

Planning, Design & Access Statement

28 Blenheim Drive, Welling,
DA16 3LY

Conversion of existing dwelling to provide 2 self-contained dwellings.

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Planning Property Services

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1 Introduction

1.1 Full planning permission is sought for the conversion of the existing property to provide 2 self-contained flats at 28 Blenheim Drive, Welling, DA16 3LY. (hereafter referred to as 'the Site'). The Site is located within the administrative boundary of the London Borough of Bexley.

1.2 This appraisal proceeds on the following basis:

- Section 2 sets out the site and its surroundings:
- Section 3 identifies the sites planning history:
- Section 4 briefly sets out the development proposals for the land:
- Section 5 identifies relevant planning policy:
- Section 6 provides an initial assessment of the proposals against the relevant physical and planning constraints:
- Section 7 provides Conclusions.

1.3 The report proceeds to identify the relevant constraints and opportunities of the site, before assessing these against relevant planning policy and guidance. The report shows that the proposals will make the most effective use of the site and land by providing 2 high quality dwellings which meet all relevant policies and guidance. The proposals will not have any detrimental impact upon neighbouring amenity or highway safety, and will positively contribute toward the Council meeting its identified housing needs.

1.4 On the basis of the information submitted with this application we respectfully ask that planning permission be granted without delay.

2 Application Site and Surroundings

2.1 The site is brownfield land, comprising a detached dwellinghouse located at the northern end of Blenheim Drive. A site location plan with the application site outlined in red is provided below for reference:



Figure 1 - Site Location Plan (site outlined in Red)

2.2 The site occupies a corner plot which is significantly wider than all the other plots within the vicinity, as clearly shown by the above plan. To the rear of the property is an access road leading to a newly developed housing scheme.



Figure 2 - Street view of 28 Blenheim Drive

2.3 The existing property benefits from off street parking and a generous side and rear garden. As a detached property direct access is provided to the rear garden via a side gate and alleyway.

2.4 The site is shown to be at low risk of flooding of any type (Flood Zone 1), it is not listed or considered to have any particular heritage significance. The application site has a PTAL level of 1b. Local bus services are available via Edison Road just 4 minutes away, and Welling Train Station is an 8-minute journey via bus or a 15-minute walk.

3 Planning History

3.1 The application site has the following planning history relevant to the proposals:

App Ref	Description	Validation Date	Status
13/00607/FUL	<u>Single storey rear extension. Two storey side extension. Single storey front extension. Alteration to roofline to raise existing roof.</u>	11 th April 2013	Refused 15 th July 2013.
13/01885/FUL	<u>Single storey side and rear extension, single storey front extension and alterations to raise the height of existing roofline.</u>	11 th November 2013	Approved 6 th January 2014

3.2 The permission of 2013 was implemented and represents the existing dwelling house and application site.

4 The Proposals

- 4.1 The application proposes to divide the existing single dwellinghouse to provide 2 self-contained flats. No external alterations are proposed with the exception of a door to be inserted into the rear elevation of the property at ground floor level to facilitate direct access to the rear garden.
- 4.2 The conversion of the property provides a 1 bedroom 1 person ground floor unit of 43.9sqm and a 2 storey 1 bedroom 2 person unit of 64sqm. Both units meet all the standards set by the National Technical Housing Standards, including minimum room sizes, internal storage provision and overall floorspace requirements.
- 4.3 Both of the proposed flats are dual aspect and have their own private dedicated external amenity space. The ground floor unit is provided with space to the side and rear of the property totalling around 50sqm, and the 2-storey unit has a rear garden of around 42sqm. Both spaces afford the users private external amenity space, benefitting from boundary screening that prevents overlooking from the public realm and neighbouring properties.
- 4.4 The existing dwelling benefits from off street parking, provided by a dropped kerb in front of the property. The proposals include the provision of an additional off street parking space, ensuring that each of the proposed dwellings has 1 dedicated parking space. An additional dropped kerb is proposed to facilitate access to the additional parking space.
- 4.5 Refuse and recycling is to be stored within each dwelling, and also within their respective private gardens until collection day where refuse will be moved onto the street for collection. Extracts of the proposed drawings are provided overleaf showing the proposed layout of the 2 flats:

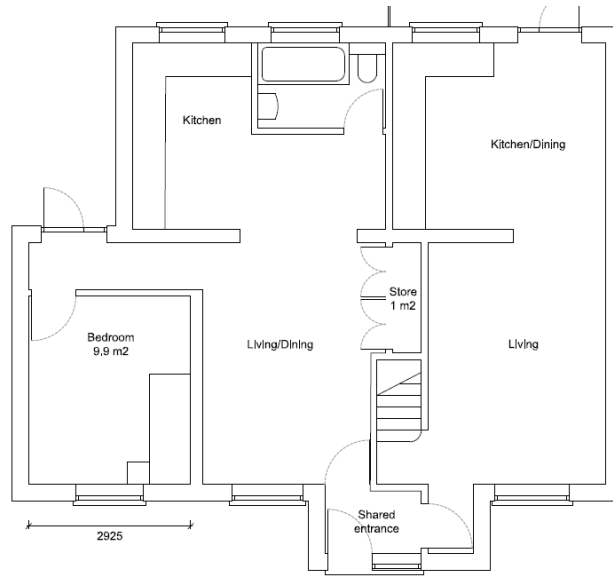


Figure 3 - Proposed Ground Floor

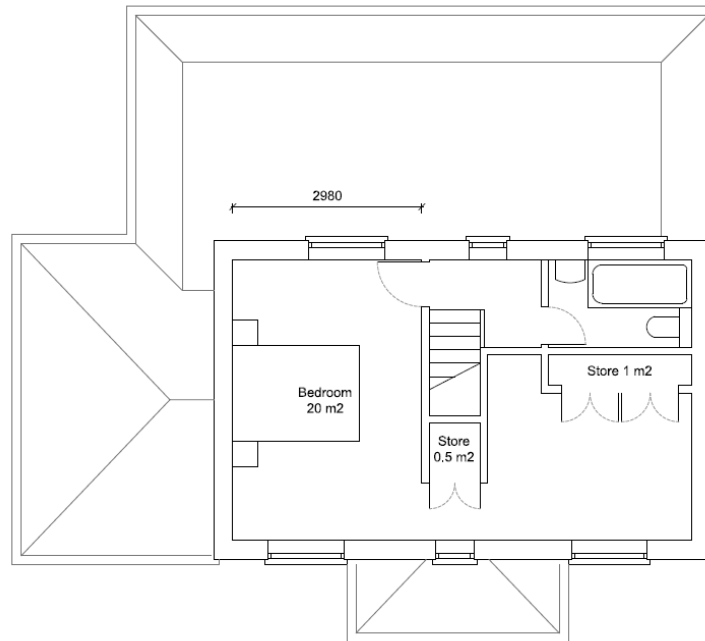


Figure 4 - Proposed First Floor

5 Planning Policy Context

5.1 The UK Planning System has a plan-led approach. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that:

5.2 “If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

5.3 The adopted Development Plan for the London Borough of Bromley is made up of:

- The Bexley Local Plan 2023
- The London Plan 2021

Bexley Local Plan

5.4 The adopted Bexley Local Plan Proposals Map 2023 shows the site to be within a “Primarily Residential Area.” It is also around 100m from the northern boundary of Welling, which is designated by the plan as a “Sustainable Development location.”

5.5 Policy SP1 Achieving Sustainable Development advises that the main focus of housing will be within the sustainable development location identified on the proposals map – which the application site is under 100m from. Part 4 of the policy advises that development proposals outside of these areas will be supported where they fully demonstrate compliance with all relevant Development Plan Policies.

5.6 Policy SP2 Meeting Bexley’s housing requirements states that Bexley will seek to meet the Mayors 10-year housing target of 6850 new homes – i.e. 685 new dwellings per annum. This is a significant uplift on recent housing delivery rates which averaged 459 per year based on the 2021 Housing Delivery Test results.

5.7 Policy SP2 advises that the Council will provide a choice of living styles that appeals across generations, and that new homes should be provided that are available to a range of incomes and sizes. To achieve this, they will seek to deliver a balance between family and other types and sizes of housing and encourage sensitive residential intensification – permitting these in those outside of the sustainable development locations where they are demonstrated to comply with all development plan policies.

5.8 Policy DP1 Providing a supply of housing states that development proposals for new housing must make the most effective and efficient use of land, seeking to achieve higher densities in the most

accessible locations. They must also be well designed, appropriate for the area, high quality and be sustainable.

5.9 Policy DP2 Residential Development on back land and infill sites, notwithstanding its title, states that proposals for new dwellings on small brownfield sites....will generally be permitted in all locations. They will be supported in particular where the development capacity of the site is optimised, and the development provides well designed housing with a high standard of amenity that makes a positive contribution to the area.

5.10 Policy DP6 Loss of existing housing in para 2.69 highlights the important contribution that conversions will make to meeting the boroughs housing need.

5.11 Policy DP11 Achieving High Quality design advises that proposals within Primarily Residential Areas must seek to protect or enhance the areas character and amenities. Parts f and g outline the requirements for the delivery of high-quality residential accommodation.

London Plan

5.12 The London Plan was adopted in 2021 and sets out the Spatial Development Strategy for Greater London. The Plan is the statutory development plan for London, meaning that the policies set out should inform planning applications in London. Local Plans should also have broad conformity with the London Plan.

5.13 London Plan Policy GG2 Making the best use of land states “that to create sustainable mixed-use places that make the best use of land, those involved in planning must enable the development of brownfield land.”

5.14 The London Plan encourages the development of small sites through Policy H2 stating that boroughs should pro-actively support well-designed new homes on small sites to help contribute to London’s housing needs.

5.15 London Plan Policy D3 Optimising site capacity through a design led approach states that “all development must make the best use of land by following a design led approach that optimizes the capacity of sites.”

National Planning Policy Framework (NPPF) and other guidance

5.16 The National Planning Policy Framework (NPPF) is the principal planning document, for which all development in the UK must have regard to. A revised version of the NPPF was published by the government in September 2023, superseding previous versions published in 2012, 2019 and 2021.

- 5.17 Paragraph 11 of the NPPF states that plans, and decisions should apply a presumption in favour of sustainable development.
- 5.18 Section 4 of the NPPF is titled 'Decision-making', and paragraph 38 states that local planning authorities should approach decisions on proposed development in a positive and creative way.
- 5.19 Section 11 of the NPPF relates to Making effective use of land.
- 5.20 Paragraph 119 states, "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land".
- 5.21 Section 12 of the NPPF, 'Achieving well-designed places' states in paragraph 126 that, "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

6 Planning Assessment

6.1 This section proceeds to assess the proposals against the relevant policies of the Bexley Local Plan, the London Plan and the NPPF as relevant. It starts with the principle of development followed by more detailed considerations.

Principle of Development

6.2 Adopted policies of the Bexley Local Plan and the London Plan clearly support the principle of development for the proposals. Policy SP2 meeting Bexley's Housing requirements identifies the boroughs housing needs, and Policy SP1 states that development proposals outside of the sustainable development locations will be supported where it meets the other policies of the adopted plan.

6.3 In order to meet its housing targets policy SP2 notes that this will include providing a range of sizes and types of dwelling to meet the various needs of its residents. The policy actively encourages the sensitive intensification of existing residential sites to achieve this. The proposed conversion of the property to intensify its use that makes the most effective use of the site whilst meeting all adopted policies resonates strongly with these key policy objectives. The proposals will help to meet both the overall delivery targets as well as the objective to provide a more diverse range of housing in the local area.

6.4 The most recent Housing Delivery Test (HDT) results published by central government for 2021 showed Bexley to deliver 93% of its housing target over the previous 3 years. We note this delivery averaged 459 dwellings per annum which is significantly below the requirement now set by the London Plan of 685 dwellings per annum. The 93% score in the HDT results required the LPA to prepare an Action Plan to ensure improvements to future delivery rates.

6.5 The Council's 5 year Housing Land Supply (HLS) Statement of 2022 provides details on the Council's HLS and how this will meet the requirements set by the London Plan. It includes the allowance of 17% of this target to be met by windfall sites including conversions of existing buildings and properties. Proposals such as this application are thereby recognised as cumulatively playing an important role in the Council meeting its identified housing needs.

6.6 Bexley Local Plan Policy DP1 adds further support by requiring housing development to make the most effective use of land, and that they should maximise densities of development. This support is echoed by the London Plan Policy H2 Small Sites which advises that boroughs should pro-actively support well-designed new homes on small sites to help contribute to London's housing needs. London Plan Policy D3 goes further by adding that site capacity should be optimised following a design led approach.

6.7 The application site is within an area shown by the Bexley Local Plan to be of residential character, and the proposals seek to make the most effective use of a brown field site to provide 2 high quality dwellings. They will therefore not only contribute toward the borough meeting its overall housing needs, but they will also help to broaden and diversify the housing choice in the area. The principle of development is therefore evidently supported by policies of the Bexley Local Plan and the London Plan subject to demonstration that they comply with all other relevant planning policies – which this statement now proceeds to assess:

Quality of Accommodation

6.8 Local Plan Policy DP11 Achieving high quality design provides the relevant guidance on this matter. Part 2 f and g, in summary, require that development proposals provide sufficient external amenity space relative to the scale of development and that they meet internal accommodation standards.

6.9 As set out in section 4, the proposals meet and exceed the standards set by the National Technical Housing Standards in all requirements. The overall size of each unit is significantly larger than the minimum size stated – providing an additional 4.9sqm for the ground floor unit and 6sqm of additional space for the 2 storey unit – in both cases around 15% more internal floorspace than the standards require. The proposals also meet all room size requirements and the necessary provision of internal storage areas.

6.10 In terms of external space provision, the Local Plan does not set specific quantities of space to be provided. Policy DP11 states that “sufficient space” should be provided and the Bexley Residential Design Guide repeats this stating that “the type and level of provision will vary depending on the characteristics of the development, the site and its context.” The London Plan and the recently adopted Mayors Housing Design Standards however do provide a figure, stating that 5sqm of space should be provided for every one or two bedspaces with a depth and width of 1.5sqm.

6.11 The proposals provide the ground floor unit with around 50sqm of private amenity space, and the 2 storey unit with around 42sm of space. Both of these areas provide significantly more space than the London Plan requires, and this will afford the future residents with a substantial quantity of useable outdoor space.

6.12 In addition to the quantity of space provided both internally and externally, care and attention has been taken to ensure this is also of a high quality. Both of the units are dual aspect, and both have rear access to their designated amenity spaces for ease of use. The existing house is unusual in its context due to the relatively large side garden and also its proximity to the access road which runs along the rear boundary. The benefit of both features is that this allows both units to be

provided with separate private amenity spaces, both of which benefit from large boundary treatments and fences which ensure privacy to future residents. The provided spaces thereby not only provide good amounts of space, but also a high quality of accommodation.

6.13 The standard of proposed accommodation is therefore demonstrated to be high, complying with the relevant requirements of Local Plan policy DP11, the Councils' Residential Design Guide, the London Plan and the London Residential Design Guide.

Impact Upon Neighbouring Amenity

6.14 Local Plan Policy DP11 part 2 d) requires development proposals to ensure that the amenity of existing properties is appropriately protected. As set out in section 4 the proposals do not involve the insertion of any new windows to the property that could raise issues of overlooking to neighbours. The proposals also do not involve any extensions or alterations to the property that could cause overshadowing.

6.15 The expected occupancy of the proposals is up to 3 persons on the basis of the adopted housing design standards, and this is considered to be entirely consistent with the general density of accommodation in the surrounding area. Refuse and recycling can be stored within the private amenity spaces of each dwelling, and overall the proposed intensification of use is not considered to result in any undue harm to neighbouring amenity. The proposals thereby comply with relevant requirements of DP11 in this regard.

Design

6.16 Part 1 of DP11 states that development proposals within Primarily Residential Areas must seek to protect or enhance the areas character and its amenities.

6.17 Care has been taken to meet this requirement by minimising the external alterations to the proposals to just the insertion of a door in the rear elevation. The existing front door to the property is retained, providing a shared access to each of the newly created flats. This arrangement means that there will be no signs of the proposals from the street, and the proposals will thereby have no impact upon the character of the area.

Highways & Servicing

6.18 The dwelling benefits from an existing dropped kerb which facilitates 1 off street parking space. The proposed development includes the addition of a further off-street parking space, and proposes a second dropped kerb on the driveway. This arrangement will provide each dwelling with 1 designated parking space.

- 6.19 Policy DP23 Parking Management states that the Council will apply the principles of sustainable development as expressed by Policy SP1 by balancing the need for parking against the environmental, economic and social impacts of traffic. On this basis proposals for residential development will be expected to provide parking within the lowest possible maximum parking standard set by the London Plan. The exceptions provided by the policy do not apply to the circumstances of the application site.
- 6.20 Table 10.3 of the London Plan permits up to 1.5 spaces per dwelling for proposals in outer London with a PTAL of 0-1, and so the proposed provision of 1 space per dwelling meets this requirement. Cycle storage facilities will also be provided in the gardens of each of the proposed units, providing secure and convenient storage for all future residents.
- 6.21 As previously stated, external refuse and recycling facilities will be provided for each dwelling within their private amenity spaces, with bins being moved onto the highway on collection day. The provision will be in accordance with the requirements of DP25 and DP26 of the Bexley Local Plan.
- 6.22 The proposals thereby provide adequate parking facilities for the proposed development as well as ample space for the provision of required refuse and recycling facilities. The proposals will therefore not have any detrimental impact upon highway safety, and so comply with policies DP23, 24, 25 and 26.

7 Conclusions

- 7.1 The adopted Bexley Local Plan supports the principle of development by encouraging proposals that make the most effective use of available land to increase the supply of housing through sensitive intensification. The local plan recognises the important role conversions such as the proposed development will play in the Borough meeting its identified housing needs, with 17% of the Council's housing land supply being dependant on windfall development.
- 7.2 The application site is unusual in its context with a plot width around double that of the vast majority of dwellings in the surrounding area. It is a brownfield site located within a clearly and designated residential area and is within 100m of the boundary of Welling and its defined "sustainable development area" as shown on the adopted Proposals Map. The application site is just an 8 minute journey from the local train station and 10 minute bus journey from the town centre.
- 7.3 The proposed development implements the Councils' adopted policy by making a more effective use of the existing building to provide two new residential units that meet and exceed all adopted planning policy requirements. This includes the provision of significant areas of external private amenity space and off-street parking. The internal space provided is of a high standard, meeting the overall size requirements as well as room sizes and the provision of dedicated storage areas.
- 7.4 The only external change to the building is the provision of a door providing direct access to the garden for the proposed 2 storey dwelling. The proposals do not involve the provision of any other windows, alterations or extensions and as such have no impact upon the character or appearance of the area. The proposals will also not have any impact upon neighbouring amenity.
- 7.5 The provision of off street parking and refuse / recycling facilities ensures that the proposals will not have any impact upon highway safety, and the expected levels of occupancy will not have any detrimental impact upon the area also.
- 7.6 The proposals have therefore been demonstrated to meet all relevant policies of the adopted Bexley Local Plan, the London Plan and the NPPF plus all other guidance. They will make a positive contribution to the area and help the Council meet its stated objective of providing a broader range of dwelling types and we respectfully ask that planning permission be granted accordingly.