

# LONDON STAY APARTMENTS

## THE ALEXANDRA LOFT CONVERSION OF BLOCK163-C

### PLANNING STATEMENT

163 Parish Lane,  
London  
SE20 7JH



November, 2023

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## 1 INTRODUCTION

1.1 This statement provides an assessment of proposed development at The Alexandra in 163 Parish Lane, London, SE20 7JH within the context of relevant planning policy and considerations.

1.1 The Statement is accompanied by the following documents:

- Design and Access Statement
- Drawings Pack, containing Existing and Proposed Plans, Elevations and Sections

1.2 This document provides information about the site and its history; details of the proposal; and a summary of relevant planning policy. It's structured as follows:

- Site and Surroundings
- Planning History
- Proposed Development
- Planning Policy
- Planning Considerations
- Conclusion

## 2 SITE AND SURROUNDINGS

- 2.1 The site is located on the corner of Parish Lane and Penge Lane. The development comprises a 20<sup>th</sup> century three-storey brick building. It is currently used as a public house with HMO units above.
- 2.2 The site is within a residential use area: there is a railway crossing along the southwest façade, to the east Parish Lane, and across the road residential use.
- 2.3 The building's name is the same as the Alexandra Cottages located in Parish Lane, which were constructed between 1866-1868.

## 3 PLANNING HISTORY

- 3.1 The planning application history for the property located at 163 Parish Lane, SE20 7JH is listed below.
  - Erection of an additional storey on top of the shorter block with 3 HMO rooms and 1 communal kitchen and upward single storey roof extension across both blocks with 4 HMO rooms and 1 communal kitchen (Use Class C4) along with cycle parking spaces and bin storage. Retention of Pub in the ground floor (use class A4/A3). Retention of use of upper floors HMO 'Sui Generis' (Use Class C4) accommodation comprising accessible unit on the ground floor, 13 bedrooms with communal kitchen facilities on first and second floors. Ref. No: 21/04986/FULL1 | Status: Application Refused
  - Upward single storey roof extension to form 2 two bedroom flats with associated cycle and bin storage. Retention of Pub on the ground floor (use class A4/A3). Retention of use of upper floors HMO (Use class - sui generis) accommodation comprising 1 self-contained unit on the ground floor, 13 bedrooms with shared kitchen facilities on the first and second floors. Ref. No: 20/03972/FULL1 | Status: Application Refused
  - Change of use of part rear public space adjacent to Bycroft Street to an external area for customer use associated with The Alexandra Pub (Use Class: A4) Ref. No: 19/02547/FULL1 | Status: Invalid Application Returned.
  - The construction of a steel pergola in replacement of a wooden pergola to the rear elevation of the building. Ref. No: 17/00807/FULL1 | Status: Application Permitted
  - Application Reference Number: DC/14/04392/FULL1 Date of Decision: 06/05/2015 Condition Number(s): 2 and 7 Conditions(s) Removal: To account for the door and window frames, which are aluminium. Amended in order to render explicit the approval for aluminium frames - which permission neither expressly denied nor confirmed. Ref. No: 17/00594/RECON | Status: Application Withdrawn.
  - Minor material amendment under Section 73 of the Town and County Planning Act 1990 to allow a variation of the planning permission 14/04392 for elevation alterations including ventilation ducting to the rear, change of use of public house (Class A4) to mixed public house/restaurant use (Class A4/A3) and conversion to provide HMO accommodation comprising 1 self-contained unit on the ground floor, 12 bedrooms with shared kitchen facilities on first and second floors, amenity space, cycle and refuse storage (at the rear) to allow variation in the design and materials of fenestration on the first and second floor and the revised layout and materials of the ground floor elevations. (RETROSPECTIVE APPLICATION). Ref. No: 17/00455/RECON | Status: Approved
  - Internal layout amendment. Ref. No: 14/04392/AMD | Status: Approve Non Material Amendment
  - Details of conditions submitted in relation to planning permission ref: 14/04392/FULL1 Condition 4 - Cycle Storage Condition 8 - Sound and Heat Transfer Condition 11 - Car Club Ref. No: 14/04392/CONDT3 | Status: Decision for Planning Conditions

- Details of conditions submitted in relation to planning permission ref: 14/04392 Condition 3: details of arrangements for storage of refuse and recyclable materials. Ref. No: 14/04392/CONDT2 | Status: Decision for Planning Conditions
- Removal of conditions 3 (details of refuse storage) of planning permission reference 14/04392 for elevation alterations including ventilation ducting to the rear, change of use of public house (Class A4) to mixed public house/restaurant use (Class A4/A3) and conversion to provide HMO accommodation comprising 1 self-contained unit on the ground floor, 12 bedrooms with shared kitchen facilities on first and second floors, amenity space, cycle and refuse storage (at the rear) Ref. No: 15/04276/RECON | Status: Invalid Application Returned
- Details of conditions submitted in relation to planning permission ref: 14/04392/FULL1 Condition 10: Travel Plan. Ref. No: 14/04392/CONDIT | Status: Decision for Planning Conditions
- Details of conditions submitted in relation to planning permission ref: 14/04392/FULL1 Condition 5: Construction Logistics Management Plan Ref. No: 14/04392/COND1 | Status: Decision for Planning Conditions
- Elevation alterations including ventilation ducting to the rear, change of use of public house (Class A4) to mixed public house/restaurant use (Class A4/A3) and conversion to provide HMO accommodation comprising 1 self-contained unit on the ground floor, 12 bedrooms with shared kitchen facilities on first and second floors, amenity space, cycle and refuse storage (at the rear). Ref. No: 14/04392/FULL1 | Status: Application Permitted
- Change of use from class A4 (public house) to Class A3/A4 (public house/restaurant) with hostel accommodation (sui generis) to provide 11 bedrooms with shared kitchens and 5 one bedroom suites, associated car parking, cycle storage and refuses storage. Ref. No: 13/04084/FULL1 | Status: Application Refused.

#### THE MOST RECENT REFUSED APPLICATION

3.2 A recent application with the number 21/04986//FULL1 has been made for the addition of a third floor for the shorter block (163-D) and a loft conversion for both bodies, creating 7 additional HMO units with 2 additional communal kitchens while avoiding any harm to the neighbourhood and protecting the existing building's architectural character.

3.3 The application was refused for the following reasons:

- The proposed development by reason of its prominent siting, height, scale, massing and dominant design in this prominent location, represents an uncharacteristic punctuation in the streetscene out of character and context to the scale and massing of the existing building and general pattern of lesser scale of development in the vicinity and the adjacent Alexandra Cottages Conservation Area, harmful to the visual amenities of the area and contrary to Policies 4, 37 and 42 of the Bromley Local Plan and Policies D3, D6, H2 and HC1 of the London Plan.
- The proposed development would fail to provide a satisfactory standard of quality accommodation for future HMO occupiers contrary to Bromley Local Plan Policies 4 and 37 and Policies D3 and D6 of the London Plan

Some of the comments made on the refused application by the planning officer are listed below:

- The two buildings comprising the pub are distinct from each other in design and height. The shorter building has an interesting original roof lantern feature which would be lost in this development and the additional height would destroy the varying roof profile which is widely seen and would merge both buildings into a single block detrimental to the historic streetscape and adjacent Conservation Area and to the architectural integrity of the non designated heritage assets.
- Inadequate provision of Natural Light to a Habitable Room. Adequate natural light is an unobstructed area of glazed window and or door equivalent to at least 1/10th the

room's floor area, which provides a reasonable outlook and view of the surroundings. In addition the roof lights to these bedrooms will not provide the occupiers of the bedrooms with a reasonable outlook or view of the surroundings.

- Out of keeping with houses in the adjacent Alexandra Cottages Conservation Area and locality in general.

3.4 The issues raised by the officer have been addressed with the new design which proposes alterations only of the taller block 163-C, while the shorter block (163-D) remains as existing. The overall size of the project is reduced and it would match the scale of the surroundings. The new bedrooms have dormer windows, allowing the occupiers with a with a reasonable outlook or view of the area.

#### 4 PROPOSED DEVELOPMENT

4.1 The application seeks full planning permission for:

4.2 *Erection of a mansard roof extension at 60° over the taller Block "C" to create an additional floor, comprising two double HMO bedrooms and a communal kitchen (use class C-4), along with two additional cycle parking spaces and bin storage at the edge of the curtilage. Retention of Pub on the ground floor (use class A4/A3). Retention of use of upper floors HMO 'Sui Generis' (use class C-4), 14 bedrooms with communal kitchen facilities on first and second floors. The original height of the existing building of 12.45m will be retained*

4.3 It has also taken into account concerns about cycle parking and bin storage by providing both. The proposed cycle parking area will benefit both existing and proposed units.

4.4 For further information on the proposed scheme in the context of its surroundings please refer to the plans and the Design and Access statement.

#### TRANSPORT CONSIDERATIONS

4.5 One of the previous application, **14/04392** included a transport statement which demonstrated that the proposed HMO development did not generate a material transport impact on the site.

4.6 The proposed development adds two bicycles to the existing cycle racks bay within the property.

4.7 The site is an accessible location with a good public transport accessibility rating (PTAL) of 4.

4.8 Accordingly, it is not considered that the proposed development will result in a detrimental transport impact.

## 5 PLANNING POLICY

### NATIONAL PLANNING POLICY GUIDANCE

- 5.1 The National Planning Policy Framework ('NPPF') sets out the Government's vision of sustainable development in England, and how it will be facilitated by the planning process. Central to the ideas of sustainable development is the importance of the economic, social and environmental roles which development can play.
- 5.2 The Planning Practice Guidance ('PPG') - which supports the NPPF's policies and provides wider guidance and explanation - states that the NPPF represents up-to-date Government planning policy and must be taken into account where it is relevant to a planning application.
- 5.3 The new design proposition also considers the Regulatory Reform Fire Safety Order of 2005 and the approved document part B.

### Delivering a Wide Choice of High Quality Residential Spaces

- 5.4 Paragraph 61 - within the context of housing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

### Making Effective Use of Land

- 5.5 Paragraph 123 - Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:
- authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

### LOCAL DEVELOPMENT FRAMEWORK

- 5.6 The Local Development Framework for London Borough of Bromley includes:
- Policies Map (Planning Policy, Bromley Local Plan).
- 5.7 Bromley's Local Plan was adopted on 16 January 2019 and, in conjunction with the London Plan.

### POLICY AND DESIGNATIONS DOCUMENT

#### Community Assets

- 5.8 Policy 6.7 Public Houses - London Borough supports the retention of pubs that have a community role and will resist the change of use or demolition except where continued use as a pub is no longer economically viable. Evidence must be submitted to clearly



demonstrate that reasonable attempts have been made to actively market the site as a pub for at least two years.

- 5.9 The elements of Draft Policy 23 (Public Houses) Loss of Community Facilities - The loss of public houses will be resisted by the Council except where: (a) There is an alternative public house within a 500 metre walking distance of the site; and, (b) It can be demonstrated that the business is no longer financially viable as a public house, including the submission of evidence of active marketing as a pub for a substantial period of time.

### Housing Design

- 5.10 Policy 5.3 Housing Design - All developments are required to be of a high quality of design and to demonstrate that they positively contribute to the improvement of both the built and natural environments. Following the Adopted Supplementary Planning Guidance and No. 2 Residential Design Guidance. Section 2.2 Extensions. The extensions proposed in this document will respect the composition of the host building, the rhythm of form as well as the general details.

- 5.11 London Plan 2020 states on Policy D4 that delivering good design should cover the following;

A- Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.

B- Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

C- Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

D- The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:

1) include a residential component that exceeds 350 units per hectare; or

2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.

E- The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

1) design reviews are carried out transparently by independent experts in relevant disciplines

2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme

3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews

4) design review recommendations are appropriately recorded and communicated to officers and decision makers

5) schemes show how they have considered and addressed the design review recommendations

6) planning decisions demonstrate how design review has been addressed.

F- The design quality of development should be retained through to completion by:

1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development

2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design

3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter

4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

#### Neighbouring Amenity

5.12 Policy 8.1 General Design and Development. Respect the amenity of occupiers of neighbouring buildings and those of future occupants ensuring their environments are not harmed by noise and disturbance, inadequate daylight, sunlight, privacy or by overshadowing;

5.13 Right of Light Act 1959. Prescription Act 1832. A right to light is an easement whereby a building has the right to receive sufficient natural light through the defined apertures to allow the building to be used for its ordinary purpose. The development proposal does not leave neighbouring buildings with inadequate light.

#### Conservation Areas

5.14 The proposal is aligned with the objectives set in local plan:

- Continue to protect locally and nationally significant heritage assets.
- Ensure development complements and improves the setting of heritage assets.
- Encourage greater accessibility of heritage assets.
- Encourage a proactive approach to the protection and improvement of heritage assets to contribute to strategic, local planning and economic objectives.

#### Character

The proposal also considers the Vision of Bromley 2030:

5.15 The protection and enhancement of conservation areas and historical assets such as Downe House, Crystal Palace and Biggin Hill, along with high quality new development have contributed to civic pride and wellbeing.

- 5.16 The Green Belt fulfils its purpose, and, together with other open spaces, contributes to protecting Bromley's special character and the health and wellbeing of local residents and visitors alike.

#### LONDON BOROUGH OF BROMLEY - ADOPTED STANDARDS FOR HOUSES IN MULTIPLE OCCUPATION (HMO)

- 5.17 The document states that the minimum room sizes for single bedrooms or bedsits with adequately sized shared kitchens is 7m<sup>2</sup>, while for double bedrooms, the minimum size is 11m<sup>2</sup>
- 5.18 Where an HMO has no shared common room the bedroom size shall increase by a further 4m<sup>2</sup>. That adds up to 11m<sup>2</sup> and 15m<sup>2</sup> respectively.
- 5.19 The proposed development meets the priority standards for internal spaces that are listed below:
- Each unit of accommodation shall be no more than 1 floor from a bathroom or toilet.
  - Where there is no shared dining room on the same floor as a shared kitchen or where the kitchen is not a kitchen-diner all units of accommodation shall be located no more than one floor from the shared kitchen.
  - Any floor area with a ceiling height of below 1.53m is disregarded as non-useable floor area and at least 75% of the remaining useable floor area must have a ceiling height of 2.13 m or more.
  - All HMOs must be provided with a suitable means of escape from fire and adequate fire precautions.
  - Where fire doors are required to a room or rooms opening on to an escape route they should be rated at 30-minute fire protection, hung on 3 hinges, self-closing and fitted with combined intumescent strips/cold smoke seals (BS 8214:2008).

## 6 PLANNING CONSIDERATIONS

### PRINCIPLE OF PROPOSED USE

- 6.1 The site is currently public house use (A4/A3) in the ground floor and HMO (use class C-4) in the stories above. The proposal seeks additional HMO units and a communal kitchen on the additional floor.
- 6.2 The scheme complies with the retention of pubs which is explicitly supported in policy 6.7.

### PRINCIPLE OF RE-DEVELOPMENT AND RETENTION OF THE BUILDING

- 6.3 The proposed scheme will ensure the retention of the existing building, and secures the future viability of the existing pub use. The retention of the building will preserve the existing character of the area, and positively affect the designated Area of Special Character. These considerations are both supported by Bromley's 2030 Vision and objectives. The scheme retains the current building and ensures its long-term viability.
- 6.4 The proposal will retain the pub and the existing HMO residential units as well as the accessible self-contained unit in the ground floor. The additional storey will follow the

rhythm of the existing elevation and proposed roof will not be seen on from the street level. The proposal takes into account the historic character of the building, and is sensitively considerate of it.

#### DESIGN CONSIDERATIONS

- 6.5 The proposed loft conversion is respectful to the appearance of the existing building.
- 6.6 There is no unacceptable impact on the residential amenity of future or existing occupiers through loss of privacy, sunlight and daylight and disturbance from additional traffic.
- 6.7 The proposal includes cycle spaces, specifically one space per one unit and all internal spaces comply with relevant space standards.
- 6.8 The scheme meets the standards set by Bromley 2030 vision and objectives, and respects both the character of the existing building and its setting within the Conservation Area.

#### IMPACT ON NEIGHBOURING AMENITY

- 6.9 The NPPF states that, regarding proposals that provide housing where there is an anticipated shortage, decision makers should take a flexible approach in applying daylight and sunlight policies if they inhibit the efficient use of a site. There is an existing shortage of housing within London. The site has the capacity to provide sustainable residential units with acceptable living standards to meet this shortage.

### 7 CONCLUSION

- 7.1 This statement has provided a description of the site complete with planning history, and has described and assessed the proposed works with reference to relevant planning policy.
- 7.2 The proposal is considerably designed to preserve the future use and existence of the building - which is recognised to have historic character. The scheme is appropriately considerate towards the existing building. It makes effective use of land (as mandated by NPPF paragraph 123).
- 7.3 The scheme does not affect the amenity of adjacent properties.
- 7.4 The proposed uses are supported by local policy, and the design meets the standards set by the local authority.
- 7.5 The scheme should therefore be supported by the London Borough of Bromley, and consequently permitted.