function, as well as allow for appropriate public access

6.42 The proposal incorporates a tiny forest to the south of the site, as well as a nature corridor which will both aid in restoring the sites wildlife function while also allowing for appropriate public access. The tiny forest will comprise of a dense, fast growing native woodland which is combined with an engagement programme to support community ownership. This will allow for integration between the sites wildlife function and the need for appropriate public access. The nature corridor will act as a wildlife buffer between the site and its surroundings. It will comprise of naturally regenerated scrub which is to be retained and enhanced to maintain a strong wildlife corridor.

Residential Considerations

Residential Mix

6.43 The National Planning Policy Framework recognises that to create sustainable, inclusive and diverse communities, a mix of housing based on demographic trends, market trends and the needs of different groups should be provided.

6.44 Policy SP2 of the Local Plan states that the Council's aspiration to achieve its strategic target of 50% affordable housing as a proportion of all qualifying provision across the borough over the plan period, by application of the threshold approach set out in Policy DP1. It also sets out that this should be achieved with an overall tenure mix of 70% low cost rented and 30% intermediate housing products and with a mix of housing types and sizes identified in the Bexley Strategic Housing Market Assessment (SHMA).

6.45 The SHMA for London Borough of Bexley was published in November 2021. The SHMA identified the dwelling type and size need by tenure for both the market and affordable sectors as follows:

Planning and Affordable Housing Statement

Southern Gas Network Belvedere Holders Stations, Yarnton Way, DA17 6JP



	Market	Affordable Rented	Affordable Intermediate	All tenures
1 Bedroom	5.7%	18.6%	12.8%	9.6%
2 Bedroom	32%	59.3%	42.7%	39.8%
3 Bedroom	41.1%	17.3%	34%	34.5%
4 Bedroom	21.2%	4.9%	10.5%	16.1%
Total	100%	100%	100%	100%

6.46 This scheme represents a significant improvement to that of the previous iterations brought before LBB. The proposed development incorporates a large quantity – 115 units / c. 30% – of family housing, as well as 10% affordable housing provision of which both respond positively to the needs of the Borough outlined within the SHMA. The scheme forms very close compliance to the all tenures mix set out above, particularly with regard to two and three bedroom homes.

6.47 The proposed housing mix within the proposed development is set out below at **Table 6.1**.

Table 6.1: Proposed Housing Mix

	Private	Affordable	Total	Total (%)
1 Bedroom	109	9	118	30%
2 Bedroom	145	15	160	40.7%
3 Bedroom	80	16	96	24.5%
4 Bedroom	18	0	18	4.6%
Total	352	40	392	100%

6.48 The proposal seeks to provide 392 houses in total comprising a mix of 1, 2, 3 and 4 bedroom dwellings in the form of houses, flats and maisonettes. The proposed unit mix has been determined through market characteristics, the target demographics of Belvedere, planning policy and having regard to the demand generated from Bellway’s Eastside Quarter development. The proposed scheme provides a mix of sizes to ensure a mixed and balanced community is created at this redundant part of Belvedere. In this regard, the proposals incorporate an appropriate amount of smaller units suitable for single people or couples, together with larger units suitable for both small and large families.

- 6.49 The proposed mix aligns itself closely with the 'all tenures' housing mix which seeks 30% 3 beds and 16% 4 beds. The proposed scheme includes 40.7% two bedroom dwellings, this aligns strongly with the 'all tenures' housing mix requirement at 40%. The proposals are in excess of the 1 bed requirement of 10%. However, the evidence that was used to inform the Local Plan (the Bexley SHMA 2021) does note that there is a marked shift towards a need for smaller dwellings and a reduced emphasis of houses in favour of flats (Paragraph 7.9). Hence the proposals have sought to deliver a slightly higher number of smaller flatted units. Therefore, despite the proposal not forming precisely to Bexley's unit mix requirement, we consider that the proposals respond well to the need for smaller housing whilst also providing a range of unit types (both flats and houses) and sizes including a greater proportion of family sized housing (at circa 30%) from previous iterations of the scheme.
- 6.50 It is considered that the mix proposed provides a broad range of housing types and sizes that has been designed following careful consideration of a range of criteria including the social characteristics of the locality, market demand, the requirements of the Council and the requirements of the potential affordable housing provider.
- 6.51 On the above basis it is considered that the proposals meet the policy criteria as set out in Policy SP2 of the Local Plan.

Density

- 6.52 At the national level, whilst the NPPF does not set out any prescriptive guidance with regards to residential density, it encourages new development proposals to optimise the capacity of sites in a manner that is compatible with the use, intensity, scale, character and grain of the surrounding area and the size of the site.
- 6.53 The overall density of the site is 113.3 dwellings per hectare based upon a site area of 3.46 hectares and the total number of units proposed as 392. This is considered to optimise the development potential of the site having regard to the aforementioned site and viability constraints whilst ensuring that it is in keeping with the site's surrounding context. As such the proposals accord with the Local Plan Policy SP2 and the Design Guide SPD (2006) and the density is considered appropriate.

Residential Quality

- 6.54 Policy D6 of the London Plan notes that in regard to private outdoor space, where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 square metres of private outdoor space should be provided for 1-2 person dwellings and an extra 1 square metre should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

- 6.55 Likewise, Table 3.2 of the London Plan 2021 identifies qualitative design aspects, which are sought to be addressed in new housing developments. Table 3.2 identifies considerations in regard to communal outdoor amenity space, which should seek to provide sufficient space to meet the requirements of the number of residents, be located to be appreciated from internal environments and to allow sufficient overlooking. Such spaces should also be designed to support an appropriate balance of informal social activity and play opportunities.
- 6.56 Policy S4 of the London Plan also notes that Development proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation and enable children and young people to be independently mobile. Residential developments should also incorporate good-quality, accessible play provision for all ages; at least 10 square metres of playspace should be provided per child.
- 6.57 Concerning private amenity space, all dwellings proposed will have access to external private amenity space, be this in the form of ground floor terraces or gardens or upper-floor private balconies. All private amenity space meets the requisite space requirements and the provision of amenity space immediately accessible to residents from their dwellings will provide residents with an overall greater level of residential amenity, contributing to a greater quality of life for residents. These private amenity areas allow alternative space for residents to use, should they not wish to utilise the large quantum of communal amenity space within the site.
- 6.58 In addition to the private amenity space provision, the proposed development will provide a significant quantum of public amenity space and play space, totalling 14,715 sqm and 2,405 sqm respectively. This is in addition to the proposed 1,305 sqm of private rear gardens.

- 6.59 The proposal delivers 45.097% of the site area as public amenity space, thus providing a landscaping led scheme. The provision of 45.097% is a material benefit to the scheme and aligns with the requirements set out in Bexley's Design for Living SPG which requires 45% of the plot area to be amenity space (within flatted developments). As the proposals comprise a mix of housing and flats, and given that the proposed development aligns with the requirement, we consider that this provision is appropriate and underpins the overall quality of the scheme. Furthermore, the proposed development provides a high quantum of play space across the site, in excess of the Mayor's standards. The GLA's Play space Calculator requires a total of 1,300 sqm of play space to be provided on site. The proposed development exceeds this by providing 2,405 sqm of play space across the site in the form of doorstep play, incidental wild play and communal space. This breakdown provides a range of play opportunities which cater to all ages from 0 – 12+ years. The play is distributed at a variety of locations across the site to ensure ease and accessible access for all users of the development. The Arboricultural Impact Assessment confirms that none of the proposed dwellings or private gardens are likely to be shaded by the off-site retained trees. Additionally, it is confirmed that the sizes and dispositions of the proposed private gardens will not be unduly shaded and will receive good levels of sunlight and daylight.
- 6.60 London Plan Policy D6 states that new residential development should as a minimum meet the minimum gross internal floor area requirements set out in Table 3.1, mirroring the Nationally Described Space Standards. The proposed development has been designed to be of high residential quality and has been developed in accordance with the Nationally Described Space Standards.
- 6.61 London Plan Policy D7 seeks to ensure suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children. Therefore to achieve this aim, Policy D7 stipulates that a minimum of 10% of all dwellings proposed must meet Building Regulations requirement M4(3) compatibility, to allow for wheelchair users. The remainder of dwellings must meet Building Regulation requirement M4(2) for accessible and adaptable dwellings. The proposed dwellings comply with this requirement, providing 353 (90%) to meet Part M4(2) standard and 39 (10%) as Part M4(3) standard. The wheelchair units are spread across the affordable and private units.
- 6.62 In further demonstration of quality, none of the flatted blocks exceed 8 units to a floor and all internal layouts are highly considered and, the scheme will deliver 66% dual aspect provision and will not include any single aspect north facing units. This is far in excess of the number of dual aspect units provided in the earlier iterations and therefore illustrates the high quality scheme submitted with the planning application.

Design Considerations

- 6.63 National, regional and local planning policy promotes high quality and inclusive design in new development. The NPPF makes it clear that the Government attaches great importance to the design of the built environment. As such, good design is considered to be a key aspect of sustainable development and is indivisible from good planning.
- 6.64 Paragraph 9 of the NPPF seeks to achieve sustainable development through positive improvements of the building environment, including replacing poor design with better design and improving the conditions in which people live, work, travel and take leisure. The 12 core principles set out at paragraph 17 of the NPPF include taking account of the different roles and character of different areas, and seeking to secure high quality design and a good standard of amenity for existing and future occupiers.
- 6.65 Policy SP5 of the Local Plan seeks to promote place making through a high enduring design quality that respect local distinctiveness and Policy DP11 of the Local Plan relates to achieving high-quality design and states that in seeking a high standard of design, setting out the design principles and requirements of character, landscaping, privacy (outlook and adverse impacts), quality of residential accommodation, crime and advertisements.
- 6.66 In terms of new residential development, the Local Plan states how Bexley is characterised by a number of specific features, of which, are worthy of protection and enhancement. It sets out the strategic and non-strategic policies to address how these characteristics will be preserved as well as how new developments are expected to achieve this.
- 6.67 SP5, placemaking through good design policy, in the Local plan, sets out that the design should respect the existing character and context but need not be constrained by what already exists; local character evolves over time. It also sets out that the Council will seek to ensure that;
- a) *All development within the borough is of high-quality design, contributes positively to the local environment, and protects the best elements of Bexley's character;*
 - b) *Design enhances social cohesion and health and wellbeing and considers the principles of inclusive and active design, in order to support good physical and mental health; and,*
 - c) *Design considers the relationships between building and spaces, including its contribution to and shaping of the public realm.*

- 6.68 Policy DP12 of the Local Plan states that areas in Lower Belvedere as defined by Figure 6 could rise up to 45 metres in height (roughly 15 storeys). Part 4 of Policy DP12 states that tall buildings should not have an unacceptable adverse impact on local character and not have an unacceptable adverse environmental impact. The site is identified as a potential location for a building of up to 15 storeys.
- 6.69 The design of the scheme has been developed following a detailed contextual analysis of the site and surrounding area, including analysis of its opportunities and constraints. Following this, the design has evolved as a result of extensive pre-application discussions with officers at the Council and GLA as well as engagement with local residents, Design South East and key stakeholders.
- 3.41 The proposed layout responds to the shape of the site and the adjoining characteristics of the surrounding area, which includes a busy dual carriage way to the north, a railway line to the south, low rise residential areas to the east, and large industrial units to the west. The central blocks sit on an east-west axis whilst the southern blocks sit on a north to south axis. The northern blocks provide a continuous building line to Yarnton Road which assists in defining the front of the site and responds to the requirements of the site allocation. The central blocks have been positioned to follow the adjoining grid layout of Sutherland and Maida Road, and designed so that the development reads as a continuation of the surrounding urban context, providing a sympathetic and contextual development.
- 3.42 The central and southern blocks provide a continuous frontage leading out from the side roads and are orientated to splay out from the communal amenity area to provide a generous and a larger area of communal amenity space in the centre part of the site. The large central amenity area was developed following guidance from the South East Design Review Panel. The Panel advised that the proposed development should provide for a destination feature for users of the development and the surrounding area to use the site.
- 3.43 Therefore, the proposed communal amenity area has been placed in direct sight from the existing properties on Sutherland and Maida Road, and is also visible from Yarnton Road thereby making it a highly visible feature of the development. The proposals place townhouses facing onto the large communal open space. These properties are set back from the amenity space to provide clear and open views to this area and to enhance the level of daylighting over the space. The placement of homes in this regard also assists in improving natural surveillance over the communal space. The proposed townhouses and blocks to the west of the site are all dual aspect units to ensure that blocks adjacent to the industrial estate are provided with better outlook. The series of townhouse to the east have generously sized gardens and are designed to act as a barrier to prevent excessive noise spill into the central part of the site from the adjoining industrial estate. The northern blocks provide a continuous building line along Yarnton Way, which is in accordance with the site allocation. This delivers a strong frontage to the development. The non-residential elements are placed in this part of the development to enhance activation on Yarnton Road. The non-residential units

enclose a central courtyard amenity area, which enhances the sense of place and will act as a further focal point and destination space for users of the development and surrounding area to meet in the new development.

- 6.70 The proposed development delivers a clear variety in heights across the development. This includes a mix of five storey finger blocks that are intersected by larger areas of open space. A four storey pavilion block sits adjacent to the entrance of Maida Road which acts as a transition block between the adjacent lower rise elements and the medium rise buildings on site. The central area includes the series of three storey townhouses that are provided with large back gardens and positioned around a large communal open area at the centre of the site.
- 6.71 The northern end of the site includes a series of 5 storey blocks that are interlinked by lower rise 4 storey elements. In addition, the northern section includes townhouses that are bookended by taller four storey blocks which help to provide a strong frontage at key public routes and corners within the development. The townhouses will be faced in a lighter brick whereas the flatted blocks will be designed with a darker red to assist in differentiating the architecture. The northern end will function differently from the rest of the site as is intended to become the community hub of the development will spill-out opportunities from the commercial unit. The location and design will continue to ensure access to the central area of Block B so that direct sight and light is received into the south facing courtyard.
- 6.72 The scheme will also deliver 66% dual aspect provision and will not include any single aspect north facing units.
- 6.73 A primary design objective throughout the design development has been to provide a considerable area of open space at the site. The proposals seek to deliver a high quality new residential neighbourhood which will provide a significant amount of new dwellings for the local area. The proposals are considered to be policy compliant with respect to layout, building heights and massing, and with regards to proposed materials and architectural character.

Landscaping, Trees and Amenity Space

- 6.74 Policy DP11 of the Local Plan states that there is a requirement towards privacy, outlook and adverse impacts. This sets out to;
- a) *Ensure that appropriate levels of privacy, outlook, natural daylight and other forms of amenity are provided.*
 - b) *Ensure existing properties' amenity is appropriately protected.*

c) *Ensure that all proposed development and uses do not unacceptably affect residents or occupiers of either the proposed development or of existing neighbourhood residents, businesses and community facilities by means of noise, odour, vibration and light spill or other disturbances.*

6.75 Policy DP1 in the Local Plan, sets out that *'Development proposals for new housing must achieve relevant London Plan space, accessibility, environmental, and housing amenity standards, having regard to published guidance'*. Referring to Policy D3, in the London Plan, it sets out that *'Developments should deliver appropriate outlook, privacy and amenity and provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity'*.

6.76 Similarly to this, Policy DP17 sets out that *'new open space provided as part of a development or existing open space that a new development can provide new or enhanced access to, should be inclusive and highly accessible to residents of the development and surrounding area.'*

6.77 Furthermore, Policy S4 of the London Plan requires at least 10sqm of play space to be provided per child. As such, the London Play space Calculator requires a total of 1,300 sqm of play space to be provided on site. The proposed development seeks to exceed this by providing 2,405 sqm of play space across the site in the form of doorstep play, incidental wild play and communal space. This breakdown provides a range of play opportunities which cater to all ages from 0 – 12+ years.

6.78 All of the proposed dwellings are provided with policy compliant public open space, and much of the accommodation is provided with private rear gardens. The dwellings are all located in close proximity to benefiting from communal public space and play space. The proposed landscaping strategy has been developed by Macfarlane + Associates and accompanies this application.

6.79 The proposed development is a landscape led scheme which has been designed to promote public realm and open space which is accessible and connected for all. The site also provides for biodiversity enhancements and an urban greening factor of 0.406. 45.097% (14,715 sqm) of the site is proposed to be public amenity space with an additional 1,305 sqm reserved as private rear gardens.

6.80 The objectives of the landscaping strategy are to integrate the scheme within its setting whilst creating new amenity space for the residents and an attractive public realm for all users to ensure in excess of the private amenity space. As such, the proposed development incorporates a nature corridor, pocket parks and a tiny forest into the scheme to maximise ecology on site. The site is split into three landscaping character areas; these are known as: Bosque Park, Green Central Spine and Green Skirt. Bosque park provides sheltered spill out space adjacent to the commercial floorspace with movable furniture and raised lawn to foster socialisation. The Central Green Spine allows for usable public green space with multi-generational play, swale plantings, seating opportunities and strong connections for pedestrian and cyclist

movement. The Green Skirt is a communal courtyard space for residents and the general public which offers doorstep play and break out areas. In addition, this character area includes the proposed tiny forest.

- 6.81 It is also proposed to incorporate 5,783 sqm of living roof across the site which will contribute to the overall biodiversity and habitat creation on site. The living roof will promote storm-water management, natural insulation of the building and a reduction in urban heat island effect while also improving air quality and wildlife. The proposed development will enhance biodiversity on site as far as possible through on site measures.
- 6.82 As noted above, the scheme includes 250 sqm of a tiny forest which is a dense, fast growing native woodland which is combined with an engagement programme to support community ownership. A tiny forest can include circa 600 trees planted densely in a tennis court sized plot which is capable of providing a biodiversity rich enhancement.
- 6.83 An Arboricultural Impact Assessment has been prepared by SJA Trees to support the application. The report states that the impacts of the proposal on the existing trees concludes that no trees of high landscape or biodiversity value are to be removed. The proposed removal of individuals and groups of trees will represent no alteration to the main arboricultural feature of the site with the proposed removal only resulting in the loss of those trees which are of low arboricultural value. The report concludes that the arboricultural impact of the scheme is of negligible magnitude and that the proposed development accords with national, regional and local planning policy.

Transportation and Highways

- 6.84 Chapter 9 of the NPPF considers transport related matters and places an emphasis on sustainable transport. Paragraph 110 sets out that in assessing sites for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

- 6.85 Paragraph 111 advises that development should only be refused on highways grounds if there would be unacceptable impacts on highway safety, or if cumulative impacts would be severe. In promoting sustainable transport, the NPPF (paragraph 112) encourages applications to prioritise pedestrian and cycle movements, facilitate access to higher quality public transport networks and provide facilities that encourage public transport use. Together with ensuring layouts create places that are safe, secure and attractive to minimise highway conflicts, address the needs of people with disabilities and reduced mobility, policy also seeks to allow for the efficient delivery of servicing and promotion of the use of green vehicles.
- 6.86 Policy DP22 of the Local Plan sets out that the Council will expect to see measures in all development proposals that facilitate and promote transport infrastructure. This includes transport infrastructure for walking, cycling, public transport services and shared mobility.

Access

- 6.87 The proposed site will be directly accessed via Yarnton Way at two points, one of which is already existing. Yarnton Way meets roundabouts at each end, giving access to the A2016 and Eastern Way approximately 580m to the north and access to the A2041 approximately 2km to the west. Yarnton Way is subject to a speed limit of 30mph with pedestrian footpaths along its length. As such an additional entry/exit point to the site will allow for easier access to the residents. The proposed main access will comprise an improved T-junction with the site access road as the minor arm. It will include an extended right-turn land formed within the central reserve of Yarnton Way. A capacity assessment has been undertaken by Ardent and is submitted within the Healthy Streets Transport Assessment.
- 6.88 Additionally to access from Yarnton Way, pedestrian and bicycle access will be reached from both Sutherland Road and Maida Road to the east of the site, provide the optimal walking distance to Belvedere station at around 240m. These routes allow a for a shorter route to Belvedere railway station and also to various amenities to the south of the site.
- 6.89 Around the site, both tree lined streets and shared surfaces will provide access for all residents around the site, by both vehicle, foot and bicycle.

Bus Rapid Transit Route

- 6.90 It is proposed to safeguard land in the south west corner of the site to allow for future widening of the internal road in order to accommodate the future possibility of a Bus Rapid Transit (BRT) route through the site. This would allow a one-way westbound bus route between Maida Road and Yarnton Way, noting that eastbound services could instead follow the route further west along Yarnton Way. The safeguarded land for future widening would also ensure that a car travelling in the opposite direction could comfortably pass



a bus. Ardent Drawing No. 194180-007A is submitted alongside this application which confirms that a bus could potentially be routed through the site, thereby allowing for any possible Bus Rapid Transit (BRT) link to be accommodated without significant amendments to the proposed road layout, and with no impact on the level of available amenity space within the site.

6.91 The proposed development does not preclude a public transport route through the site and is therefore in line with the requirements of site allocation BEL.05.

Car Parking

6.92 An assessment of the required parking provision in relation to the relevant local parking standards has been undertaken for both car parking and cycle parking provision. The proposed vehicular parking numbers have been calculated using the standards set out within Table 10.3 of the London Plan, which remain the relevant car parking standards. As such, the proposed parking provision has been provided following the guidance and the subsequent calculations are set out in Table 6.2 below.

Table 6.2: Southern Gas Network Belvedere Holders Stations Parking Requirements

Dwelling Type	Proposed Number of Dwellings	Policy Requirement per dwelling	Required Parking Provision
1-bed	117	0.75 spaces per dwelling	87.75
2-bed	161	0.75 spaces per dwelling	120.75
3-bed	96	1 space per dwelling	96
4-bed	18	1 space per dwelling	18
Total	392		322.5

6.93 As can be seen from the above table, there is a parking requirement at the site of up to 322.5 parking spaces. The scheme is seeking to provide 157 spaces which is in line with the maximum TfL standards and should therefore be acceptable, considering that national and local policy is seeking to see a shift towards non-car modes.

6.94 Within the London Plan, Table 10.3 stipulates maximum standards for Outer London sites with a PTAL of 3. The maximum allowable provision is 0.75 spaces per 1-2 bed dwelling, and up to 1 space per 3+ bed dwelling. In light of this, based on the current indicative mix (278 1 or 2 bed and 114 3+ bed) the development should provide a maximum of 322 spaces. It should be reiterated that these standards are maxima and the London Plan advocates developments that are well connected to public transport, such as this, to be 'car-lite'.

6.95 Additionally, the supporting Healthy Streets Transport Assessment prepared by Ardent includes a review of any off-site improvements to improve existing non-vehicular routes to key destinations in the area. Thus,

encouraging residents to travel by non-car modes which in turn results in lower car ownership levels. A Travel Plan is also provided as part of the application which will further support a lower provision as it will help promote sustainable choices to residents.

- 6.96 With regards to electric vehicle parking, the current Local Plan sets out that *'development proposals should incorporate where appropriate the below points at an early design or pre-application stage, provide electric vehicle charging infrastructure in line with London Plan minimum standards, to be made publicly aware where possible.'*
- 6.97 It is also proposed to include a car club parking spaces on site, however it is envisaged that this could be secured as part of the S106 agreement.

Cycle Parking

- 6.98 It is proposed to provide 728 long stay cycle parking spaces and 17 spaces for visitors. The proposed cycle parking numbers have been calculated using the standards set out in Table 10.2 of the London Plan. Therefore, the scheme is required to provide a total of 745 spaces, inclusive of 728 residential spaces and 17 visitor spaces.
- 6.99 The provision of 740 spaces therefore exceeds the local cycle parking standards and actively promotes sustainable travel in accordance with the national and local planning policy requirements. The proposed cycle stores are provided at a variety of locations across the development with 577 spaces to be provided within secure communal cycle stores within each flat block. The remaining 150 spaces are associated with the 75 houses.
- 6.100 Of the 577 cycle spaces associated with the flats, 29 spaces will be accessible bays, 115 will be provided as Sheffield stands and the remaining 433 spaces in the form of two-tier stands.

Refuse and Servicing

- 6.101 Policy SP12 (Sustainable Waste Management) of the Local Plan document advises that the Council will ensure that waste is managed in ways that protect human health and the environment. This will be supported through the adequate provision for the storage and recycling of waste being integrated into design proposals.
- 6.102 Policy DP26, in the Local Plan, sets out the requirements for waste management for residential development proposals stating that within development proposals there is;

- a) *Adequate space within each flat/apartment for the temporary storage of waste generated by that flat/apartment allowing for the separate storage of recyclable materials;*

- b) Adequate communal storage for waste, including separate recyclables, pending its collection;*
- c) Storage and collection systems (e.g. dedicated rooms, storage areas and chutes or underground waste collection systems) for waste are of high-quality design and are incorporated in a manner which will ensure there is adequate and convenient access for all residents and waste collection operatives and will contribute to the achievement of London Plan waste management targets;*
- d) Measures are incorporated to manage, to acceptable levels, impacts on amenity including those that may be caused by odour, noise, and dust;*
- e) The on-site treatment of waste has been considered and any system to be incorporated will take into account the factors listed above and other relevant Development Plan policies; and;*
- f) Adequate contingency measures are in place to manage any mechanical breakdowns.*

6.103 As well as this, Policy DP26, sets out that proposals for new developments should be accompanied by a recycling and waste management strategy which considers the above matters, to meet the local authority waste management recycling targets.

6.104 A Site Waste Management Plan has been prepared by Ardent to demonstrate that the proposed development is in accordance with Policy DP26 and meets LBB's waste management targets.

Energy and Sustainability

6.105 The NPPF encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change.

6.106 At local level, Policy SP14 (Mitigating and adapting to climate change), sets out that the Council will actively pursue the delivery of sustainable development through certain provisions. These include supporting developments that achieve zero-carbon and demonstrate a commitment to drive down greenhouse gas emissions to net zero; administer the borough's carbon offset fund; investigate opportunities for the funding and development of decentralised energy networks in the borough; support new and enhanced green infrastructure; support integrated water management through a coordinated and holistic approach to land and water management; directing new development into the most sustainable locations by applying the flood risk sequential test across the borough; following the sequential approach to flood risk management advocated in national planning policy; working with the EA and others to ensure the recommendations of the TE2100 Plan are implemented; and; supporting the protection of key infrastructure assets from the risks of flooding.

6.107 A Sustainability Statement has been prepared by Hodkinsons to demonstrate that the proposed developed is considered to be sustainable, as measured against relevant local, regional and national planning policy. The key sustainability credentials are as follows:

- A full BREEAM Pre-Assessment accompanies the application and shows that the predicted score at this stage is 56.66% - 'very good', representing a high level of sustainable design and construction.
- The proposed development will deliver a 98% reduction in overall CO₂ emissions over the Part L 2021 baseline through energy efficiency measures such as connecting to an existing heat network and solar PV.
- The scheme has been designed to ensure overheating risk is reduced to acceptable levels in accordance with CIBSE TM59:2017 requirements.
- Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum internal daily water consumption of 105 litres/person/day.
- Adequate facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
- The principles of a circular economy shall be incorporated into the development, where possible.
- Where practical, new building materials will be sourced locally to reduce transportation pollution and support the local economy. New materials will be selected based on their environmental impact and responsible suppliers will be used where possible.
- Acceptable air and noise quality levels will be achieved on site with proper mitigation measures.
- The proposed development site lies in a high flood risk zone but will benefit from flood defences and SuDs such as ponds, attenuation tanks, permeable paving.
- The dwellings are to target an improvement on Building Regulations Part E through party walls and floors.
- 90% of the new dwellings will be designed to meet Building Regulations Approved Document M4(2) and 10% will meet Part M4(3).
- The site will benefit from close proximity to the Belvedere railways station and sustainable modes will be encouraged through the provision of 740 cycle storage spaces.
- Enhancements will be implemented through the provision of landscaped areas, a 'Tiny Forest' and additional tree and shrub planting across the site.
- The site will aim to achieve a Very Good score with the Considerate Constructors Scheme and will closely monitor construction site impacts.
- The site benefits from access to a good existing public transport network and sustainable modes will be encouraged through the provision of cycle storage spaces and electric vehicle charging points.
- Biodiversity and ecological enhancements will be implemented through the provision of landscaped areas, and additional tree and shrub planting across the site.

6.108 An Energy Statement has also been prepared by Hodkinsons which assess the proposed development against the London Plan energy hierarchy: Be Lean, Be Clean, Be Green and Be Seen. As such, a range of Be Lean energy efficiency measures are proposed which will allow the development to achieve a 15% reduction in site wide regulated CO₂ emissions, with a 15% reduction for the residential portion of the development and a 18% reduction for the non-residential development over a Part L 2021 baseline, meeting London Plan requirements.

- 6.109 In line with the Be Clean stage, a connection to an existing heat network is proposed, providing a further site wide CO₂ reduction of 82%.
- 6.110 A range of Be Green renewable energy technologies have been considered, as such suitable roof space will be utilised to provide approximately 388 kWp of solar PV.
- 6.111 Therefore, the combination of the above will provide for an overall 98% reduction over the Part L 2021 baseline, which complies with London Plan Policy SI2.

Noise and Vibration

- 6.112 Paragraph 174 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by:

a) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

- 6.113 Paragraph 185 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

- 6.114 Policy DP11 (Achieving high-quality design), under the Local Plan, sets out the policy implementation and notes that *'Identified impacts should be mitigated through design. The layout, orientation, design and use of buildings will ensure that operational noise does not adversely affect occupants or neighbours, particularly noise-sensitive land uses such as housing. Where necessary, development is required to robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures'*.

- 6.115 Ardent has been instructed to prepare the Noise Assessment which accompanies the planning application.

- 6.116 Based on the measured sound levels at the site, façades in close proximity to Yarnton Way and the railway line are considered to be medium to high risk, all other façades would be considered low to medium risk in accordance with ProPG guidance.
- 6.117 The measured vibration levels are significantly below a low probability of adverse comment during the day. At night vibration levels are within the range of low probability of adverse comment in the z axis, for the x and y axes, the levels are significantly below this range. Careful consideration will need to be given to the structural design of buildings closest to the railway line at the detailed design stage of the site to reduce vibration transfer.
- 6.118 The assessment identifies some mitigation measures which will aid the provision of suitable levels of attenuation to achieve the required internal sound levels based on the predicted noise levels, therefore demonstrating the suitability of the site for residential development.
- 6.119 Closed windows and alternative will be provided to allows residents the choice to close windows, whilst achieving suitable background ventilation and internal noise levels. Windows are not sealed shut and residents will have a choice to open windows for ventilation whilst noting slightly elevated internal sound levels.
- 6.120 The risk of noise impact under overheating conditions within properties has been considered in accordance with AVO Guidance. Areas of the site in close proximity to Yarnton Way and the railway line are considered to be medium to high risk, all other areas of the site would be considered low risk. The strategy to provide thermal comfort and suitable internal noise levels will be developed further as part of the detailed design of the proposed development.
- 6.121 In light of the above, it is concluded that the proposed development should not raise any residual significant or other adverse impacts on the health and / or quality of life for existing neighbouring dwellings in the vicinity of the site, or dwellings to be created by the development. It is therefore concluded that the proposed development fully complies with the relevant noise-related national and local planning policy documents.

Flood Risk and Drainage

- 6.122 Paragraph 159 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 167). Paragraph 167 sets out that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

- 6.123 Policy DP29 (Water quality, supply and treatment), in the Local Plan, sets out that development proposals should not adversely affect the quality or quantity of water in watercourses or groundwater, where new developments will be required to protect and/or enhance the water quality of existing water resources, such as watercourses and groundwater.
- 6.124 The Environment Agency's flood maps indicate that the site is located in a high risk (Flood Zone 3) area.
- 6.125 The submitted Flood Risk Assessment and Drainage Strategy prepared by Ardent notes that a 40% allowance for climate change is applied to the development to allow for sufficient storage volume for the 1 in 100-year storm event.
- 6.126 The FRA concludes that the site would not be at risk of flooding or increase the flood risk to others as a result of the proposed development. As set out in the supporting FRA, the proposed development will raise the ground up at the southern end of the site above the area at risk of flooding. The proposed development will raise the ground and sleeping accommodation to a minimum of 2.79m AOD which is above the AOD level at risk of flooding of 2.49m AOD, plus incorporating a 300mm freeboard level for additional mitigation. In addition, none of the apartments propose sleeping accommodation at ground floor level.
- 6.127 The proposals are therefore consistent with the aims of the NPPF, as well as in accordance with relevant local planning policy with regards to flood risk and drainage.

Ecology

- 6.128 Paragraphs 179 - 182 of the NPPF sets out how planning decisions can conserve, protect and enhance habitats and biodiversity. Planning decisions should protect and enhance valued sites of biodiversity value and recognise the wider benefits from natural capital and ecosystem services. Opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 6.129 At the local level, Policy DP20 of the Local Plan requires developments to conserve, enhance and, where appropriate, restore biodiversity and geodiversity. As of November 2023, major developments are required to provide a biodiversity net gain of 10% on site. In accordance with the Site Allocation a BNG assessment has been carried out. This has been undertaken at the sites baseline position. The baseline ecology position was taken 30th January 2020. This is the date prescribed by the Environment Act which requires that any assessment taken beyond this date needs planning permission or robust justification. In this case, the site is regularly cleared as works are undertaken to facilitate maintenance of the gasholders previously on site. However, on the 30th of January 2020, the site was in a period of growth with dense vegetation coverage across the site. The tree and vegetation coverage at that time was generally considered to be good and high in habitat units. As such, the baseline ecology position for the BNG assessment is high and

achieving a biodiversity uplift as set out in the Environment Act through onsite measures alone will be difficult particularly as the site allocated for residential development.

- 6.130 The proposed development has to respond to a number of requirements, one of which is the need to deliver meaningful amount of new housing towards Bexley's annual housing requirement and to respond to the housing requirement of 465 homes set out in the site allocation.. The site is also a surplus former utility site and therefore planning policy across all levels supports the delivery of substantial new housing. Conversely to achieve meaningful biodiversity levels, there will need to be significant land available across the site for dense tree and vegetation planting to achieve a positive biodiversity figure, however, a potential reduction in land in favour of larger areas for biodiversity value in order to achieve BNG through on site measures alone will further conflict with the strategic aspirations to promote and utilise the site for housing. The housing proposals are already below that required within the site allocation, and a further requirement to incorporate more land to achieve BNG will reduce further quantum of units further. We consider that the proposed development therefore strikes an appropriate balance of high quality homes with quality supporting features such as the provision of communal open space, and landscaping and habitat features on site.
- 6.131 Therefore, through onsite measures alone it is expected that the redevelopment of the site will generate a deficit in habitat units when compared to the baseline position. This will not be the case if the baseline position was considered at the date the planning application is submitted. It should be noted that the site is largely cleared in order to facilitate continued maintenance of the underground gas pipes and removal of the second gasholder.
- 6.132 Notwithstanding this, the proposed ecological and landscape features proposed across the emerging development will be substantial and will enhance biodiversity as much as possible. The proposed development will include an area to the rear of the site for a habitat retention zone. This space measures approximately 2,200 sqm and is of a suitable size and design that will ensure retention of reptiles on site. In addition to this, adjacent to the habitat zone, the proposal will include a tiny forest. This is an area to the rear of the site that will be designed with species rich trees and shrubs to encourage and enhance biodiversity enhancements and urban greening.
- 6.133 The application is accompanied by a Preliminary Ecological Appraisal prepared by Phlorum, which assessed the potential ecological constraints of development at the site. The appraisal included a number of site surveys which informed its conclusion which states, as long as the report's recommendations are followed, and the reptile fencing remains in place, no further reptile surveys are recommended. The appraisal also confirms that a precautionary approach to site clearance respect to breeding birds, water voles, hedgehogs and stag beetles is recommended to minimise any adverse impacts on these species' groups. Finally, it has been recommended that the site is enhanced by introducing some compensatory

planting and installing bat and bird boxes. The proposed landscaping scheme has been informed by such and is considered to satisfy the requirements of the Preliminary Ecological Appraisal.

Contamination

- 6.134 Paragraph 178 of the NPPF encourages sites to be suitable for its proposed use by taking into account ground conditions and any risks arising from contamination.
- 6.135 At the local level, Policy DP28 of the Local Plan states that where development is proposed on contaminated land or potentially contaminated land, a desktop study and site investigation, including appropriate proposals for remediation
- 6.136 Given the previous use of the subject site, it is necessary to consider the potential for land contamination and therefore a Risk Assessment & Method Statement has been undertaken by Idom. The objective of the assessment is to obtain information on ground conditions and the presence of contamination at the site. The assessment further confirms that no excavations will deliberately puncture any surface drums or other potentially contained sources of contamination. Additionally, it is noted that any operatives who will be in close proximity to contaminants will be provided with suitable PPE.
- 6.137 It is considered that should any further information or assessments be required, these can be controlled via a suitably worded planning condition to ensure that the such works (if required) can be undertaken prior to occupation.

Planning Obligations

- 6.138 Regulation 122 (2) of the Community Infrastructure Levy Regulations states that: *“A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –*
- a) necessary to make the development acceptable in planning terms;*
 - b) directly related to the development; and*
 - c) fairly and reasonably related in scale and kind to the development.”*
- 6.139 Paragraph 54 of the NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

Draft Heads of Terms

6.140 In addition to the wide range of planning benefits that the proposed development will deliver, it is anticipated that an appropriate package of Section 106 obligations and contributions will be negotiated and agreed with the Council in accordance with the statutory tests contained at paragraph 56 of the NPPF and Regulation 122 of the CIL Regulations, and the overall viability of the proposals.

6.141 At this stage it is anticipated that the Heads of Terms could comprise:

- Affordable Housing;
- Transport;
- Future Management and Maintenance of through routes through the site;
- Onsite affordable housing and review mechanisms;
- Measures to enhance BNG either through credits or via a donor site (to be discussed further with the LPA);
- Car Club Space;
- Travel Plan; and
- Carbon offset payment.

6.142 Exact amounts payable would be subject to viability. If any additional site specific obligations directly related to the development are identified as being required to make the application acceptable in planning terms, we would expect to agree these with officers subject to viability and compliance with the tests outlined above.

Community Infrastructure Levy

6.143 At a local level, LBB's adopted charging schedule originally came into effect from April 2015. The site is located within CIL Zone 1, where the chargeable rate for new residential development is £40 per sqm.

6.144 CIL is to be calculated in accordance with Regulation 40 of The CIL Regulations 2010 (as amended) which in summary is payable on the proposed uplift in floorspace (GIA). Social Housing Relief will be applicable to the proposed affordable housing.

6.145 The relevant CIL forms have been completed and have been submitted as part of the planning application for the proposed development.

Planning Balance

6.146 In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is not the case that if an application is contrary to one policy or provision within the development plan it ought to be refused solely on that basis. It is instead the case that the decision-taker must weigh up all of the benefits and harm resulting from a proposal, with reference to all the relevant policies of the development plan, and then come to a balanced view on whether planning permission should be granted or refused.

6.147 Consideration needs to be given to whether the material considerations associated with the proposal are sufficient to outweigh the identified policy conflict. It is accepted that there are harms associated with the proposed development, namely the provision of non-policy compliant affordable housing and car parking, as well as deviances from the site allocation criteria including the provision of less units on site than the allocation allows for. As such, the benefits of the proposed development represent important material considerations which weigh heavily in favour of the application. These include:

- Regeneration of a major, vacant former utility site to provide a high quality residential scheme providing a meaningful amount of new homes in accordance with the sites allocation;
- Removal of the existing poor quality former industrial site which will enhance the visual appearance and safety of the site through the provision of a design-led scheme which has been developed through detailed pre-application discussions with officers at LBB, GLA, Design South East Design Panel, and other key stakeholders. The development will improve the built environment and local townscape providing a carefully considered series of new buildings which will enhance this part of Belvedere with a new residential neighbourhood and will include new usable public realm for existing and new residents;
- The design-led approach for the redevelopment of the site has resulted in a high quality scheme that includes material benefits of 14,751 sqm amount of open space, 2,405 sqm of child play space (in excess of the GLA's requirements), 115 family unit provision (29% of the total number of units) and 66% dual aspect provision;
- Delivery of 392 much-needed new homes, including 10% affordable housing provision delivered all as London Affordable Rent and a mix of residential dwelling types and sizes, creating a mixed and balanced sustainable community;
- Delivery of high quality new homes which meet accessibility and internal space standards (within the new buildings); provide high levels of amenity and comfortable living environments;
- The development will deliver a series of new publicly accessible open green spaces across the site which will provide a high quality green setting, enhance urban greening and provide a number of focal points for future residents to enjoy and relax in the new development;

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- The development will provide a tiny-forest scheme with a range of new semi-mature and densely planted trees and species rich planting, the development will also include a habitat retention zone and will seek to enhance biodiversity as far as possible through the use of on-site measures; and
- Financial benefits for the local economy, including creation of new jobs during the construction phase of the development, new local spend from residents moving into the development, CIL and S106 contributions.

6.148 These benefits are significant and should be afforded significant to very substantial weight in the balancing exercise. Overall, the potential impacts of the scheme have been assessed and it is concluded that the identified technical policy harm is very limited, particularly in the context of the scheme's benefits. The planning balance is thus considered to be strongly in favour of this viable and deliverable proposal being granted planning permission.

7. Conclusions

7.1. This Planning and Affordable Housing Statement has been prepared in support of an application for full planning permission submitted to the London Borough of Bexley by Bellway London Partnerships (the applicant) for the proposed development at the Former SGN Gas Holder Site, Belvedere, Bexley, DA17 6JR.

7.2. This application seeks full planning permission for the following:

Redevelopment of the site to provide residential units including affordable housing (Use Class C3) and commercial floorspace (Class E) in new buildings ranging between 3 to 5 storeys in height, together with associated car parking and cycle storage, landscaping including new areas of public open space and a reptile retention zone, associated infrastructure including new junctions off Yarnton Way, drainage and land raising.

7.3. The applicant is seeking the comprehensive redevelopment of the site to provide high quality residential-led development in a design-led manner which makes effective use of the site, addresses the sites allocation and will bring forward much needed housing for the Borough.

7.4. The proposal has been formulated following extensive pre-application discussions with LBB, key stakeholders and the general public. This statement has assessed the material considerations of the proposal against the prevailing planning policy framework for the site. The proposed redevelopment of the site is in line with the development plan policy and the sites allocation (BEL05 Belvedere Gas Holders).

7.5. The proposed development represents an opportunity to deliver new homes to address the sites allocation in a highly sustainable location. The proposal provides an appropriate level of affordable housing together with a mix of units that broadly complies with LBB guidance and responds to the identified needs of the Borough. Additionally, it is concluded that the potential harm identified is limited and does not outweigh the benefits in favour of developing the proposed development. Accordingly, the scheme constitutes sustainable development and that the planning balance is strongly in favour of the proposal being granted planning permission.

7.6. In summary, it is therefore concluded that there are significant benefits to the application which are considered to outweigh any potential harm that may arise from the proposed development. It is respectfully requested that the application should be approved without delay.