



WELLING UNITED FOOTBALL CLUB

Planning Statement

On behalf of **Woolwich Road Limited**

Project Ref: 34093/A5/AK | Date: December 2023

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For and on behalf of Stantec UK Limited				

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1 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Woolwich Road Limited ('the applicant'), in partnership with Welling United FC, in support of an application for full planning permission for the redevelopment of the Welling United Football Club ('WUFC') Park View Road Stadium and 1-3 Park View Road, Welling DA16 1SY ('the site').
- 1.2 Woolwich Road Limited is a joint venture partnership between Lita Homes and Welling United Football Club to deliver the proposed development in collaboration; this ensures the football club are involved in the application, as they have been with design evolution.
- 1.3 The site covers an area of 1.19 hectares and is located within the administrative area of the London Borough of Bexley ('The Council' or 'Bexley').
- 1.4 The proposed description of development is as follows:
- 'Redevelopment of the site to provide new Welling FC stadium and accompanying football facilities (Class F2), residential dwellings (Class C3) and commercial uses (Class E), along with associated public realm improvements, car and cycle parking, and refuse and recycling stores.'*** ("the development").
- 1.5 The existing facilities are in a very poor state of repair, as pictured in the accompanying design document. The changing rooms are inadequate for purposes, there are leakages due to the state of the roof, and there is little scope to improve the facilities due to income constraints. Additionally, the current facilities and grass pitch significantly limit opportunities for the wider teams within the Welling FC umbrella to play and train on-site.
- 1.6 Without the redevelopment of the site, the club will not be able to maintain itself financially and will therefore cease to operate, which in-turn will result in the loss of various initiatives which benefit the local community significantly; there is therefore an acute need for the site to be rejuvenated to enable the club to grow and maintain itself, which must be delivered through redevelopment of the site, due to financial circumstances.
- 1.7 To address these issues, a comprehensive redevelopment of WUFC's facilities is proposed to ensure the long-term vitality and viability of the football club, and ensure that this important local institution is retained in the long term. The proposed rejuvenation of WUFC's facilities will also enable the club to widen its community offer and therefore generate further benefits to the local population, and further ingrain the club in the local fabric and community.

1.8 The key benefits of the Proposed Development, as elaborated upon in Appendix 1, include:

- New high-quality facilities for Welling FC to safeguarding their long-term future as a football club and provider of community services. The facilities will enable the club to run 7 days a week, thereby enabling the club to run sustainably, without owner or supporter donations; key facilities are:
 - A 3G astroturf pitch, thereby enabling use throughout the week.
 - New bar, café, club shop and ticket office for the fans, and generating additional revenue for the club.
 - New changing rooms, officials' rooms, physiotherapy room, storage rooms, function rooms, and club offices, amongst others.
 - On-site classrooms for academy/apprenticeship teams, bringing existing teams onto the site. Opportunity to increase the number of youth teams as a result, in tandem with the Academy's potential relocation.
- Improved stadium stands to further expand and generate matchday revenue and growth, ensuring the long-term viability of the football club, and providing greater opportunities for the local community to engage. Opportunity to increase capacity to 5,000 if the club secures promotion, thereby meeting FA requirements and future-proofing the club to move to the next echelon without requiring any significant work.
- Indicative pitch/stadium schedule of 57 hours a week, greatly improving opportunities for the local community to engage with and use the site (compared with the existing 10 hours a week for the grass pitch). Targeted community initiatives include:
 - Use for local schools to be arranged, free-of-charge, during working hours. School cup finals and other annual tournaments can take place at the site.
 - Holiday activities organised by the Football in the Community team will ensure children and teenagers are positively occupied outside of term time. Football camps, Girls development initiatives, summer camps and wider events will be possible on the new 3G astroturf pitch.
 - Targeted initiatives with key local/football groups including LB Bexley Youth Services; MAN v FAT; Premier League Girls; Kick it Out; Show Racism the Red Card; EFL Trust; Frame Football; Spirit of Football; and Weetabix Wildcats.
 - Greater possibility of hosting community events, and extended hours where this can be facilitated. Opportunities for larger-scale events with local/national organisations.
 - New Astro pitch and function rooms to be integrated into the wider community engagement programme, given it can be used more frequently/extensively.
 - New walking football and wheelchair football initiatives to come forward
- Growth of the football club and Academy, estimated as follows:

- +30/40 senior players;
- Potential future growth to:
 - over 100 youth teams across all ages and genders; and
 - over 300 students in the Academy.
- Reduced stress on existing football/grass pitches within the Borough and the wider surrounding area, thereby helping alleviate existing capacity constraints. New pitch will also help meet an identified need within Bexley's Green Infrastructure Study (Appendix J Playing Pitch Audit – Sport Specific Action Plan).
- Improved disabled access to/from the stadium, thereby increasing opportunity to engage.
- Delivery of new much-needed homes and family units.
- High architectural quality and design, which will improve local townscape.
- Improved public highways arrangements along Park View Road, helping to improve safety and reduce congestion whilst providing suitable servicing and delivery arrangements.
- Temporary construction and permanent jobs, as well as opportunities for apprenticeships and training. General socio-economic benefits generated by the scheme, as set out in the socio-economic infographic enclosed in Appendix 5 of this Planning Statement.
- Significant financial contributions in the form of CIL and S106 obligations, which can/will be used to secure improvements to the site and wider locality.
- Greatly-improved, policy-compliant energy and sustainability strategy for the proposals, helping to reduce emissions and improving its environmental friendliness.
- Improved floodlighting arrangements, helping to reduce impacts on local residents and surrounding wildlife.
- High-quality drainage strategy to reduce potential flood risks and better the site.
- Urban Greening Factor and Biodiversity Net Gain, improving on the existing site.

THE APPLICATION

1.9 This Planning Statement forms part of a suite of documents, as follows:

- Cover Letter;
- Application Form;
- CIL Additional Information Form;
- Existing, Proposed and Landscaping Plans;
- Design and Access Statement (incl. Landscape);
- Planning Statement;
- Statement of Community Involvement;
- Financial Viability Assessment Report;
- Air Quality Assessment;

- Archaeological Desk-Based Assessment;
- Extended Phase 1 Habitat Survey;
- Bat Survey Report;
- Biodiversity Net Gain Assessment Report;
- Daylight and Sunlight Assessment;
- Energy and Sustainability Strategy;
- Overheating Analysis Report;
- Flood Risk Assessment and Surface Water Drainage Strategy;
- Townscape & Visual Impact Appraisal;
- Verified Views;
- Heritage Statement;
- Phase 1 Desk Study;
- Noise Assessment;
- Transport Assessment;
- Delivery and Servicing Plan;
- Residential Travel Plan;
- Stadium Travel Plan;
- Active Travel Zone (ATZ) Assessment;
- Event Management Plan;
- Construction Phase Plan (incl. Site Waste Management Plan);
- Construction Traffic Management Plan;
- Planning Fire Safety Strategy Report;
- Gateway 1 Fire Statement;
- Whole Life Cycle Carbon Assessment;
- Circular Economy Statement;
- Arboricultural Impact Assessment (incl. Tree Survey);
- Lighting Report; and
- Utility Assessment Report.

1.10 The following section provides an overview of the site and its surrounding area.

2 APPLICATION SITE AND SURROUNDING AREA

A. APPLICATION SITE

- 2.1 The site is located within the London Borough of Bexley and comprises the WUFC Park View Road Stadium, as well as 1-3 Park View Road.
- 2.2 The site adjoins Danson Park, but is strongly visually screened by existing trees on the southern boundary.
- 2.3 Vehicular access is via Park View Road; there are a total of 13 spaces on-site, as well as one ambulance. Bus stops providing regular services are within walking distance of the site, with the westbound bus stop being located immediately to the north.
- 2.4 The site primarily has a PTAL of 3, with elements of PTAL 2 along the western and southern portions.
- 2.5 The site is also within Flood Zone 1, and therefore at a lower risk of flooding.

i. Park View Road Stadium

- 2.6 Park View Road Stadium is the home of WUFC since 1977, as well as Erith & Belvedere who have been ground sharing since 1999. The stadium was originally built in 1925 and has a main stand on the western side and a second stand on the eastern side, which offer seated capacity. Standing capacity is also provided on the northern and southern sides.



Figure 1: Existing Park View Road Stadium

- 2.7 The site also contains a small bar, function area and Erith and Belvedere's clubhouse in small structures around the stadium.

2.8 Vehicular and pedestrian access to the stadium is via Park View Road.

2.9 The stadium and existing facilities are in a very poor state of repair; the changing rooms are inadequate for purposes, there are leakages due to the state of the roof, and there is little scope to improve the facilities due to income constraints. Please see the accompanying Design and Access Statement, prepared by Create, for further information.



Figure 2: Photographs of Existing WUFC Facilities

2.10 The playing pitch is made of grass; this significantly limits opportunities for the wider teams within the Welling FC umbrella to play and train on-site; as a result, the numerous Academy, youth teams and other teams in the club are dispersed, and must rely on other pitches in the wider area.

ii. 1-3 Park View Road

2.11 1-3 Park View Road is a part-three, part-two storey brick building along Park View Road. The building is primarily in commercial use (Class E), with some residential apartments (Class C3) to the rear.



Figure 3: 1-3 Park View Road



Figure 4: View 1-3 Park View Road looking West (along Park View Road)

B. SURROUNDING AREA

- 2.12 The immediate surrounding area is predominantly residential in nature, consisting of two-storey, terraced/semi-detached houses.
- 2.13 Danson Park is located to the immediate south of the site. Danson Park is a 75-hectare public park which was originally opened in 1925. The Park is Grade II listed and also contains two listed buildings: 'Danson Park Mansion' (Grade I) and 'Stables to Danson Park' (Grade II*). Danson Park is also a Site of Importance for Nature Conservation.
- 2.14 Bexleyheath Cricket Club's pitch and grounds are located immediately to the east of the site.
- 2.15 Welling Town Centre is located a short distance from the site, approximately 5 minutes walking. Bexleyheath Town Centre is also located approximately 1 mile to the east, along Park View Road (A207). Both town centres provide a variety of town centre uses, and generally have denser built form than the surrounding areas.



Mckinlay Court, approaching Welling Town Centre



Embassy Court, Welling Town Centre



249 Broadway, approaching Bexley Town Centre



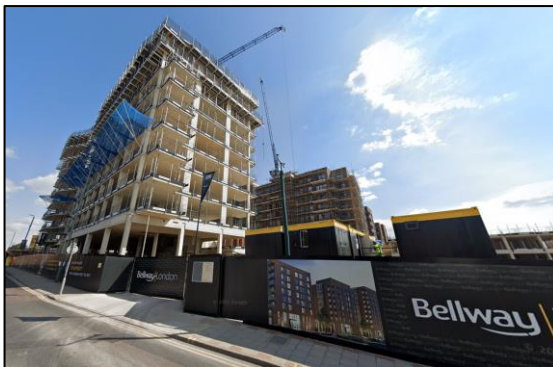
Heath House, approaching Bexley Town Centre



Cardamom Court, Bexley Town Centre



Eastside Quarter, Bexley Town Centre



Eastside Quarter, Bexley Town Centre



Eastside Quarter, Bexley Town Centre

Figure 5: Photographs of Local Context & Built Form

2.16 With regard to nearby football stadiums, Charlton Athletic F.C.'s football ground, The Valley, is the closest significant football ground (circa 4 miles away). Stadiums are, by their nature and function, architectural markers that are typically larger than the surrounding built form, and this is illustrated by this ground and its surrounding context.



Figure 6: Aerials of The Valley (Google Maps)

2.17 The following section sets out the site's background and history.

3 PLANNING HISTORY & DESIGN EVOLUTION

3.1 This section provides an overview of the site's history and background. Relevant planning history for surrounding sites is also provided.

A. SITE PLANNING HISTORY

3.2 Table 3, below, provides an overview of the site's planning history:

TABLE 3: SITE PLANNING HISTORY		
Application Ref.	Proposal	Decision (Date)
Welling United Football Club		
16/02952/FUL	Use of land for car wash and valeting including re-location of portacabin and provision of canopy.	Refused 10/04/2017
02/02722/FUL	Installation of a 12m x 3m telecommunications brickbuilt building containing telecommunications equipment and a 22.3m slimline lattice tower comprising 2 x 600mm dishes and 5 antennas to replace existing floodlight tower.	Withdrawn 26/11/2003
02/01118/FUL	Erection of a 25 metre high SSPP lattice tower comprising 3 no. 600mm dishes and 7 antennas on two circular headframes to replace existing floodlight tower and a 12m x 3m telecommunications building containing equipment cabinets	Withdrawn 10/05/2022
01/02298/FUL	Erection of detached building for use as a toilet block.	Granted 15/10/2001
99/02849/FUL	Erection of a new covered stand with associated floodlighting. Erection of new changing facilities and social club	Granted 10/03/2000
99/02358/ADV	One free-standing advertisement hoarding.	Refused 22/11/1999
94/00864/FUL	Erection of a building for use as a supporters club shop.	Granted 30/06/1994
93/02090/ADV	Erection of fascia boards over turnstiles and eight advertisement panels on front fence.	Granted 20/10/1994
93/00829/ADV	3 advertisement hoardings	Withdrawn 06/09/1993
92/00344/FUL	Erection of a telecommunication base station comprising of 30 metre high tower incorporating aerials, dishes and floodlights and equipment cabin and security fencing.	Withdrawn 02/11/1992
91/01253/ADV	2 advertisement hoardings 2 flag(s) on flagpole(s)	Withdrawn 22/01/1992
91/00993/FUL	First floor extension over existing bar area and two storey extension to form staircase and WC's.	Granted 04/10/1991

TABLE 3: SITE PLANNING HISTORY		
Application Ref.	Proposal	Decision (Date)
1 Park View Road		
16/03237/FUL	Change of use from retail (Class A1) to cafe (Class A3)	Granted 05/04/2017
95/01948/FUL	Change of use from retail (Class A1) to use for hot food take-away (Class A3).	Granted 16/02/1996
81/00133/ADV	Illuminated fascia sign.	Granted 11/12/1981
3 Park View Road		
04/01529/FUL	Retention of new shopfront.	Granted 10/06/2004
98/01150/ADV	Two externally illuminated wall fascia signs.	Granted 09/09/1998

3.3 Given the age of many of the above planning applications, limited information is available.

B. PRE-APPLICATION ENGAGEMENT

3.4 Extensive pre-application engagement has taken place on the proposed development.

3.5 Paragraph 39 of the National Planning Policy Framework (2023) states that “early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”

3.6 In addition, National Planning Policy Guidance (NPPG) outlines that “pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications and their likelihood of success.” Furthermore, the NPPG goes on to state that “a planning performance agreement can be a useful tool to focus pre-application discussions on the issues that will need to be addressed throughout the course of preparing and determining a planning application, and the timescales and resources that are likely to be required”.

3.7 The applicant has formally engaged with Council officers on the redevelopment of the site since October 2022. There have been a number of pre-application meetings, including the following:

- 11 October 2022 (LBB);
- 2 February 2023 (LBB);
- 3 July 2023 (DRP);

- 27 July 2023 (GLA, TfL & LBB);
- 2 August 2023 (LBB);
- 3 October 2023 (Kent FA);
- 16 October 2023 (London FA);
- 19 October 2023 (LBB).

- 3.8 As outlined above, the scheme has gone through Design Review Panel, along with meetings with key stakeholders such as LBB, GLA, TfL, Kent FA and London FA. In addition to this, discussions have been held with Sport England, the Football Foundation, and Designing Out Crime officers.
- 3.9 Bexley officers, over the course of multiple meetings, have requested that the very special circumstances case be robust, and have raised concerns around the scale and massing of the proposed building.
- 3.10 DRP panel members recognised the potential to redevelop the site to celebrate Welling Football Club, but raised concern with the scale of development and its relation with the surrounding context. Queries around the co-location of uses were also raised, with members concerned that the site's identity as a football stadium had been diluted as a result of the proposals.
- 3.11 In response to this, further design work was undertaken to create a sense of identity and relationship between the building and the stadium use; this includes glazed bricks, gates and metalwork matching club colours, along with a club roundel and name on the building's street elevation. Careful consideration has been given to the materials and detailing proposed in order to reduce the perception of scale and massing.
- 3.12 GLA officers were supportive of the principle of redevelopment to deliver enhanced sports facilities and introduce housing, but noted that a suitable very special circumstances case would need to be submitted, which they believe could be achieved. No issues with the overall scale and massing were raised, albeit comments on the detailed design were provided and it was confirmed that justification would be required to support the tall building proposals, in line with London Plan Policy D9 and Bexley Local Plan Policy DP12. Whilst officers acknowledged that this is enabling development with viability challenges, concern was raised regarding the lack of affordable housing provision.
- 3.13 Relevant sporting and footballing stakeholders, namely Sport England, Football Foundation, Kent FA and London FA have been fully supportive of the proposals in principle.

- 3.14 Further information on the design evolution is provided in the accompanying Design and Access Statement.

C. PUBLIC CONSULTATION

- 3.15 In addition to engaging with relevant stakeholders at the pre-application stage, public consultation has also been undertaken.
- 3.16 A public consultation event was held on-site on Monday 10 July 2023 at Welling United FC, Park View Road, Welling, DA16 1SY, with the fan preview session running from 1pm to 3pm and the public session from 3pm to 7pm, with an invitation sent to 2,212 addresses.
- 3.17 In addition, so as to maximise engagement, a dedicated project website was set up and has been operational since 29 June 2023: <https://wellingparkviewroad.co.uk/>. The website contains key information about the proposals, downloadable versions of the information boards displayed at the public consultation event, a feedback section, and contact details. To ensure that stakeholders could easily get in touch with the project team about any matters relating to the proposals, a project email address – info@wellingparkviewroad.co.uk – was also established.
- 3.18 At the event, attendees were able to view information boards detailing the proposals, meet and ask questions of members of the project team, and provide feedback on the proposals. Attendees of the fan preview session were also given a presentation by the project team and representatives from Welling United FC and were able to ask questions in a Q&A session.
- 3.19 In total, 204 people attended the public exhibition, with 95 people attending the fan preview session and 109 people attending the public session. This included Cllr Nigel Betts, Cllr Daniel Francis, and Cllr Stefano Borello. Additionally, 90 people submitted physical feedback forms and 42 people submitted online feedback forms.
- 3.20 The majority of respondents viewed the overall proposals for the Site positively. In their responses, they highlighted that the club / site had long needed investment and that the proposals would not only secure the club for the future but be positive addition locally. However, others viewed the proposals more negatively, raising concerns about the level of parking and the size of the residential development. Stakeholders also requested that the proposals be turned to a four-sided stadium, and with ground-floor club bar/shop with direct access on both sides of the building.
- 3.21 In response to comments received during the consultation process, a number of amendments have been made to the consultation proposals:

- Reduction of proposed number of homes from 114 to 104;
- Reduction in mass of the East Wing;
- More symmetrical facade composition;
- Improved integration of the residential building to the Park View ground and greater club identity on the residential block, including signage and material details;
- Addition of a central podium garden to service the middle blocks;
- All cycle parking combined into a single basement with a dedicated cycle lift.
- Significantly improved and rationalised ground floor layout, with reductions in inactive frontages;
- Reduction of ground floor commercial/retail spaces;
- Spectator facilities and matchday experience improved, including details for advertising locations, flood lights and F&B pop ups i.e., location for a burger van stand;
- Better spectator entrance gates for home and away supporters;
- Vehicle and spectator access points separated;
- Improved club shop and bar, providing direct, level access both within the football ground and from Park View Road;
- Cores reconnected to provide an alternative (2 stair) means of escape; and
- Car club moved to Denham Close.

3.22 Regular contact has been maintained with the three ward councillors for Falconwood & Welling and the Leader of the Council throughout the consultation process. This has included invitations to meet for a briefing, an invitation to the public consultation event, and follow up emails.

3.23 Please see the accompanying Statement of Community Involvement, prepared by Cratus, for further information on the engagement programme and feedback received.

4 THE PROPOSED DEVELOPMENT

4.1 Full planning permission is sought for the following development:

‘Redevelopment of the site to provide new Welling FC stadium and accompanying football facilities (Class F2), residential dwellings (Class C3) and commercial uses (Class E), along with associated public realm improvements, car and cycle parking, and refuse and recycling stores.’

4.2 Table 4, below, provides an overview of the proposed development:

TABLE 4: PROPOSED DEVELOPMENT OVERVIEW	
Stadium Facilities	<p>New 3G Pitch for professional and community use.</p> <p>Stadium/stand works resulting in 4,044, four-sided spectator capacity, comprising 600 standing and 1,414 seating (including 30 disabled seats).</p> <p>New high-quality facilities to replace existing facilities lost to redevelopment (see further below for list of new facilities).</p>
No. of Homes	104 units.
Unit Mix	<ul style="list-style-type: none"> • 1b: 24 units (23.1%) • 2b: 61 units (58.6%) • 3b: 19 units (18.3%)
Ancillary Residential Floorspace	<ul style="list-style-type: none"> • West wing rooftop: 189sqm; • East wing rooftop: 161.5sqm; • First-floor podium space: 149sqm.
Play Space Provision	<ul style="list-style-type: none"> • 0-4 play space: 181sqm (100% of requirement); • 5-11 play space: 96sqm (80.7% of requirement). <p>All remaining play space requirements addressed through off-site provision.</p>
Wheelchair Homes	<p>10% M4(3) adaptable, with the remainder being M4(2).</p> <p>10 M4(3) wheelchair units.</p>
Commercial Units	2 commercial units along Park View Road, totalling 248sqm.
Heights	<p>Central Section: 8 storeys;</p> <p>West Wing: 7 storeys, dropping down to 2 storeys;</p> <p>East Wing: 7 storeys, dropping down to 5 storeys.</p> <p>Top 2 mansard floors across the building are recessed to reduce massing.</p>

TABLE 4: PROPOSED DEVELOPMENT OVERVIEW	
Car Parking	<p>Essentially car-free.</p> <p><u>Residential:</u> 8 disabled car parking spaces (2 on-street, 6 off-street).</p> <p><u>Stadium & Commercial Uses:</u> No car parking; during stadium/community events where parking capacity is exceeded, 100 spaces will be used from the nearby Learning & Enterprise College.</p> <p><u>Other:</u> 2 x car club spaces.</p>
Cycle Parking	<p><u>Residential:</u> 202 long-stay spaces</p> <p><u>Commercial:</u> 5 long-stay spaces</p> <p><u>Stadium:</u> 75 spaces</p> <p><u>Short-Stay:</u> 6 spaces (3 Sheffield hoops on Park View Road)</p>
Urban Greening Factor	<p>UGF score of 0.136. UGF score of 0.328 (when excluding 3G pitch).</p>
Energy	<p>Residential units will benefit from a communal ASHP system to provide heating and hot water, supplied to the dwellings via HIUs. Roof mounted photovoltaic panels will be used to generate a portion of the electricity demand.</p> <p>Heating and cooling will be provided to the commercial spaces via efficient individual split VRV systems</p>

Proposed Building

- 4.3 The proposed building is formed of four blocks in a u-shaped arrangement, with two wings and a central section broken into two blocks running parallel to Park View Road.
- 4.4 The proposed development will reach up to 8 storeys in height on the central section of the building, but has been carefully designed to step down to better respond to neighbouring buildings, as well as to reduce the appearance of scale and mass. The West Wing will drop to 2 storeys at its lowest southern point, and the East Wing will step down to 5 storeys to the south.

- 4.5 The proposals have been designed using a mansion house concept, and has a tripartite classic par-tee with a clear top, middle and base with particular attention paid to providing a strong and characterful roof form, so as to reduce the vertical mass and visual bulk.
- 4.6 The building is primarily comprised of red brick, with an aluminium anodised seam roof and dormers, both of which are light bronze coloured. Brown bricks dominate the ground floor of the building, and red ceramic bricks, matching Welling United FC's colours, compound the ground and first floor elevations, helping to ground the proposals in the site's history, and create a clear sense of connection between the residential and football elements of the development.
- 4.7 Significant greening is proposed to soften the building's appearance and meet sustainability objectives. Green roofs have been maximised on the building's rooftop, as well as extensive planting to rooftop amenity space and green walls/climbers to the rear of the building.

Residential Element

- 4.8 The proposed mix of units is as follows:
- 1-bed units: 24 units (23.1%)
 - 2-bed units: 61 units (58.6%)
 - 3-bed units: 19 units (18.3%)
- 4.9 All proposed units will be market housing, and no affordable housing is proposed due to financial constraints surrounding the delivery of the new stadium and facilities. This is dealt with in further detail below and in the accompanying Financial Viability Assessment Report.
- 4.10 All proposed units will comply with Nationally Described Space Standards, and have access to private amenity space in line with London Plan standards. 10% of proposed units (10 units) will be M4(3) wheelchair adaptable, with the remainder of units being M4(2) compliant.
- 4.11 A Fire Statement has been submitted as part of this application which demonstrates that the proposals will be acceptable in terms of fire safety. The proposals have ensured each core has access to a secondary staircase, thereby complying with emerging fire regulation requirements and future-proofing the fire safety of residents.
- 4.12 The proposal includes additional amenity space on the west wing rooftop (189sqm), east wing rooftop (161.5sqm) and first-floor podium space (149sqm). Of these amenity spaces, the current breakdown of uses is as follows:

- West Wing Rooftop:
 - Communal Amenity: 110sqm
 - 0-4 Play Space: 47sqm
 - 5-11 Play Space: 32sqm
 - TOTAL: 189sqm

- East Wing Rooftop:
 - Communal Amenity: 112.5sqm
 - 0-4 Play Space: 30sqm
 - 5-11 Play Space: 19sqm
 - TOTAL: 161.5sqm

- First-Floor Space:
 - 0-4 Play Space: 104sqm
 - 5-11 Play Space: 45sqm
 - TOTAL: 149sqm

Replacement Stadium

- 4.13 As part of the proposed development, a new stadium, 3G pitch and associated footballing facilities will be provided to Welling United FC, which will be funded by the residential element and therefore at no cost to the club.
- 4.14 The existing facilities are in a very poor state of repair, as pictured in the accompanying design document. The changing rooms are inadequate for purposes, there are leakages due to the state of the roof, and there is little scope to improve the facilities due to income constraints. Additionally, the current facilities and grass pitch significantly limit opportunities for the wider teams within the Welling FC umbrella to play and train on-site.
- 4.15 Without the redevelopment of the site, the club will not be able to maintain itself financially and will therefore cease to operate, which in-turn will result in the loss of various initiatives which benefit the local community significantly; there is therefore an acute need for the site to be rejuvenated to enable the club to grow and maintain itself, which must be delivered through redevelopment of the site, due to financial circumstances.
- 4.16 To address these issues, a comprehensive redevelopment of WUFC's facilities is proposed to ensure the long-term vitality and viability of the football club, and ensure that this important local institution is retained in the long term. The proposed rejuvenation of WUFC's facilities will also

enable the club to widen its community offer and therefore generate further benefits to the local population, and further ingrain the club in the local fabric and community.

4.17 The proposals will demolish all stands except the Erith & Belvedere stand and multi-purpose hall and ancillary accommodation. New and improved stands will be provided on all sides of the pitch, providing a total capacity of 4,044 spectators, comprising 2,600 standing and 1,414 seating (including 30 disabled seats). The proposed capacity is broadly in line with the existing stadium.

4.18 As part of the proposals, the following high-quality stadium/football facilities will be provided to replace existing facilities lost to redevelopment:

- Club offices;
- Club bar;
- Club shop/ticket office;
- Home & away changing rooms;
- Male & female official changing rooms;
- Club kitchen;
- Hospitality rooms / VIP rooms / classrooms (flexible use rooms);
- Food stall;
- First aid room;
- Physiotherapy room;
- 3 x public toilets (men & women);
- Equipment storage
- Cycle parking; and
- Club refuse & plant rooms.

4.19 Access to the stadium will be entirely independent from the residential element. Spectators will access the stadium via two separate entrances along Park View Road, providing 5 turnstiles each. This enables segregated home and away access, as required.

4.20 Ambulance parking for emergencies will be provided off-street within the residential parking area, and accessed via Roseacre Road.

Commercial Element

4.21 Two commercial units (Class E) not associated with the football stadium use will be delivered along the Park View Road frontage, totalling 251sqm (GIA). Extensive glazing will be used to

activate the frontage and enable views into the units, thereby improving the streetscene. One of the commercial spaces is also located at the corner of Park View Road and Roseacre Road, thereby activating this prominent corner of the site.

Other Matters

- 4.22 The public footway to the north of the site, along Park View Road, will be widened by 1m, and the carriageway fronting the site will also be narrowed by 1m, so as to afford more space for pedestrians and visitors to employ the site. This will result in an overall widening to the footway of circa 2m, resulting in a footway approximately 5m wide across most of the site, compared to the existing 3m prevailing width.
- 4.23 As part of the widening works, new paving flags and permeable paving will be delivered, alongside short-stay Sheffield spaces and new planting.
- 4.24 A total of 202 long-stay residential cycle parking spaces will be delivered in the basement, in line with policy. In addition, 5 long-stay spaces will be provided for commercial uses, and 75 spaces will be delivered for the stadium. 6 short-stay cycle parking spaces are provided in the public realm, in the form of 3 Sheffield stands.
- 4.25 The proposed development is essentially car-free. 8 disabled car parking spaces will be provided for the residential element of the scheme; of these eight spaces, 6 will be on-site, accessed via Roseacre Road, whilst 2 additional spaces will be located on-street, on Roseacre Road. No car parking will be provided for the commercial and football stadium uses.
- 4.26 One on-street car club space will be provided as part of the scheme. This is currently proposed at Denham Close, opposite the site across Park View Road.
- 4.27 A new servicing bay will be provided on Park View Road, adjacent to the frontage of the football stadium. This will enable servicing vehicles to stop temporarily while they unload and prevent conflict with other traffic.
- 4.28 The existing bus stop and shelter located on Park View Road adjacent to the football stadium will be retained in its existing location. It is envisaged that the bus shelter will be relocated to the rear of the footway to aid pedestrian movement, which will be addressed in detail as part of any Section 278 agreement. It is envisaged that the bay will operate as 'Loading Only' with a limit on the maximum duration of stay (potentially 30 minutes). This will aid in ensuring turnover of the space to maximise usage for both the residential flats and the football stadium.

- 4.29 The pedestrian refuge island along Park View Road will be relocated to the west so as to facilitate the use of Park View Road. The existing cycle path along Park View Road will also be retained.
- 4.30 Residential units will benefit from a communal ASHP system to provide heating and hot water, supplied to the dwellings via HIUs. Roof mounted photovoltaic panels will be used to generate a portion of the electricity demand. Heating and cooling will be provided to the commercial spaces via efficient individual split VRV systems.
- 4.31 Further detail is provided in the accompanying Design and Access Statement and drawings, prepared by Create Design.

5 PLANNING POLICY CONTEXT

5.1 This section of the Planning Statement summarises the Development Plan Documents and material considerations relevant to the Proposed Development.

A. THE DEVELOPMENT PLAN

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, and section 70(2) of the Town and Country Planning Act 1990, states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.3 The relevant Development Plan Documents are as follows:

- London Plan (March 2021);
- Bexley Local Plan (April 2023).

5.4 Other material considerations include:

- The National Planning Policy Framework (2023);
- National Planning Policy Guidance;
- Housing Design Standards LPG (2023)'
- Draft Fire Safety LPG (2022);
- Urban Greening Factor LPG (2023);
- The Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012);
- London Cycle Design Standards (2014);
- Air Quality Neutral LPG (2023);
- 'Be Seen' Energy Monitoring Guidance LPG (2021);
- The Mayor's Guidance on Preparing Energy Assessments (2022);
- Circular Economy Statements LPG (2022);
- Whole Life Carbon LPG (2022);
- Design for living - Bexley's residential design guide SPD (2006);
- Planning Obligations Guidance SPD (2008); and
- Sustainable design and construction guide SPD (2007).

5.5 Other SPG/SPD documents and design related guidance documents may also be relevant and have been used by the project architect and consultant team. These are referred to, where relevant, in other documents submitted as part of this Planning Application.

B. SITE DESIGNATIONS

i. Application Site

5.6 Under the adopted Policies Map, the site falls within the following designations:

- Metropolitan Open Land.

5.7 The site is also within Flood Zone 1, and has a PTAL of 3 at its highest point (to the north).

ii. Surrounding Area

5.8 Whilst the site falls within Metropolitan Open Land, this designation is as part of the wider Danson Park which abuts the site to the immediate south. To the immediate west and north of the site, Metropolitan Open Land terminates and the adjoining land is designated as a Sustainable Development Location and a Primarily Residential Area.

5.9 Welling Town Centre is located approximately 250m to the west of the site, along Park View Road.

5.10 Danson Park is also designated as a Borough Grade 1 Site of Importance to Nature Conservation.

5.11 A Local Protected View to Shooters Hill Water Tower runs along Park View Road, and runs along the site's northern boundary.

C. KEY PLANNING CONSIDERATIONS

5.12 The key determining issues in considering this Application are as follow:

- Principle of Residential Development;
- Commercial Floorspace;
- Principle of Football Club Development;
- MOL & Very Special Circumstances;
- Design;
- Heritage, MOL & Archaeology;
- Affordable Housing & Financial Viability;
- Housing Mix;

- Housing Quality;
- Neighbouring Amenity;
- Transport, Access & Servicing;
- Car & Cycle Parking;
- Energy & Sustainability;
- Biodiversity, Ecology & Trees;
- Flood Risk & Drainage;
- Air Quality;
- Fire Safety;
- Utilities;
- Contamination; and
- Planning Benefits and Balance.

5.13 The Proposed Development is considered against each of these matters in Section 6 of this Planning Statement.

6 PLANNING CONSIDERATIONS

6.1 This section of the Planning Statement considers, in turn, the key planning issues relating to the Proposed Development. Where relevant, it draws upon the wider suite of supporting technical reports in considering the other development management and environmental considerations relevant to the Proposed Development.

6.2 A summary of the analysis and conclusions associated with each matter, along with an assessment of the compliance with the policies of the adopted Development Plan and other relevant material considerations, is set out below.

A. PRINCIPLE OF RESIDENTIAL DEVELOPMENT

6.3 LBB has a housing target of 6,850 new homes from 2019/20 to 2028/29, as per London Plan Table 4.1. The Housing Delivery Test results by Central Government (January 2022), whilst outdated, also highlight that LBB only delivered 93% of their target number of homes required.

6.4 Policy H1 in the London Plan seeks to optimise housing delivery on surplus land with a PTAL of 3-6.

6.5 Policy SP1 of the LBB Local Plan seeks to protect and enhance the natural and built environment by focussing new development on urban, brownfield sites in accessible locations. The Policy also notes that growth will be focused in Sustainable Development Locations, but states that proposals outside of these areas will be supported where they comply with Development Plan policies.

6.6 Policy SP2 of the LBB Local Plan seeks to meet the Mayor's 10-year (2019-2029) housing target for Bexley of 6,850 (net) new homes and, subject to any review of the London Plan, provide for at least 6,165 (net) new homes for the remainder of the plan period between 2030 and 2038. The Policy further states that a greater number of homes will be supported, subject to compliance with all relevant Development Plan policies.

6.7 Policy SP2 of the LBB Local Plan further supports sensitive residential intensification outside of Sustainable Development Locations subject to compliance with Development Plan policies.

6.8 Whilst the site is not within a designation identified for additional residential development, nor allocated in the LBB Local Plan, it primarily has a PTAL of 3, abuts the Sustainable Development

Location and Primarily Residential Area, and is therefore considered to be in a broad location which supports residential uses.

- 6.9 Over the course of pre-application discussions, both Bexley and the GLA have been supportive of the principle of residential redevelopment of the site, subject to a suitable 'very special circumstances' case being made. The very special circumstances case is elaborated upon further below and in Appendix 1, and it considered that a suitable case has been made, and consequently the principle of residential development is acceptable.
- 6.10 The redevelopment of this Site provides an opportunity to deliver significant benefits for Bexley by delivering new homes to address unmet demand, and is therefore considered good growth, in line with the local, regional and national planning policy.
- 6.11 Whilst the presumption in favour of sustainable development does not apply in this instance, an overview of the economic, social and environmental benefits of the scheme is set out below, to demonstrate that the proposed development is considered to constitute sustainable development. Further detail is provided below in respect of these matters:
- *Economic:* effective use of existing brownfield land; improvement and long-term wellbeing/security of a key local institution (WUFC), bringing long-term economic opportunities on the site and for the locality; new high-quality commercial spaces to replace the existing poor-quality units; local training and employment opportunities; CIL and S106 contributions to help deliver key infrastructure;
 - *Social:* improvement and long-term wellbeing/security of a key local institution (WUFC); improved multi-functional space, enabling further opportunities for community uses and charitable initiatives; a significant number of new homes, including family homes, to meet the need of present and future generations; high-quality development which will improve the character of the local area, create a stronger active frontage, improve the public realm and improve safety and the feeling of safety; CIL and S106 contributions to help deliver key infrastructure;
 - *Environmental:* effective use of existing brownfield land; sustainability and energy strategy which meets policy requirements; improvement on biodiversity net gain and urban greening; car-free development to minimise pollution and traffic impacts; minimised waste and pollution impacts, having consideration towards circular economy and whole life carbon; careful consideration and protection of the natural, built and historic environment; CIL and S106 contributions to help deliver key infrastructure.

B. COMMERCIAL FLOORSPACE

- 6.12 LBB Local Plan Policies seek to safeguard against loss of commercial floorspace in designated employment zones, as well as town centres, but does not include any similar provisions for sites outside of these designations. The London Plan also has the same position.
- 6.13 The proposals will reprovide 248sqm of commercial floorspace, in two high-quality commercial units along Park View Road, providing active frontage and a significant improvement on the existing arrangements. Existing tenants have been consulted as part of the design evolution and Unit 1, at the corner of Park View Road and Roseacre Road, is intended as a pre-let for the existing tenant (All Pro Security) at the site.
- 6.14 Given the site is not in a sequentially preferable location for town centre uses, the proposals have not sought to markedly increase the quantum of commercial floorspace, and the proposed units essentially serve as replacement floorspace. The proposed commercial spaces do not trigger the threshold for Retail Impact Assessments or Sequential Assessments, as confirmed by officers during pre-application discussions.

C. PRINCIPLE OF FOOTBALL CLUB DEVELOPMENT

- 6.15 London Plan Policy S5 encourages development that enhances the provision of sporting facilities and states that developments should enhance provision of facilities in accessible locations, well-connected by public transport, as well as maximising the multi-use of facilities, encouraging the co-location of services between providers, schools, colleges, universities and other community facilities. Paragraph 5.5.5 of the London Plan acknowledges that specialist sporting venues and stadiums also have a role to play in providing facilities and enabling wider access to sport as well as having an important cultural value. Policy HC5 supports the enhancement of London's cultural venues.
- 6.16 Policy SP1 of the LBB Local Plan seeks to strengthen and diversify the local economy by improving access to jobs in Bexley, London and the wider south east.
- 6.17 Policy SP3 of the LBB Local Plan states that Bexley will continue to play a key role in contributing to London's economic growth and prosperity, and supports the economic growth of at least 10,800 (net) new jobs over the plan period. The Policy further seeks to increase employment densities and provide higher employment densities in well-connected locations.
- 6.18 LBB Local Plan Policy DP15 states that proposals for new social and community infrastructure or for the enhancement or expansion of existing infrastructure will generally be supported,

particularly the provision of health, physical activity, leisure, education and children and young people's facilities. In all cases, proposals should be:

- sustainably located, ideally close to the local community the facility is intended to serve, or within areas of good access to public transport, such as Town Centres, particularly where the proposal is likely to generate a significant volume of traffic;
- easily accessible to all by a range of sustainable travel modes, including walking, cycling and public transport;
- of an appropriate character, size and scale to meet the needs of the community; and
- designed to be as flexible, adaptable and capable of multi-use as possible.

6.19 Given the site is currently used as WUFC's stadium, it is considered that the principle of continued use of the site for this purpose is supported. This also aligns with uses deemed suitable for Metropolitan Open Land, as they seek to retain outdoor sports uses in these locations.

6.20 It should also be noted that the WUFC ground was assessed as part of the Council's Green Infrastructure Study (Appendix J Playing Pitch Audit – Sport Specific Action Plan). The site is listed as one of the key football sites in the borough where future investment in sustaining or enhancing quality needs to be focused. It is also listed as one of the priority sites for pitch improvements and improvements to ancillary facilities. The protection and improvement of this site and its facilities is therefore supported by the Council, and has been confirmed during pre-application discussions.

6.21 As set out in Appendix 2 and further below in this note, Welling United FC are a key local institution, having been founded in 1963 and calling the Park View Road stadium its home since 1977. They have a strong local supporter base, and are regularly involved in local community initiatives and charitable partnerships. Appendix 2 of this Planning Statement sets out the club's history and involvement in local initiatives and organisations.

6.22 The existing facilities are in a very poor state of repair, as pictured in the accompanying Design and Access Statement. The changing rooms are inadequate for purposes, there are leakages due to the state of the roof, and there is little scope to improve the facilities due to income constraints.

6.23 The club has historically run at an operating loss, and consistently relied upon owner donations each season to survive financially and continue to function. The owner's forecast contribution for the current year is £460,000. Despite this, the Club is still operating at a loss, which is

forecast at £77,000 for the current financial year. The Club is also investing approximately £36,000 per annum just on maintaining the existing stadium and facilities.

6.24 There is therefore an acute need for the site to be rejuvenated to enable the club to grow and maintain itself, which must be delivered through redevelopment of the site, due to financial circumstances.

6.25 Additionally, the current facilities and grass pitch significantly limit opportunities for the wider teams within the Welling FC umbrella to play and train on-site; as a result, the numerous Academy, youth teams and other teams in the club are dispersed, and must rely on other pitches in the wider area.

6.26 The Academy are currently in the early stages of investigating a potential relocation to 176 Footscray Road SE9 2TF, the site of Eltham Town Football Club. This would enable the Academy to be more consolidated and avoid dispersion of their many teams; however, it is anticipated that the development of this site would not provide sufficient capacity for the entirety of the Academy, and therefore that some additional capacity will be required elsewhere, off-site.

6.27 Both LBB and the GLA have been supportive of the principle of redeveloping and enhancing WUFC's facilities at the site. In addition, relevant sports stakeholders, notably including Sport England, the London FA, Kent FA and Football Foundation, have been highly supportive of the proposed development (see Appendix 4 for stakeholder responses).

6.28 On this basis, it is therefore considered that the principle of stadium use of the site is acceptable.

D. MOL & VERY SPECIAL CIRCUMSTANCES

6.29 Paragraph 137 of the NPPF (2023) attaches great importance to Green Belts, and states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

6.30 Paragraph 138 of the NPPF further outlines that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.31 Paragraph 147 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 further outlines that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

6.32 In line with paragraphs 147 and 148 of the NPPF, London Plan Policies G2 and G3 advise that:

- MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt; and
- Development proposals that would harm the Green Belt should be refused except where very special circumstances exist.

6.33 London Plan Policy G3 further sets out the criteria for suitable MOL land, as follows:

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area.
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

6.34 As such, it is therefore necessary to demonstrate a very special circumstances case exists, and that the proposals do not conflict with the MOL criteria set out by London Plan Policy G3.

MOL & Green Belt Criteria

6.35 With regard to the site itself and the MOL criteria set out in London Plan Policy G3, the site is not considered to contribute to criteria 3 and 4; the site comprises a significant element of hardstanding and is not distinguishable from the built-up area, does not contain any features or landscape of value, and is physically and visually separated from Danson Park, and therefore does not form part of Danson Park's strategic importance as green infrastructure.

- 6.36 Whilst the site does meet criteria 2, it is important to note that its function as open-air leisure will continue and be intensified as part of the proposed development; the retention of Welling United FC's stadium is the key driver in this project, and therefore the site will better meet criteria 2 with the proposals in place.
- 6.37 A Townscape and Visual Impact Assessment ('TVIA') has been carried out. The TVIA assesses the potential landscape and visual effects of the proposed development on the surrounding landscape and visual receptors. The TVIA undertakes an assessment of MOL impacts and confirms the following:
- There will be a localised decline in visual openness due to the proposed residential building; however, the decline would be limited to a small area of the wider Danson Park MOL given the extensive tree cover to the south of the site, which screens this part of the MOL;
 - There will be a negligible decline against criteria 1 of the MOL (as per Policy G3) – whilst the proposed development would increase the amount of built form at the site, the existing facilities already exert an influence on the Danson Park MOL, and the proposed development would negligibly increase this effect.
- 6.38 It is also important to note that the proposals have been located on previously developed land. The existing site is comprised of hardstanding along its borders, with the northern border being particularly extensive (where the proposed building will be primarily located, along Park View Road). Additionally, the existing site houses the existing WUFC two-storey stand and clubhouse along its western boundary; the proposed WUFC club facilities are proposed to be relocated in this area, and within a two-storey building extending beyond the West Wing. As such, the proposals will not be built on greenfield, and have been carefully positioned to minimise impacts.
- 6.39 On this basis, it is therefore considered that the proposals will retain the criteria for suitable MOL land, whilst simultaneously minimising any impacts on wider MOL land, and is therefore considered acceptable in terms of its impacts to MOL suitability/criteria.
- 6.40 Furthermore, with regard to the Green Belt criteria set out in paragraph 138 of the NPPF, the proposals would not conflict with these purposes as follows:
- a) *Urban Sprawl*: the site primarily consists of previously developed land and is firmly set within an urban area; as such, development of the site would not result in urban sprawl;
 - b) *Merging of Towns*: the site primarily consists of previously developed land and is firmly set within an urban area; as such, development of the site would not result in the merging of towns;

- c) *Encroachment into Countryside*: the site is not located in the countryside, and would therefore not result in encroachment into the countryside;
- d) *Preserving Historic Towns*: the site is not located in close proximity to any historic towns; the accompanying Heritage Statement confirms that the proposals are not considered to have any unacceptable impacts on neighbouring heritage assets (further detail is provided below);
- e) *Urban Regeneration*: the site is considered to consist primarily of previously developed land; The existing site is comprised of hardstanding along its borders, with the northern border being particularly extensive (where the proposed building will be primarily located, along Park View Road). Additionally, the existing site houses the existing WUFC two-storey stand and clubhouse along its western boundary. The proposed development will be located on these parts of the site.

6.41 The proposed development is therefore also considered not to conflict with the Green Belt purposes in the NPPF.

6.42 On this basis, the proposed development is considered to align with, and therefore protect, both the MOL and Green Belt purposes.

Very Special Circumstances

6.43 A very special circumstances (VSC) case has been set out in Appendix 1 of this Planning Statement. The assessment comprises two elements: an overall VSC case for the entire development, as well as a VSC case relating specifically to the stadium and WUFC's operations and consequent benefits.

6.44 As noted above, without the redevelopment of the site, the club will not be able to maintain itself financially and will therefore cease to operate, which in-turn will result in the loss of these various initiatives which benefit the local community significantly; in addition, the proposals will enable the club to widen its community offer and therefore generate further public benefits, whilst further ingraining the club in the local fabric and reinforcing it as an important local institution.

6.45 A timeline of Welling FC's key community engagement and charitable initiatives has been submitted as part of this pre-application request, and is enclosed in Appendix 2. This illustrates the wide-ranging and important role the club plays in the local community, including the following:

- Hard ball court initiative in Welling to help reduce anti-social behaviour, in which 200 local youths took part in.

- Establishment of the Welling Academy and Scholarship programme in 2017, which now counts 1,300 participants in all programmes for boys and girls from 5 to 19 years old.
- Partnership with MIND since 2018, helping raise awareness for young men's mental health and bringing in over £25,000 for the charity through a charity football match.
- Partnership with Age Concern UK in 2019 to set up coffee mornings and activities for the elderly, bringing in over 100 local elderly residents to the clubhouse facility.
- Creation of the Welling United Business Club and Women's Business Club in 2022, which have over 40 members and reinforce Welling United as a hub for local businesses.
- Partnership with Chartwell Childrens Cancer Trust since 2022, having raised £5,000 to-date.
- Partnership with McDonalds in 2023, delivering over 20,000 free tickets to local primary and secondary schools, football clubs, and charity organisations.
- Partnership with National League Trust, which has resulted in delivering projects in 8 local primary schools, including the Wings Wellness programme educating children in sport-related activity and eating habits.

6.46 The key benefits of the Proposed Development, as elaborated upon in Appendix 1, include:

- New high-quality facilities for Welling FC to safeguarding their long-term future as a football club and provider of community services. The facilities will enable the club to run 7 days a week, thereby enabling the club to run sustainably, without owner or supporter donations; key facilities are:
 - A 3G astro turf pitch, thereby enabling use throughout the week.
 - New bar, café, club shop and ticket office for the fans, and generating additional revenue for the club.
 - New changing rooms, officials' rooms, physiotherapy room, storage rooms, function rooms, and club offices, amongst others.
 - On-site classrooms for academy/apprenticeship teams, bringing existing teams onto the site. Opportunity to increase the number of youth teams as a result, in tandem with the Academy's potential relocation.
- Improved stadium stands to further expand and generate matchday revenue and growth, ensuring the long-term viability of the football club, and providing greater opportunities for the local community to engage. Opportunity to increase capacity to 5,000 if the club secures promotion, thereby meeting FA requirements and future-proofing the club to move to the next echelon without requiring any significant work.
- Indicative pitch/stadium schedule of 57 hours a week, greatly improving opportunities for the local community to engage with and use the site (compared with the existing 10 hours a week for the grass pitch). Targeted community initiatives include:

- Use for local schools to be arranged, free-of-charge, during working hours. School cup finals and other annual tournaments can take place at the site.
- Holiday activities organised by the Football in the Community team will ensure children and teenagers are positively occupied outside of term time. Football camps, Girls development initiatives, summer camps and wider events will be possible on the new 3G astroturf pitch.
- Targeted initiatives with key local/football groups including LB Bexley Youth Services; MAN v FAT; Premier League Girls; Kick it Out; Show Racism the Red Card; EFL Trust; Frame Football; Spirit of Football; and Weetabix Wildcats.
- Greater possibility of hosting community events, and extended hours where this can be facilitated. Opportunities for larger-scale events with local/national organisations.
- New Astro pitch and function rooms to be integrated into the wider community engagement programme, given it can be used more frequently/extensively.
- New walking football and wheelchair football initiatives to come forward
- Growth of the football club and Academy, estimated as follows:
 - +30/40 senior players;
 - Potential future growth to:
 - over 100 youth teams across all ages and genders; and
 - over 300 students in the Academy.
- Reduced stress on existing football/grass pitches within the Borough and the wider surrounding area, thereby helping alleviate existing capacity constraints. New pitch will also help meet an identified need within Bexley's Green Infrastructure Study (Appendix J Playing Pitch Audit – Sport Specific Action Plan).
- Improved disabled access to/from the stadium, thereby increasing opportunity to engage.
- Delivery of new much-needed homes and family units.
- High architectural quality and design, which will improve local townscape.
- Improved public highways arrangements along Park View Road, helping to improve safety and reduce congestion whilst providing suitable servicing and delivery arrangements.
- Temporary construction and permanent jobs, as well as opportunities for apprenticeships and training. General socio-economic benefits generated by the scheme, as set out in the socio-economic infographic enclosed in Appendix 5 of this Planning Statement.
- Significant financial contributions in the form of CIL and S106 obligations, which can/will be used to secure improvements to the site and wider locality.
- Greatly-improved, policy-compliant energy and sustainability strategy for the proposals, helping to reduce emissions and improving its environmental friendliness.
- Improved floodlighting arrangements, helping to reduce impacts on local residents and surrounding wildlife.

- High-quality drainage strategy to reduce potential flood risks and better the site.
- Urban Greening Factor and Biodiversity Net Gain, improving on the existing site.

6.47 As outlined in the case, the harm is considered to be very limited. Conversely, the public benefits package is considered to be significant, and to vastly outweigh the harm generated. The key driver for this proposed development is the re-provision of Welling FC facilities to safeguard this key community asset, and the proposals will generate significant benefits through the replacement of local community facilities falling into disrepair with new high-quality facilities for community use, thereby ensuring the long-term viability of Welling United FC.

6.48 Additionally, as part of the VSC exercise, an assessment of alternative sites (enclosed in Appendix 3) has been undertaken, which demonstrates that there are no suitable sites in close proximity.

6.49 Finally, as addressed below and in the accompanying Financial Viability Assessment Report, the scheme proposes the minimum quantum of development required in order to make the scheme financially viable and as such the scale of the development is considered to be fully justified from a financial perspective, and required to enable the proposed enhancements to the football club.

6.50 As such, this is considered to constitute very special circumstances, in accordance with London Plan Policies G2 and G3. The proposals are also considered to have an acceptable impact on the MOL, whilst retaining the criteria for suitable MOL. An assessment of alternative sites has also been undertaken, which demonstrates that no suitable alternative sites are available in proximity.

Pitch Usage & Maintenance

6.51 As noted above, the indicative pitch use has been identified as 57 hours, broken down as follows:

- *Men's Team*: 7 hours;
- *Women's Team*: 7 hours;
- *Youth Teams*: 10 hours;
- *Academy*: 12 hours; and
- *Community Use*: 21 hours.

- 6.52 The exact pitch usage and breakdown can be confirmed via condition and/or legal obligation attached to the grant of planning permission; this will help firm up an acceptable schedule once there is greater clarity on interest parties.
- 6.53 As confirmed from pitch specifications and through liaison with the relevant FA stakeholders, it is evident that the lifespan of a 3G football pitch is proportionate to the amount of usage it is subjected to; for example, for a pitch to last 10 years, then there should be approximately 20 hours usage per week. Increased usage beyond the indicative 20 hours a week is commonplace, and in other examples where usage is up to 50-60+ hours a week, clubs will budget for a pitch replacement in a reduced time period.
- 6.54 In this instance, it is therefore clear that the pitch will need to be replaced in a few years' time, with the exact time depending on monitoring of its state of repair. As evidenced from the financial information and cashflow forecasts enclosed within the accompanying Financial Viability Assessment Report, the club will no longer be operating at a loss, and it is expected that a positive net cashflow is produced in the first year of operation. As such, it is considered that the club will be able to finance a replacement pitch at a later date, through money generated from its operation.

E. DESIGN

- 6.55 London Plan Policies GG2 and D3 seek to apply a design-led approach to determine the optimum development capacity of sites and recognise that higher density developments should generally be in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. Furthermore, London Plan Policy D4 emphasises the importance of undertaking Design Review/Scrutiny prior to submission and utilising visual models and assessment to analyse potential options and development proposals.
- 6.56 London Plan Policy D4 states that 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.
- 6.57 London Plan Policy D9 states that boroughs should determine locations suitable for tall buildings. Policy D9C goes on to highlight the need to fully take account of the potential visual impact, functional impact, environmental impact, and cumulative impact of tall buildings in the decision-making process.

- 6.58 Policy SP5 of the LBB Local Plan states that design should respect the existing character and context but need not be constrained by what already exists; local character evolves over time. The Policy further seeks to ensure that:
- 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;
 - 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,
 - design considers the relationships between building and spaces, including its contribution to and shaping of the public realm.
- 6.59 LBB Local Plan Policy DP11 states that, irrespective of location, all development proposals for new buildings, extensions and alterations, conversions, changes of use and public and private spaces will be expected to:
- ensure that the layout, height, scale and massing, façade treatment, and materials are complimentary to the surrounding area contribute positively to the street scene;
 - provide a high standard of landscaping design, appropriate to the proposal and with regard to the character of the surrounding area; and
 - apply the principles of designing out crime whilst maintaining an attractive, connected environment.
- 6.60 Policy DP12 of the Bexley Local Plan states that the proposed heights for buildings should reflect other design and policy requirements, including the requirement to have regard to the existing or emerging character and context of the area.
- 6.61 Policy DP12 further notes that the maximum height of buildings shall not normally be more than:
- 45 metres within and near the town centres of Abbey Wood Village and Lower Belvedere, as set out in Part 5 of this policy;
 - 25 metres within the borough's identified Sustainable Development Locations, Strategic Industrial Locations (SIL), and the Thamesmead and Abbey Wood London Plan Opportunity Area not covered by Part 2a of this policy; and,
 - 15 metres across the rest of the borough (our emphasis).
- 6.62 Policy DP12 states that tall buildings in Bexley are considered to be more than 25 metres in height and must comply with the tall buildings policy in the London Plan. In addition, the applicant must demonstrate that:
- there is sufficient access to public transport;

- there is access to local services and facilities, depending on the number and type of residents expected;
- the proposal will not have an unacceptable adverse impact on local character, including heritage assets;
- the design considers topography;
- the proposal will not create unacceptable adverse environmental impacts, including flood risk, creation of a wind tunnel, loss or lack of daylight and sunlight;
- the design is of high architectural quality; and
- the proposal will integrate into its surroundings at all levels, particularly at street level and into the skyline.

6.63 LBB Local Plan Policy DP12 states that development proposals with the potential to impact a Local Protected View must meet the following criteria:

- Development in the foreground and middle ground of a protected view should not be overly intrusive, unsightly or prominent to the detriment of the view;
- Development in the background of a protected view should give context to landmarks and not harm the composition of the view as a whole; and,
- Any existing or proposed viewing places within the development should be accessible and managed so that they enhance people's experience of the protected view.

6.64 Policy DP12 further outlines that, for development proposals that include buildings taller than 15 metres, applicants must submit design appraisals with alternative options to demonstrate whether similar densities can be achieved using more traditional and human-scaled typologies including terraced housing, maisonettes, and courtyard apartments.

6.65 Policy DP21 of the LBB Local Plan requires proposals to provide a high standard of landscape design, having regard to the well-being, water, wildlife and character of the surrounding area, ensuring sustainable planting for the long term and be supported by appropriate management and maintenance measures.

Design-Led Approach

6.66 The proposed development has adopted a design-led approach to the redevelopment of the site which has enabled the applicant to commit to delivering the new WUFC facilities free of cost to the club, thereby enabling the club to continue operating in the long-term in a sustainable manner.

- 6.67 Whilst the proposals are of a greater scale and mass than surrounding built form, this is due to the need to balance viability issues in delivering the football elements. However, attention has been paid in design development to responding as best as possible to surrounding context, so as to deliver a scheme which simultaneously stands as a high-quality landmark building, but also includes familiar design elements which ground the scheme in the locality.
- 6.68 As required by Policy DP21 of the LBB Local Plan, alternative design typologies were considered in the design development; ultimately, however, given the need to provide suitable space and facilities for WUFC, along with the financial constraints associated with delivering this without costing the club, no other typologies would be able to deliver the quantum necessary to create a financially-viable scheme.
- 6.69 The proposed development has been subject to extensive pre-application discussions with Council officers, as well as GLA officers, and has been subject to a Design Review Panel. These stakeholders have not raised concerns with the principle of a flatted development, with design comments primarily focusing on scale, massing and architectural detail.
- 6.70 On this basis, it is considered that a design-led approach has been taken to optimise the site, and that the proposals make the best use of previously developed land. Further detail on design matters is provided in-turn below to expand on this.

Layout

- 6.71 The proposed building has been located on the northern boundary of the site, thereby positioning the built form as far away from Danson Park and the wider MOL, and creating an inviting and active street frontage, which brings further activity, vibrancy and a feeling of safety along this portion of Park View Road.
- 6.72 The building is formed of four blocks in a u-shaped arrangement, with two wings and a central section broken into two blocks running parallel to Park View Road. This arrangement allows development quantum to be maximised without increasing height, whilst also providing a high proportion of dual-aspect, high-quality dwellings.
- 6.73 The layout and positioning of the proposed building is considered to be optimal in light of the site circumstances and the nature of the proposed development.

Height

- 6.74 The proposed building is just under 26m high. In line with London Plan and LBB policy, the proposals are therefore considered to be a tall building.
- 6.75 Whilst the proposed development is not within a tall building location or a sustainable development location, the site abuts a Sustainable Development Location and is in essence only omitted from this designation by virtue of its MOL designation.
- 6.76 As such, it is therefore considered that the site can, in principle, accommodate a building up to 25m, in line with the guidance set out in LBB Policy DP12.
- 6.77 Nevertheless, given the site is not in a Sustainable Development Location, an assessment of the proposed development has been undertaken in line with the requirements of London Plan Policy DP9C):

Conformity with London Plan Policy D9 Part C	
London Plan Policy D9 Part C	Assessment of Conformity
<p>Visual impacts</p> <p>a) the views of buildings from different distances:</p> <ul style="list-style-type: none"> <i>i.</i> long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views <i>ii.</i> mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality. <i>iii.</i> immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. 	<p><u>Viewpoints:</u></p> <p>The submitted Townscape and Visual Impact Assessment determines that the proposed development would have largely adverse effects limited to the townscape character of the site and the views afforded to nearby recreational, residential and highways receptors.</p> <p>However, the largest effect is felt within the site and adjacent to the site due to the permanence and extent of change, combined with the footprint of development.</p> <p>Lesser effects (moderate adverse to negligible adverse) would be felt indirectly in the townscape during the long-term and permanent duration of the proposed development.</p> <p>The presence of tree cover around the site and in the wider landscape, as well as the built form, limits important effects on townscape character and visual amenity to the immediate surroundings</p>

Conformity with London Plan Policy D9 Part C	
London Plan Policy D9 Part C	Assessment of Conformity
<p>b) whether part of a group or stand alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.</p> <p>c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.</p> <p>d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.</p> <p>e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.</p> <p>f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.</p> <p>g) buildings should not cause adverse reflected glare.</p> <p>h) buildings should be designed to minimise light pollution from internal and external lighting.</p>	<p>of the site. Views from further afield are typically obscured by intervening built form and/or vegetation.</p> <p>It is important to note the nature of this scheme as a stadium redevelopment, however, and therefore the intrinsic scale of development required.</p> <p><u>Legibility & Wayfinding:</u> Whilst the proposed development does not follow the broad spatial hierarchy of heights, this is primarily due to the unique nature of the proposals as a stadium redevelopment scheme with enabling residential development, which will allow the new WUFC facilities to be delivered free-of-charge. Nevertheless, the proposals have been carefully designed to serve as a landmark announcing the entrance to Welling town centre, and will provide a key wayfinding element along Park View Road.</p> <p><u>Architectural Quality:</u> The highest level of architectural quality and materials are proposed for the scheme, with the proposals seeking to create a landmark scheme, but which includes elements reflecting the character of the wider area. Further detail is provided in the 'Appearance & Materiality' subsection below.</p> <p><u>Heritage Impacts:</u> The submitted Heritage Statement determines that impacts to the heritage assets within the surrounding area are negligible, with 'No Harm' perceived to any of the designated heritage assets within the surrounding area, and consequently no mitigation or recommendations are required. On this basis, the proposed development is therefore considered to be acceptable in heritage terms.</p> <p><u>Light Pollution:</u></p>

Conformity with London Plan Policy D9 Part C	
London Plan Policy D9 Part C	Assessment of Conformity
	<p>As set out in the submitted Lighting Assessment, the proposed lighting will have a beneficial impact on neighbouring residents, as it will improve light spillover to these properties.</p> <p>Further detail in respect of light pollution can be suitably secured via condition.</p>
<p>London Plan Policy D9 Part C: functional impacts</p> <p>a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.</p> <p>b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.</p> <p>c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.</p> <p>d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.</p> <p>e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area.</p> <p>f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</p>	<p><u>Safety of Occupants</u></p> <p>A Fire Statement has been submitted as part of this application which demonstrates that the proposals will be acceptable in terms of fire safety. The proposals have ensured each core has access to a secondary staircase, thereby complying with emerging fire regulation requirements and future-proofing the fire safety of residents.</p> <p>Level access will be provided to all buildings, and communal circulation spaces will be usable by mobility-impaired residents and visitors. Safe and secure access to the development will be provided across the site.</p> <p>The proposed development has also been carefully designed to maximise natural/ passive surveillance and active frontages, thereby further increasing the feeling of safety for occupants and the wider public.</p> <p><u>Servicing & Maintenance</u></p> <p>Servicing and maintenance has been considered at the outset of the development, with the appointed transport consultant, Motion, being present at the majority of pre-application meetings and having extensive discussions with the Council's Highways officer.</p> <p>The proposals will result in an improved servicing and maintenance arrangement over the existing site. A new refuse, loading and servicing bay is proposed along Park View Road, which the</p>

Conformity with London Plan Policy D9 Part C	
London Plan Policy D9 Part C	Assessment of Conformity
	<p>current site does not benefit from. Drag distances to and from the refuse stores are within the acceptable range.</p> <p><u>Entrances & Ground Floor Uses</u></p> <p>As set out in the accompanying Design & Access Statement, four residential entrances will be provided along Park View Road, the primary frontage for the site and proposed building, and care has therefore been taken to avoid concerns with isolation and associated safety/feeling of safety concerns.</p> <p>Two separate entrances to the WUFC stadium will also be provided along Park View Road for spectators.</p> <p>Finally, commercial and football club entrances have also been provided along Park View Road.</p> <p>The entrances have been distributed along the Park View Road frontage in order to minimise any potential risks with overcrowding. Additionally, the Park View Road pavement will also be widened by 2m to provide greater space, and consequently further minimise potential overcrowding issues.</p> <p><u>Transport Network Capacity</u></p> <p>As set out in the accompanying Transport Assessment, the proposals will have an acceptable impact on existing public transport routes and the local public highway, and will not result in capacity issues.</p> <p>Any potential capacity issues surrounding facilities and services can be addressed through the significant Community Infrastructure Levy liability attached to the proposed development.</p> <p><u>Aviation, Navigation & Telecommunications</u></p>

Conformity with London Plan Policy D9 Part C	
London Plan Policy D9 Part C	Assessment of Conformity
	The proposed development would not interfere with aviation, navigation or telecommunication, nor create significant adverse impacts on any neighbouring solar panels
<p>London Plan Policy D9 Part C: environmental impacts</p> <p>a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.</p> <p>b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.</p> <p>c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</p>	<p><u>Wind, Daylight & Sunlight Penetration</u></p> <p>As set out in the accompanying Daylight & Sunlight Assessment, prepared by T16 Design, the impacts of the proposed development on neighbouring properties, as well as the Bexleyheath Cricket Pitch, will be acceptable in the context of an urban site, and in line with the aims of the BRE guidance. Please see the 'Neighbouring Amenity' section below for further information.</p> <p>No wind or temperature impacts are expected given the scale of the proposed development.</p> <p><u>Pollutants</u></p> <p>No significant air movements are anticipated from the proposed building given its scale.</p> <p>As set out in the accompanying 'Air Quality' section below, an Air Quality Assessment has been submitted as part of this application, which confirms the proposed development is acceptable in air quality terms.</p> <p><u>Noise</u></p> <p>No significant air movements are anticipated from the proposed building given its scale.</p> <p>As set out in the accompanying 'Neighbouring Amenity' section below, a Noise Assessment has been submitted as part of this application, which confirms the proposed development is acceptable in noise terms, and will not result in any detrimental noise impacts to neighbours.</p>
London Plan Policy D9 Part C: cumulative impacts	The cumulative impacts of development have been considered as part of the proposed

Conformity with London Plan Policy D9 Part C	
London Plan Policy D9 Part C	Assessment of Conformity
the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.	development. No proposed, consented or planned tall buildings are in close vicinity of the site.

6.78 In addition, the wording of Policy DP12 maximum height of buildings ‘shall not normally’ be more than 15m in this location. The policy wording, therefore, clearly enables exceptions to be made and we would highlight that a football stadium is not a typical building. An exception is therefore warranted and appropriate in this instance, despite broad compliance with the policy tests as demonstrated below:

Conformity with LBB Local Plan Policy DP12	
LBB Local Plan Policy DP12	Assessment of Conformity
There is sufficient access to public transport.	As set out in the accompanying Transport Assessment, the proposals will have an acceptable impact on existing public transport routes and the local public highway, and will not result in capacity issues.
There is access to local services and facilities, depending on the number and type of residents expected.	No concerns regarding the capacity or access to local services/facilities is anticipated; however, any potential capacity issues surrounding facilities and services can be addressed through the significant Community Infrastructure Levy liability attached to the proposed development or planning obligations.
The proposal will not have an unacceptable adverse impact on local character, including heritage assets.	The submitted Heritage Statement determines that impacts to the heritage assets within the surrounding area are negligible, with ‘No Harm’ perceived to any of the designated heritage assets within the surrounding area, and consequently no mitigation or recommendations are required. On this basis, the proposed development is therefore considered to be acceptable in heritage terms.
The design considers topography.	Topography of the local area has been considered, and how the proposed development sits in the local context is addressed as part of the

Conformity with LBB Local Plan Policy DP12	
LBB Local Plan Policy DP12	Assessment of Conformity
	Townscape and Visual Impact Assessment, as well as the Heritage Statement.
The proposal will not create unacceptable adverse environmental impacts, including flood risk, creation of a wind tunnel, loss or lack of daylight and sunlight.	<p>The proposed development is considered to be acceptable with regard to environmental impacts, including flood risk, daylight & sunlight, lighting, noise, contamination and air quality.</p> <p>Technical reports on these matters have been submitted as part of this application; please see the relevant sections below for further detail.</p>
The design is of high architectural quality.	<p>The highest level of architectural quality and materials are proposed for the scheme, with the proposals seeking to create a landmark scheme, but which includes elements reflecting the character of the wider area. Further detail is provided in the 'Appearance & Materiality' subsection below.</p> <p>The exact detail and quality of materials can be secured via condition, as is often the case.</p>
The proposal will integrate into its surroundings at all levels, particularly at street level and into the skyline.	<p>The submitted Townscape and Visual Impact Assessment determines that the proposed development would have largely adverse effects limited to the townscape character of the site and the views afforded to nearby recreational, residential and highways receptors.</p> <p>However, the largest effect is felt within the site and adjacent to the site due to the permanence and extent of change, combined with the footprint of development.</p> <p>Lesser effects (moderate adverse to negligible adverse) would be felt indirectly in the townscape during the long-term and permanent duration of the proposed development.</p> <p>The presence of tree cover around the site and in the wider landscape, as well as the built form, limits important effects on townscape character</p>

Conformity with LBB Local Plan Policy DP12	
LBB Local Plan Policy DP12	Assessment of Conformity
	<p>and visual amenity to the immediate surroundings of the site. Views from further afield are typically obscured by intervening built form and/or vegetation.</p> <p>It is important to note the nature of this scheme as a stadium redevelopment, however, and therefore the intrinsic scale of development required.</p>

6.79 On this basis, the proposals are considered to broadly accord with the requirements of London Plan Policy D9 and LBB Policy DP12, particularly given the nature of the scheme as a stadium redevelopment; the height of the proposed buildings is therefore considered to be acceptable, despite the site not being located in a Sustainable Development Location nor an identified tall building location. As highlighted above, the wording of Policy DP12 does allow exceptions.

6.80 It is also important to note the nature of the development, and the financial constraints associated with the proposals. As set out in the 'Affordable Housing & Financial Viability' section below, as well as the accompanying Financial Viability Assessment Report, due to the financial pressures underpinning the re-provision of and substantial enhancements to WUFC's facilities and stadium without cost to the football club, the scheme proposes the minimum quantum of development required in order to make the scheme financially viable.

Appearance & Materiality

6.81 The proposals have broadly followed a London mansion house typology. The building, as with London mansion house typologies, deploys elaborate highly ornate detailing to distract from the overall scale of the building. The architectural composition proposed has a tripartite classic par-tee with a clear top, middle and base with particular attention paid to providing a strong and characterful roof form (a double storey curved mansard roof with a series of two storey metal clad dormers).

6.82 Extensive work has been undertaken throughout the design and pre-application process to break down the massing through elevational design. The Park View Road façade has been broken this facade into four smaller blocks to reduce the lateral scale of the building, and the vertical mass is composed to reduce the visual bulk by articulating the base, middle, and roof sections as independent compositional elements.

- 6.83 With regard to specific materials, the proposed development has sought to relate the scheme to its surroundings, as well as ground the proposals within the site history, whilst ensuring the buildings is of a high quality. The building is primarily composed of red brick, with complementary light bronze panelling for the double height mansard roof and dormers, window detailing and elevational recesses. Discreet dark brown brick detailing is also included on the mansard roofs to complement the light bronze panelling.
- 6.84 A number of design measure have been taken to ground the proposals in the site, and create a visual linkage with WUFC. Club roundels are provided above the club shop and the players/officials entrance, on Park View Road and Roseacre Road respectively. Additionally, red ceramic brick and aluminium panelling is proposed above ground-floor level and at the first floor along most of the Park View Road frontage, matching the club colours and creating a wayfinder for supporters. Above the sixth floor, at the termination of the redbrick façade and just before the mansard roof, red ceramic/metal lettering on a white glazed brick/tile background is proposed to spell out 'Welling United FC'. 'WUFC' lettering is also proposed to adorn the metal railings above the spectator entrances.
- 6.85 On this basis, the proposed appearance and materials are considered to be of a high-quality, appropriate for the type and scale of development, and will also reflect the site's historic use as Welling FC's football stadium, whilst relating well to surrounding character.
- 6.86 Please see the accompanying Design and Access Statement for more information on appearance and materiality.

Crime & Safety

- 6.87 As set out in the accompanying Design and Access Statement, a meeting with the local Metropolitan Police Designing Out Crime Officer (Mark Headley) took place on 14th September 2023. The meeting served as a workshop to discuss the proposals and any potential amendments to the scheme to improve safety for future occupants.
- 6.88 Recommendations from the DOCO were incorporated into the design of the scheme, and the development will ensure that the highest standards of safety and crime prevention are met, in line with the aspirations of the Secured by Design principles and guidance.
- 6.89 It is considered that any detail with respect to Secured by Design can be secured via condition; on this basis, the proposals are considered to be acceptable in terms of crime and safety.

FA Compliance

- 6.90 In order to meet FA requirements for Category A and enable progression of WUFC to the National League, the ground must meet the relevant FA regulations (for National Ground Grading). This represents a key design tenet for the development, as the proposed development will strengthen the football club and enable its sustainability and growth, with the anticipation of moving up to the National League.
- 6.91 As set out in the accompanying Design and Access Statement, an assessment of compliance against FA Ground Grading requirements has been undertaken. As shown in the Design and Access Statement matrix, the proposals are in compliance with all requirements, with the exception of floodlighting achieving an average of 250lux across the ground. This is not possible due to the confines of the ground, but the proposals represent an improvement over the current situation in any event (see Lighting Assessment consideration further below in this section).
- 6.92 Nevertheless, it is considered that suitable lighting is provided, and that further discussions with the FA will be held to confirm this.

Conclusion

- 6.93 The design and scale of the proposed development has been shaped by the re-provision of the existing Welling FC stadium use, the limited footprint of the site, and financial considerations. Nevertheless, the proposed development is considered to be optimised in the context of a design-led approach, having accounted for the relevant policy objectives, the surrounding existing and emerging built form, heritage assets, local safety and reduction of crime, and other technical considerations.
- 6.94 On this basis, the proposed development is therefore considered to be of a high-quality design, and is acceptable in design terms.

F. HERITAGE, MOL & ARCHAEOLOGY

- 6.95 Paragraph 202 of the NPPF states that, where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.96 London Plan Policy HC1 states that proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and

appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- 6.97 London Plan Policy HC1 further outlines that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 6.98 LBB Local Plan Policy SP8 seeks to protect Metropolitan Open Land from inappropriate development, and encourages beneficial use of the Metropolitan Green Belt, such as opportunities for public access, outdoor sports and recreation.
- 6.99 LBB Local Plan Policy SP6 seeks to apply NPPF and London Plan requirements for development proposals affecting heritage assets to conserve and enhance the significance of heritage assets, their settings, and the wider historic environment, and the requirements to protect assets from development that is likely to adversely impact on the significance, integrity, character or appearance of those assets or their settings.
- 6.100 Policy DP14 of the LBB Local Plan further states that proposals with the potential to directly or indirectly impact on a heritage asset or its setting should meet NPPF requirements to describe the significance of the asset and demonstrate how the proposal conserves or enhances the significance of the asset.
- 6.101 Policy DP14 further states that proposals should be assessing the archaeological potential of sites and then retaining, in situ, archaeological evidence within sites, wherever possible. Where archaeological evidence cannot be retained, the appropriate levels of archaeological investigation and recording should be undertaken prior to the redevelopment of the site.

Heritage & MOL Impact

- 6.102 In support of the proposed development, a Heritage Statement, prepared by Brindle & Green, has been submitted. The Heritage Statement identifies any designated heritage assets (including listed buildings) within the surrounding area, establishes the impact of the development on these heritage assets or their setting, and proposes required mitigation (if any) for these heritage assets, in line with relevant Historic England guidance.

6.103 The Statement confirms that there is one Registered Park and Garden (Danson Park), 5 listed buildings and structures (Stables to Danson Park; Danson Park Mansion; Former Fosters Primary School; Crook Log Public House; 71 Danson Road) and one Conservation Area (Red House Lane Conservation Area) within 1km of the site.

6.104 Following this, the Statement undertakes an assessment of impact on these designated heritage assets. The Statement draws the following conclusions:

- Danson Park & associated listed buildings: Mature woodland is located along the northern boundary of the park, which provides visual screening from the perspective of the park. The existing football ground is not visible from the park, in addition to the other built-up areas along Park View Road. The proposed residential block is to be situated along the northern side of the football ground. With the proposed residential development being eight stories in height, a layout of the Zones of Theoretical Visibility (ZTV) has been developed to show which perspectives the completed development may be visible from. This layout shows that the residential block may be visible from certain perspectives within the park, the most prominent being at the north-eastern corner. This should however be taken into consideration in the context of existing built-up development already present along Park View Road. The development is not expected to be visible from the perspective of the mansion house, or of the stable, with other viewpoints being only partial. As such, it is not expected that the proposed development would result in any detrimental harm to the appeal of the park and the listed buildings within.
- Red House Lane Conservation Area: ZTV analysis suggests that it is unlikely that the completed development will be visible from the perspective of the conservation area. It is considered that the value of this conservation area derives from a restricted setting within the boundaries of the conservation area, as any wider setting was lost to development in the early part of the 20th century. As such, 'no harm' is perceived to this conservation area by the development.
- Crook Log Public House: The analysis of the likely visibility of the development after completion shows that the residential block may be within visual range from the perspective of the Crook Log Public House listed building. However, this potential visibility should be taken into context of the built-up area in which this listed building is already located in. The Bexley character assessment notes now the residential development adjacent to the Crook Log Public House has had much more of a detrimental impact to the immediate setting of this building. Although a ZTV analysis reveals that the development will likely be visible to the west from the perspective of within the main road, within the grounds of the pub this will likely be more limited. As such, given the wider setting has a limited contribution to the value of this building, it is not expected that the proposed development will result in any

perceivable impact on the setting and therefore the historic value of the building, with 'No Harm' resulting from the development.

- Former Fosters Primary School: The analysis of the likely visibility of the development after completion shows that the residential block may be within visual range from the perspective of the Former Fosters Primary School listed building. However, this potential visibility should be taken into context of the built-up area in which this listed building is already located in. As such, given the wider setting has a limited contribution to the value of this building, it is not expected that the proposed development will result in any perceivable impact on the setting and therefore the historic value of the building, with 'No Harm' resulting from the development.

6.105 The Heritage Statement therefore concludes that impacts to the heritage assets within the surrounding area are negligible, with 'No Harm' perceived to any of the designated heritage assets within the surrounding area, and consequently no mitigation or recommendations are required. On this basis, the proposed development is therefore considered to be acceptable in heritage terms.

Archaeology

6.106 An Archaeological Desk Based Assessment, prepared by Brindle & Green, has been submitted in support of this planning application. The Assessment draws together the available archaeological, historical and topographic information to assess the archaeological impact of the proposed development.

6.107 From review of available information, the Assessment establishes that there is a potential of moderate value Roman and low value medieval and post-medieval remains, with the proposed works having a moderate impact on all of these features. Therefore, it is concluded that the significance of impact to archaeological remains on site ranges from slight to moderate.

6.108 In light of the site's potential, the Assessment recommends the most appropriate strategy entails a precautionary watching brief of the initial ground-breaking works on site, which is considered sufficient to mitigate for the likelihood of any non-designated archaeological remains on-site. These works will be set out within a Written Statement of Investigation and agreed with an archaeological officer.

6.109 It is considered appropriate to secure the need for a Written Statement of Investigation via condition attached to the planning permission; on this basis, it is therefore considered that the proposed development has suitably mitigated for potential archaeological remains, and is therefore acceptable in terms of archaeology.

G. AFFORDABLE HOUSING & FINANCIAL VIABILITY

- 6.110 London Plan Policy H4 and page 5 of the Mayor's Affordable Housing and Viability SPG set a strategic target for 50% of all new homes delivered across London to be affordable. Policy H5 further outlines the approach to affordable housing, and sets a thresholds for major development to provide 35% affordable housing and meet other criteria (the fast-track approach) or be viability tested.
- 6.111 Policy H6 of the London Plan further outlines that the following split of affordable home tenures should be applied to residential development:
- a minimum of 30% low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;
 - a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership; and
 - the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- 6.112 Policy SP2 of the LBB Local Plan sets a target of 50% affordable housing provision for development, with an overall tenure mix of 70% low cost rented and 30% intermediate housing products and with a mix of housing types and sizes in line with local requirements.
- 6.113 LBB Local Plan Policy DP1 states that, for residential development proposals with a capacity of 10 or more (gross) dwellings, the Council will follow a threshold approach to affordable housing in line with London plan policies H4 and H5. The Policy further notes that proposals that do not meet the affordable housing threshold will be refused unless justified by a full, normally unredacted viability assessment that is submitted at the same time that a planning application is submitted.
- 6.114 Due to the financial pressures underpinning the reprovision of and substantial enhancements to WUFC's facilities and stadium without cost to the football club, the scheme has achieved the minimum quantum of development required in order to make the scheme financially viable; as a result, no affordable housing is offered as part of the residential element.
- 6.115 A Financial Viability Assessment Report, prepared by ULL Property, has been submitted to support the planning application. The Report assesses the financial viability of providing affordable housing and Section 106 financial contributions as part of the development proposal, the deliverability and long-term sustainability of the stadium and related community benefits, and the extent to which the project can contribute to policy targets.

- 6.116 In the first instance, it is important to note the development's nature as enabling development, which differs from a traditional scheme. As previously mentioned, the club is currently operating at a financial loss, and the purpose of the proposed development is to secure the future of the Club and maintain and enhance the community benefits the Club provides. Whilst there is no specific planning guidance on enabling development in respect of 'non-historic assets', it is considered certain principles contained within '*Historic Environment Good Practice Advice in Planning Note 4*' from Historic England entitled '*Enabling Development and Heritage Assets*' (2020) ('HE Guidance') provide a relevant framework for assessing the viability of the development proposals for the Club.
- 6.117 The Report therefore sets out to demonstrate the financial and operational constraints of the existing situation ('doing nothing' scenario) and compares this with a scenario in which the proposed development was to come forward ('development proceeds' scenario). From this assessment, the Report outlines that that 'doing nothing' would move the Club into a significant negative cashflow position by the end of 2024. However, if the enabling residential development proceeds and funds the new stadium and related improvements, a positive net cashflow is produced in the first year of operation. As such, the Report concludes that the re-development of the Site to create a new stadium and related facilities, will help to secure the future of the Club.
- 6.118 Following this, an appraisal of the financial viability of the scheme is undertaken, using the Argus developer appraisal tool. The appraisal determines that the development achieves a Residual Land Value ('RLV') of £62,400 (rounded), effectively a break-even position. When the RLV is compared to a cost of £5,374,000 (rounded) for the new stadium and related facilities, the project produces an overall deficit of (-£5,312,000) (rounded). As such, the project is unable to sustain any contributions to affordable housing or additional planning financial contributions (over and above the £1.3M indicative CIL contribution, and an indicative S106 sum of £200,000).
- 6.119 On this basis, the amount of enabling development is therefore considered to represent the minimum quantum in order to make the proposed development viable/deliverable, and no affordable housing can be provided as part of the proposals. The proposals also enable the club to be financially stable and operational in the long-term, which would not be possible without redevelopment of the existing facilities.
- 6.120 A viability review will be undertaken by the Council's viability assessor at the application determination stage, which will confirm the exact financial position of the proposed development.

H. HOUSING MIX

6.121 Policy H10 of the London Plan states that schemes should generally consist of a range of home sizes. To determine the appropriate mix of sizes in relation to the number of bedrooms for a scheme, the policy further states that applicants and decision-makers should have regard to:

- robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment;
- the requirement to deliver mixed and inclusive neighbourhoods;
- the need to deliver a range of home types at different price points across London
- the mix of uses in the scheme;
- the range of tenures in the scheme;
- the nature and location of the site, with a higher proportion of one and two bed homes generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
- the aim to optimise housing potential on sites;
- the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock; and
- the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

6.122 Policy H12 of the London Plan states that residential development should offer genuine housing choice with regard to the range of housing size and type

6.123 Policy SP2 of the LBB Local Plan seeks to deliver a balance of family and other types and sizes of housing within affordable and market housing schemes, as identified in the Bexley SHMA.

6.124 Table 3 of the LBB Local Plan sets out the following target housing mix, based on the Bexley SHMA:

Unit Size	Market	Low-Cost Rent	Intermediate	All Tenures
1-bed	5.7%	18.6%	12.8%	9.6%
2-bed	32%	59.3%	42.7%	39.8%
3-bed	41.1%	17.3%	34%	34.5%
4-bed	21.2%	4.9%	10.5%	16.1%

6.125 LBB Local Plan Policy DP1 states that development proposals, as a starting point, should seek to deliver a mix of dwelling sizes, including family housing, in line with Table 3, in order to meet overall need across the borough over the plan period.

6.126 The mix of units proposed is as follows:

- 1-bed units: 24 units (23.1%)
- 2-bed units: 61 units (58.6%)
- 3-bed units: 19 units (18.3%)

6.127 The mix of units is mix on the affordable element has been subject to considerable pre-application discussions and is considered appropriate to meet local demand. Both LBB and the GLA have not raised concern with the proposed mix, and a sizeable proportion of the proposed units will be 3-bed family homes (18.3%).

6.128 Whilst there is a larger proportion of one-bedroom units than identified in the SHMA, the site is considered to be appropriate for smaller homes; the site is in relatively close proximity to Welling town centre and benefits from a reasonable PTAL of 3 due to the proximity and frequency of bus services, as well as ease of access to Welling train station. The site is also in walking distance of various services and amenities.

6.129 It is considered that the proposals will deliver an acceptable range of housing types and size and will ultimately help to create a mixed and balanced community, in accordance with the aims of strategic and local planning policy. The proposed mix of homes is considered to be appropriate given the site's context, and has been arrived at through extensive discussions with LBB officers.

I. HOUSING QUALITY

6.130 London Plan Policy D6 states that housing development should be of high-quality design and provide adequately-sized rooms ... with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Table 3.1 of the London Plan sets the minimum space standards for new dwellings, which are the same as the Nationally Described Space Standards.

6.131 Policy D6 further notes that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach

than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

6.132 Policy D6 also outlines that the design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

6.133 Policy D7 of the London Plan requires residential development to ensure that:

- At least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and
- All other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

6.134 Standard 26 of the London Housing SPG sets a minimum requirement of 5sqm of private outdoor space for 1-2 person dwellings, and an extra 1sqm for each additional occupant, where there are no higher local standards.

6.135 LBB Local Plan Policy DP1 states that housing development must achieve relevant London Plan space, accessibility, environmental, and housing amenity standards, having regard to published guidance.

6.136 LBB Local Plan Policy DP11 states that, irrespective of location, all development proposals for new buildings, extensions and alterations, conversions, changes of use and public and private spaces will be expected to:

- ensure that appropriate levels of privacy, outlook, natural daylight and other forms of amenity are provided;
- ensure that all proposed development and uses do not unacceptably affect residents of the proposed development by means of noise, odour, vibration and light spill or other disturbances;
- provide sufficient useable on-site external amenity space (communal, semi-private and private) and appropriate play spaces for children, relative to the proposed scale of development; and
- meet appropriate internal accommodation standards.

Internal Floorspace, Layout & Orientation

- 6.137 All proposed homes will be fully compliant with NDSS/London Plan internal floorspace requirements and built-in storage requirements, thereby delivering appropriately-sized homes for future occupiers.
- 6.138 Additionally, the proposed development has been carefully designed to maximise the proportion of dual-aspect homes, and minimise all single-aspect homes. 79% of the proposed homes will be dual aspect, and no single-aspect, north-facing homes are proposed. Additionally, whilst not being truly dual-aspect, a number of units are considered to be dual outlook, as they include windows on different facades.
- 6.139 Whilst there is an element of single-aspect units (14% when not counting dual outlook dwellings) within the scheme, this is a result of the constraints of the site and the need to deliver an efficient scheme which optimises the delivery of housing. It should be noted that all single-aspect, north-facing homes are either one or two-bed homes, and all family homes will be dual aspect; the proposals have therefore been carefully designed to ensure that all family homes have maximised aspects, in line with London Plan aspirations.
- 6.140 Further detail on the quality of these homes is provided below, in the relevant subsections. However, in summary, the relevant technical assessments, such as daylight/sunlight, overshadowing, overheating, noise/vibration and air quality, demonstrate that these homes will experience a high-quality living environment.
- 6.141 On this basis, the proportion of single-aspect homes, including north-facing homes, is considered to be acceptable.

Dwellings per Core

- 6.142 As required by the Housing Design Standards London Plan Guidance (June 2023), no cores exceed eight units per floor.

Wheelchair Accessibility

- 6.143 In line with policy requirements, 10% of homes (10 units) has been designed to be M4(3) wheelchair adaptable, with the remainder of units being M4(2) compliant. A M4(3) compliance checklist has been provided in the accompanying Design and Access Statement, which confirms that the M4(3) wheelchair adaptable flats are fully compliant with requirements.

Amenity Space

6.144 The proposal will deliver private amenity space for all proposed homes, in the form of balconies or terraces which complies with the requirements of the London Plan and London Housing SPG.

4.32 The proposal includes additional amenity space on the west wing rooftop (189sqm), east wing rooftop (161.5sqm) and first-floor podium space (149sqm). Of these amenity spaces, the current breakdown of uses is as follows:

- West Wing Rooftop:
 - Communal Amenity: 110sqm
 - 0-4 Play Space: 47sqm
 - 5-11 Play Space: 32sqm
 - TOTAL: 189sqm

- East Wing Rooftop:
 - Communal Amenity: 112.5sqm
 - 0-4 Play Space: 30sqm
 - 5-11 Play Space: 19sqm
 - TOTAL: 161.5sqm

- First-Floor Space:
 - 0-4 Play Space: 104sqm
 - 5-11 Play Space: 45sqm
 - TOTAL: 149sqm

6.145 In addition to the London-Plan compliant level of private amenity space, rooftop communal amenity space will also be provided on the western and eastern wings of building, totalling 110sqm and 112.5sqm respectively (excluding play spaces). These will provide future residents with opportunities to relax, socialise and undertake activities, providing a high-quality living environment.

6.146 Given the proposals will deliver London-Plan compliant levels of private amenity space along with significant communal amenity in this constrained, urban location, the proposed level of amenity space is considered to be ample and provide a high-quality environment for future occupiers. It should also be noted that the delivery of communal amenity space needs to be balanced with the delivery of both play space.

Play Space

- 6.147 Overall, the proposals will deliver 277sqm of new dedicated play and playable landscape. 100% of the doorstep play requirements for young children aged 0-4 have been satisfied (181sqm), as well as 80.7% of local play (96sqm against a requirement of 119sqm) for 5-11 year olds.
- 6.148 All 0-4 and 5-11 play space requirements have been delivered on the West and East Wings for the blocks/units which have access to these spaces. The first-floor podium garden has been maximised for play space, and will deliver a compliant level of 0-4 doorstep play (104sqm), but will provide 65.2% of 5-11 year old play space for its occupiers (45sqm against a requirement of 69sqm).
- 6.149 In accordance with GLA guidance, an assessment of play opportunities has been undertaken on the basis of a 100m walk for the 0-4 age group, 400m walk for 5-11 age group, and 800m walk for 12+ age group. The assessment identifies that Danson Park is located 600m walking distance from the site, and is therefore within a suitable distance for the 12+ age group (800m requirement). On this basis, the deficiency in 12+ play provision can be satisfied off-site at the nearby Danson Park, which offers dedicated play areas, green space and sports courts for older age groups to enjoy.
- 6.150 Whilst there is a shortfall in 5-11 year olds which cannot be addressed off-site in line with GLA guidance, this is considered to be a small shortfall and Danson Park is located approximately 600m walking distance from the site, only slightly above the 400m threshold, with extensive opportunities for play.
- 6.151 It should also be noted that there are also additional open spaces and play spaces, such as Stevens Park, Penhill Park and Falconwood Park, which offer further opportunities for play beyond the walking distances in GLA guidance.
- 6.152 In conclusion, the minor shortfall in 5-11 year old play space is considered to be acceptable given the circumstances, as well as the fact the proposals have sought to maximise play space within a constrained site. Additionally, the shortfall in play space for the 12+ age group can be suitably addressed through Danson Park, in line with GLA guidance. As such, the proposals will deliver extensive private and communal amenity space and play space, and will offer residents a high-quality environment.

Daylight, Sunlight & Overshadowing

- 6.153 A Daylight and Sunlight Assessment, prepared by T16 Design, has been submitted in support of this application. The report assesses the proposals in respect of daylight, sunlight and overshadowing matters, having regard to industry standard guidance, most importantly BRE guidance.
- 6.154 The Assessment includes an assessment of internal daylight within the proposed development, using the Target Daylight Factor method, and assesses units on the lowest floor, on the basis that higher ones will be at least as well-lit, in line with BRE guidance.
- 6.155 The Assessment confirms that, from the results, all assessed habitable rooms meet and exceed the minimum levels of internal daylight.
- 6.156 On this basis, the proposed development is therefore considered to be acceptable in terms of its internal daylight and sunlight impacts.

Overheating & Ventilation

- 6.157 An Overheating Analysis Report, prepared by Mendick Waring Ltd, has been submitted in support of this application. The Report considers all residential areas of the proposed development and seeks to investigate the overheating potential and propose an alternative solution to improve the thermal comfort of areas identified with a risk of overheating, if there is any, for the habitable spaces, kitchen/dining/living rooms and bedrooms.
- 6.158 The Report outlines that the following strategy will be proposed to limit the risk of overheating, given passive ventilation via openable windows is not possible (as set out in the accompanying Noise Assessment):
- Low Solar Energy Transmittance glazing with a G-Value of 45% to all windows.
 - Solar Energy Transmittance (G-Value) 40% to initially failing rooms.
 - Mechanical Ventilation with Heat Recovery (MVHR) in all flats (2ach).
 - MVHR with cooling to dwellings with initially failing rooms.
 - Closed windows and balcony doors, as per Noise Assessment.
- 6.159 Based on this strategy, the Report undertakes an assessment of overheating risk for kitchen/dining/living rooms and bedrooms on a sample of 19 flats and duplexes, and confirms that 100% of rooms (56 out of 56) pass the CIBSE TM59 overheating Criterion A and 100% of bedrooms (37 out of 37) pass Criterion B for the current climate, considering a G-value of 45%.

- 6.160 Based on prorated data, the Report confirms that 17 dwellings should be equipped with MVHR system with flow rates of 2ach to each habitable room, 28 dwellings with a decreased g-value of 0.4, and 59 dwellings with a MVHR system with cooling unit.
- 6.161 The Report confirms that additional testing has been undertaken in accordance with current GLA guidance using the 2020 versions of the extreme year weather files: DSY2-2003 a year with a very intense single warm spell; and DSY3-1976 a year with a prolonged period of sustained warmth.
- 6.162 The analysis confirms that all rooms pass DSY2-2003. With regard to DSY3-1976, it is noted that the targets for a year with a prolonged period of sustained warmth are very challenging to meet. This is acknowledged by GLA guidance, which states compliance is not mandatory, but the developer must reduce the risk of overheating as far as practical and ensure all passive measures have been explored. The results against an analysis of DSY3-1976 confirms that 100% of assessed rooms pass Criterion A. 94.6% of the assessed Bedrooms pass Criterion B for night-time hours over 26°C.
- 6.163 The Report confirms that, in order to mitigate the risk of overheating in DSY2 and DSY3 scenarios, occupants can use internal blinds and small power electric fans at night, during extreme weather events.
- 6.164 On this basis, the proposed development is therefore considered to be acceptable in terms of overheating and ventilation, and will ensure future occupiers experience acceptable temperatures in their homes.

Noise & Impacts

- 6.165 A Noise Assessment, prepared by Hawkins Environmental, has been submitted in support of this planning application. The Assessment outlines that a baseline noise survey has been carried out to understand the existing noise context, as well as a detailed noise measurement study during a Welling FC football match, so as to understand the noise circumstances during matchdays.
- 6.166 Based on survey results, the Assessment confirms that, in order to achieve suitable internal noise levels, windows facing Park View Road will include glazing with a minimum Sound Reduction Index of 37 dB for living rooms and 39 dB for bedrooms.

- 6.167 For windows facing the football pitch, glazing with a Sound Reduction Index of 39 dB will be included both in bedrooms and living rooms. Where a wintergarden exists, it is anticipated that a combination of the wintergarden with a standard double-glazed system with a minimum Sound Reduction Index of 33 dB will be appropriate and ensure that in a worst-case scenario, the internal ambient noise levels within the bedrooms and living rooms meet relevant criteria.
- 6.168 The Assessment also assesses party wall requirements between the proposed units and proposed ground floor commercial/club uses, and makes recommendations which will need to be accounted in the detailed design going forward, including limitations to the club's PA system, and management/design recommendations for the club bar.
- 6.169 With the above mitigation in place, this will result in internal daytime and internal night-time noise in line with standards.
- 6.170 In addition to the above matters, it is acknowledged that the site is in a unique location, with the southern and eastern elevations facing onto a football pitch and cricket pitch, respectively. As a result, it is proposed to use hammer glass to account for potential ball strikes. The exact detail can be secured via condition, and will account for acoustic and thermal requirements. The accompanying Design and Access Statement provides an overview of relevant windows.
- 6.171 Given the proposals have accounted for the noise context at the site and have suitably mitigated these, and the proposals include measures to protect from ball strikes, the development is considered to be acceptable in terms of noise and impacts for future occupiers of the scheme.

Privacy & Overlooking

- 6.172 With regard to privacy, the proposed development experiences sufficient separation distances with properties opposite Park View Road, to the north. Whilst there is a close relationship between proposed units to the south of the west wing and 56 Roseacre Road, overlooking and loss of privacy between the properties has been managed through the use of design measures such as obscure glazing, screens to terraces, and the siting of balconies away from the proposed building's south elevation.
- 6.173 On this basis, the proposals are therefore considered to be acceptable in terms of privacy.

Floodlighting

- 6.174 A Lighting Assessment, prepared by Kingfisher Lighting, has been submitted in support of this planning application. As part of the Assessment, a detailed site visit to record existing light levels was undertaken, and compared with the proposed lighting strategy.
- 6.175 Whilst the proposals will not achieve the relevant lux criteria, this is as a result of the site's characteristics and, as outlined in the Assessment, the replacement LED installation will result in a general and pronounced reduction in lux levels and light spillover over the existing situation.
- 6.176 Whilst levels to the proposed units will be above relevant thresholds, cowls have been added to the fittings to seek to reduce impacts; additionally, further measures such as blinds can be introduced to the proposed units to help future residents appropriately manage light spillover.
- 6.177 Further detail on lighting proposals, as well as the hours of use, can be suitably secured via condition and/or legal agreement. As such, it is therefore considered that the proposed lighting will have a manageable impact on future residents, and does not constitute a reason for refusal.

J. NEIGHBOURING AMENITY

- 6.178 London Plan Policy D3 states that developments should deliver appropriate outlook, privacy and amenity and help prevent or mitigate the impacts of noise and poor air quality. London Plan Policy D6 D) also states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context. London Plan Policies D8 and D9 require developments to take account of wind in the design of development proposals.
- 6.179 LBB Local Plan Policy DP11 states that, irrespective of location, all development proposals for new buildings, extensions and alterations, conversions, changes of use and public and private spaces will be expected to:
- ensure existing properties' amenity is appropriately protected; and
 - ensure that all proposed development and uses do not unacceptably affect existing neighbouring residents, businesses and community facilities by means of noise, odour, vibration and light spill or other disturbances.

Daylight, Sunlight & Overshadowing

- 6.180 A Daylight and Sunlight Assessment, prepared by T16 Design, has been submitted in support of this application. The report assesses the proposals in respect of daylight, sunlight and

overshadowing matters, having regard to industry standard guidance, most importantly BRE guidance.

- 6.181 With regard to daylight, the Assessment includes a Vertical Sky Component (VSC) calculation for all relevant neighbouring properties, including 45 & 56 Roseacre Avenue, 1-8 Ellard Court, 1 -36 Denham Close, 122 Park View Road and 114-120 Park View Road; the total number of windows assessed is 57.
- 6.182 The Assessment confirms that, of the 57 windows assessed, 42 (74%) retain 80% of their current values or a VSC in excess of 27%, in full compliance with the BRE guidance. The windows which fall short of this target are on 1-8 Ellard Court and 1-36 Denham Close. No floor plans for these neighbours could be obtained to verify the layouts, and hence undertake the more detailed No Sky Line test, but from external appearances, it is clear that these are average sized rooms, served by very large windows.
- 6.183 The Assessment further clarifies that windows on Ellard Court have all been assessed although it is likely that not all serve habitable rooms or serve bedrooms where light is considered of lesser importance.
- 6.184 Additionally, those on Denham Court are large windows and all retain a residual VSC of greater than 18%, in excess of what is considered an adequate level for an urban location. As the windows are large, it is likely that the rooms which they serve, despite falling short of the VSC test, will continue to be well lit.
- 6.185 On this basis, in the context of an urban site, the Assessment considers these results to be acceptable and in line with the aims of the BRE guidance. It should also be noted that the GLA representation hearing D&P/3067/03 states the following: "In an inner-city urban environment, VSC values in excess of 20% should be considered as reasonably good, and that VSC in the mid-teens should be acceptable.' In this respect, all assessed windows are compliant, as they exceed VSC in the 'mid-teens'.
- 6.186 With regard to sunlight, BRE guidance states that only windows which face within 90° of due south need be assessed for sunlight provision. In this instance, 53 windows fall into this category.
- 6.187 The Assessment confirms that Annual Probable Sunlight Hours has been calculated for each of these windows for both the existing and proposed condition, both over the whole year and through the "winter months" (September 21st until March 21st).

- 6.188 The results below show that all of the assessed windows retain 25% of available sunlight hours annually and 5% over the winter months, in line with BRE guidance. On this basis, the scheme is therefore compliant with BRE guidance in relation to sunlight impacts.
- 6.189 Finally, with regard to overshadowing, residential gardens are generally assessed using the sunlight hours test, but only on March 21st. The guidance describes a well-lit space as being one which receives at least 2 hours of direct sunlight on this date over 50% of its area. BRE guidance also uses the "80%" rule for this test, whereby the effects are considered acceptable if the remaining sunlight is in excess of 80% of the existing level. This clause applies if the space is reduced to less than 50% of the area well sunlit.
- 6.190 The Assessment undertakes a calculation of overshadowing to neighbouring residential gardens and confirms that the neighbouring gardens retain over 80% of their existing values (and in-fact all retaining over 99%).
- 6.191 Additionally, with regard to Bexleyheath Cricket Club, the proposed development will not impact sunlight hours, with 100% of the wicket (area G6) and 99.95% of the entire pitch (area G5) receiving 2 hours of sunlight on March 21st. From the overshadowing diagrams provided in the Assessment, it is also clear that impacts will be limited even during the later hours. The cricket pitch also includes floodlighting, which the cricket club can rely on during these later hours if needed, and as would be expected in any event.
- 6.192 The scheme is therefore compliant with BRE guidance in terms of overshadowing impacts.
- 6.193 On this basis, the proposed development is therefore considered to have a very high level of compliance for an urban location, and is therefore considered to be acceptable in terms of daylight, sunlight and overshadowing to neighbouring properties.

Noise & Privacy

- 6.194 A Noise Assessment, prepared by Hawkins Environmental, has been submitted in support of this planning application. The Assessment outlines that a baseline noise survey has been carried out to understand the existing noise context, as well as a detailed noise measurement study during a Welling FC football match, so as to understand the noise circumstances during matchdays.
- 6.195 The matchday survey determines that noise from spectators arriving/leaving the game did not result in an audible change in the acoustic environment since the noise climate to the front of the site was dominated by road traffic noise. The Assessment further notes that with larger

crowds reaching the stadium's maximum capacity, anticipated noise generation would likely be less than the noise generated by Park View Road and is therefore not expected to be an issue. Noise from food and beverage outlets was also considered to not be audible.

- 6.196 In any event, the proposals are simply to reprovide and enhance the existing facilities, and does not result in an increased stadium capacity, and therefore the proposed stadium use is therefore not considered to result in a worsened noise impact to neighbouring properties when compared to the existing situation.
- 6.197 The Assessment makes recommendations which will need to be accounted in the detailed design going forward, including limitations to the club's PA system, and management/design recommendations for the club bar, which should result in an improvement over the existing situation.
- 6.198 With regard to commercial uses, the Assessment notes that given that relatively small shops on a suburban would not be expected to be particularly noisy, plus would only typically be expected to be open during typical working hours, it would be anticipated that no additional sound impacts would be generated to neighbouring residents.
- 6.199 The Assessment also sets plant noise limits to below background noise levels, and therefore no more than 58 dB(A) during the day and 38 dB(A) during the night at the closest residential property; future plant will need to conform with this requirement, and this can be suitably conditioned.
- 6.200 Finally, the Assessment also includes recommendations around construction, so as to minimise construction noise impacts for existing residents.
- 6.201 On this basis, the Assessment concludes that planning consent may be granted, subject to the inclusion of suitable noise conditions, to ensure suitable internal and external noise levels.

Floodlighting

- 6.202 A Lighting Assessment, prepared by Kingfisher Lighting, has been submitted in support of this planning application. As part of the Assessment, a detailed site visit to record existing light levels was undertaken, and compared with the proposed lighting strategy.
- 6.203 Whilst the proposals will not achieve the relevant lux criteria, this is as a result of the site's characteristics and, as outlined in the Assessment, the proposals will nevertheless result in a betterment to neighbouring properties compared to the existing lighting. The Assessment

confirms that vertical levels provided by a new LED installation at the same height as taken on site currently on the north, south and west boundaries have been reduced. For example, the highest existing level on the Southern tree boundary is 243Lux at 2m, whilst the highest vertical level at the same height for the proposals is 65Lux.

- 6.204 The Assessment further outlines that the adjoining Bexleyheath Cricket pitch will not be adversely affected by the proposed lighting. LED fittings are more efficient at controlling light spill than the current light source on site, which should reduce any nuisance lighting currently spilling over, and the proposed LED fittings have also been directed specifically to minimise any spill.
- 6.205 Further detail on lighting proposals, as well as the hours of use, can be suitably secured via condition and/or legal agreement. As such, it is therefore considered that the proposed lighting will have an acceptable impact on future residents.

Construction Impacts

- 6.206 Finally, a Construction Phase Plan, prepared by BPM Project Management, has been submitted as part of this planning application. The Plan sets out the measures to be put in place during the construction phase, including measures to ensure there are no undue impacts to neighbours with regard to noise, dust, vibration, odours and pollution.
- 6.207 It is considered that adherence to the Construction Phase Plan can be secured via condition; on this basis, the proposed construction impacts are therefore considered to be suitably mitigated.

K. TRANSPORT, ACCESS & SERVICING

- 6.208 Policy T1 of the London Plan seeks to achieve a target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. The policy further notes that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 6.209 Policy T4 of the London Plan states that development proposals should not increase road danger, and should reflect and be integrated with current and planned transport access, capacity and connectivity.

- 6.210 Policy T4 of the London Plan requires the submission of Travel Plans for planning applications, having regard to TfL guidance.
- 6.211 Policy SP10 of the LBB Local Plan encourages walking and cycling within the borough, including through the provision of facilities within development proposals, and also encourages a new transitional approach to providing and managing residential car parking within new developments in areas where parking demands and provision could both reduce over time as more sustainable means of connectivity are improved.
- 6.212 Policy DP22 of the LBB Local Plan expects to see measures in all development proposals that facilitate and promote walking, cycling, public transport and shared mobility. The Policy also expects developments to contribute positively to an integrated cycling network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable.
- 6.213 LBB Local Plan Policy DP24 supports proposals that reduce the need to travel and improve access to sustainable modes of transport, and that do not have a significant negative effect on the safety of any users, including vulnerable users of the transport network such as pedestrians and cyclists.
- 6.214 LBB Local Plan Policy SP12 states that in new development, make resource use more efficient; b. reduce the production of waste; c. maximise the recycling of waste; and d. identify alternative business models.
- 6.215 LBB Local Plan Policy DP26 states that residential development proposals should ensure that:
- there is 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;
 - there is adequate communal storage for waste, including separate recyclables, pending its collection;
 - 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

Trip Generation & Impact on Highways & Public Transport

- 6.216 A Transport Assessment, prepared by Motion, has been submitted as part of this application. As part of the Assessment, a calculation of likely vehicle movements and trip generation from the proposed development has been undertaken.
- 6.217 Given the proposals is essentially car-free, vehicular trips associated with the development are considered to be limited.
- 6.218 With regard to the residential element, the Assessment finds that the flats could generate 44 morning and 40 evening peak hour total person trips, of which 10 would be vehicular in the morning peak and 11 vehicular in the evening peak. Across a total weekday daily movements, there could be 413 total person trips, of which, 101 could be vehicular. The Assessment considers this is not a substantial increase in vehicular trips, and indeed represents a robust scenario as it includes sites with dedicated car parking on site. Additionally, with the robust mitigation measures proposed in the Assessment, it is considered likely that this level of traffic flow will materially reduce over time.
- 6.219 Additionally, with regard to the proposed commercial units, no material trip generation is considered to result from these units, given they are small and do not have any car parking associated with them.
- 6.220 With regard to the stadium use, the proposed stadium will enable up to 4,044 spectators to attend a game, although it is not anticipated that this level of attendance would be reached in the short or medium term. However, it future proofs the scheme.
- 6.221 In order to manage events at the ground which may result in transport constraints, an Event Management Plan (EMP), prepared by Motion, has been submitted as part of this application. The EMP serves as a framework for events and match day operations at the ground, and outlines the management, protocol and process for these. The Plan also includes incentives to encourage travel by non-car modes, as well as off-road car parking locations which could be used on match days when spectator numbers exceed current levels.
- 6.222 The EMP is a live document, which will be updated as necessary with information as the stadium reopens and the management strategy evolves. It is considered that a detailed/live Event Management Plan can be suitably secured via condition or legal agreement tied to the permission.

- 6.223 It is considered that the package of measures, in tandem with the findings of the Transport Assessment and the applicant's agreement with the nearby Learning and Enterprise College for 100 spaces for events exceeding capacity, will ensure that highway impacts generated by the proposed development are suitably mitigated.
- 6.224 Finally, an assessment of the stadium/pitch use on a typical day, based on the indicative pitch schedule prepared by WUFC and the applicant team, confirms that no material change to transport impacts is anticipated; additionally, traffic flow will be managed to minimise impacts, in line with the Stadium Travel Plan.
- 6.225 On this basis, the proposed development is therefore considered to be acceptable with regard to trip generation and impacts on highways and public transport.

Deliveries, Refuse & Servicing

- 6.226 As set out in the accompanying Transport Assessment, it is proposed that there will be a new servicing bay provided on Park View Road, adjacent to the frontage of the football stadium. This will enable servicing vehicles to stop temporarily while they unload and prevent conflict with other traffic.
- 6.227 A Traffic Management Order will be required to amend the existing road markings and ensure that the bay is utilised for short-stay use only. It is envisaged that the bay will operate as 'Loading Only' with a limit on the maximum duration of stay (potentially 30 minutes). This will aid in ensuring turnover of the space to maximise usage for both the residential flats and the football stadium.
- 6.228 Vehicle tracking of appropriate vehicles (HGVs and a bus) are included within the Transport Statement. This highlights how all vehicles can remain within the westbound carriageway despite the one metre reduction in the effective carriageway width.
- 6.229 Refuse storage will be provided on site to meet the needs of both the residential flats, as well as the commercial unit and club storage requirements. All bin stores are located at ground floor, and are considered to be within an appropriate distance of the servicing bay.
- 6.230 Comments have been raised by Highways officers at the pre-application stage in respect of access to the ability for a car transporter to continue servicing a car sales centre on the northern side of Park View Road. Currently this takes place east of the bus stop fronting the site. By retaining the bus stop in its current location, it is considered that the transporter can stop in its current location. There is sufficient space for all vehicles (including a bus) to pass around a

transporter if stopped in the highway, and indeed this is an existing situation that the proposals would not alter.

- 6.231 With regard to emergency access, the existing eastern access will be retained to provide access for emergency vehicles onto the pitch. There is sufficient space to enable an ambulance to enter the pitch via this access. In addition, a permanent ambulance parking space is provided within the car park accessed via Roseacre. This ensures access for an ambulance at all times (when not required on the pitch).
- 6.232 A Delivery and Servicing Plan, prepared by Motion, has also been included in support of this application, and has been prepared having regard to guidance provided by TfL in the document “Delivery and Servicing Plans, Making freight work for you”. The Plan sets out detail in respect of deliveries and servicing for the proposed development, and appropriate measures to avoid potential concerns.
- 6.233 On the basis of the above and the recommendations of the Delivery and Servicing Plan, the proposed development is considered to be acceptable with regard to deliveries and servicing.

Active Travel Zone Assessment

- 6.234 An Active Travel Zone Assessment, prepared by Motion, has been submitted as part of this planning application. The Assessment determines the level of accessibility of the site with regard to active travel opportunities, and in line with Transport for London (TfL) guidance.
- 6.235 The Assessment determines that the area surrounding the site is a good location to follow the healthy streets approach due to its proximity to amenities and public transport links with regular services. However, the Assessment identifies four points which can be improved to fulfil the Healthy Street criteria, as follows:
- Point 1 – The crossing on Roseacre Road, Route 1 may be improved with the presence of tactile paving;
 - Point 2 – The Crossing on Bellgrove Road, Route 2 may be improved by re-painting the crossing markings, which makes people safer and crossing easier;
 - Point 3 – The Cycle Lane on Park View Road, Route 3 may be improved by re-painting the cycle lane markings, which makes pedestrians and cyclists safer; and
 - Point 4 – The lack of crossing at Foster’s Primary School, Route 4 may be improved by introducing a new crossing area in addition to the ‘Keep Clear’ road markings.

6.236 It is considered that the improvements can be secured via legal agreement tied to the planning permission; on this basis, the proposed development is therefore considered to align with the Healthy Streets Approach.

Travel Plan

6.237 Residential and Stadium Travel Plans, prepared by Motion, have been submitted as part of this application. The Travel Plans seek to promote the use of sustainable transport methods, and it is expected that the Travel Plan requirements will be secured as part of the S106 legal agreement.

6.238 On this basis, the proposal is therefore considered to have addressed the requirement for a Travel Plan and promoted the use of sustainable methods of transport.

Construction Transport & Logistics

6.239 Finally, a Construction Traffic Management Plan has been submitted to support this planning application. The Plan outlines the approach to transport logistics for the construction and demolition of the proposals. Through adherence to the Plan, the proposals will minimise the effects of construction traffic and consequently have an acceptable impact on the public highway during construction works. It is considered that adherence to the Construction Logistics Plan can be secured via condition and, on this basis, the proposed development is therefore acceptable.

6.240 The proposed development is therefore considered to be acceptable in terms of highway impacts.

L. CAR & CYCLE PARKING

6.241 London Plan Policy T6.1 states that residential development should not exceed the maximum parking standards set out in Table 10.3. Table 10.3 sets the following maximum standards for development in Outer London (PTAL 2-3):

- 1-2 bedroom dwelling: Up to 0.75 spaces per dwelling; and
- 3+ bedroom dwellings: Up to 1 space per dwelling.

6.242 London Plan Policy T6.3 sets a maximum standard of up to 1 car parking space per 75 sqm (GIA) of retail floorspace, but caveats that boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence

that the standards would result in a diversion of demand from town centres to out-of-town centres, undermining the town centres first approach.

6.243 No car parking standards are provided in policy for stadiums; however, Policy T6.4 of the London Plan states that, in locations of PTAL 0-3, leisure schemes should be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.

6.244 Policy T5 of the London Plan sets the following minimum requirements for cycle parking for development:

Use	Long-Stay	Short-Stay
C3 (Residential)	<ul style="list-style-type: none"> 1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per 2 person 1 bedroom dwelling 2 spaces per all other dwellings 	<ul style="list-style-type: none"> 5 to 40 dwellings: 2 spaces Thereafter: 1 space per 40 dwellings
A1 (Food retail above 100sqm)	1 space per 175 sqm gross external area (GEA)	with higher cycle parking standards: <ul style="list-style-type: none"> first 750 sqm: 1 space per 20 sqm; thereafter: 1 space per 150 sqm (GEA)
A2-A5	1 space per 175 sqm (GEA)	with higher cycle parking standards: <ul style="list-style-type: none"> 1 space per 20 sqm (GEA).
B1 (Business Offices)	with higher cycle parking standards: <ul style="list-style-type: none"> 1 space per 75 sqm (GEA). 	<ul style="list-style-type: none"> first 5,000 sqm: 1 space per 500 sqm; thereafter: 1 space per 5,000 sqm (GEA)

6.245 No cycle parking standards are provided in policy for stadiums.

6.246 LBB Local Plan Policy DP22 requires developments to provide secure, integrated, convenient and accessible cycle parking facilities in line with the standards set out in the London Plan, as a minimum.

- 6.247 Policy DP22 also seeks the provision of electric vehicle charging infrastructure in line with London Plan minimum standards, as well as spaces for car clubs, to be made publicly available where possible.
- 6.248 Policy DP23 of the LBB Local Plan expects development to provide parking within the lowest applicable maximum London Plan standards, with some divergence allowed in special circumstances.
- 6.249 Policy DP23 further states that parking provision materially below London Plan maximum standards may be acceptable in areas that have a PTAL of 3 – 4, for residential development sites that are outside of a Controlled Parking Zone (CPZ) or Restricted Parking Zone (RPZ), where it can be demonstrated through a parking survey that there is sufficient on-street, off-site parking capacity within 200 metres of the development boundary.

Residential

- 6.250 The residential element proposed development is essentially car-free. 8 disabled car parking spaces will be provided for residents; of these eight spaces, 6 will be on-site, accessed via Roseacre Road, whilst 2 additional spaces will be located on-street, on Roseacre Road.
- 6.251 The proposed development therefore provides 7.7% of disabled parking provision, in excess of the 3% requirement set out in the London Plan. With regard to the London Plan requirement to provide up to 10% in the future, the Transport Assessment confirms, based on car ownership, that some 44% of units in the surrounding area do not own a car. Based on the above, demand for an accessible space would likely be 7 cars for 11 wheelchair accessible units. Given the proposals include 8 disabled car parking spaces, in excess of the 7 cars anticipated, no further accessible parking is considered necessary to meet the demands of the development.
- 6.252 The proposed development also includes 2 active and 6 passive EV charging spaces for these eight disabled spaces, in line with London Plan policy requirements.
- 6.253 The proposed development will deliver a compliant level of long and short-stay cycle parking. 202 long-stay cycle parking will be provided in the basement, along with 4 short-stay spaces on Sheffield hoops in the public realm, on Park View Road.
- 6.254 The 202 long-stay spaces will be comprised of 70% stackers, 30% Sheffield stands, and 5% of which can accommodate oversized bikes, in line with London Cycle Design Standards and TfL preference.

Non-Residential

- 6.255 The proposed commercial units are car-free, and will not have any car parking associated with its use.
- 6.256 The proposed development will deliver a compliant level of long-stay cycle parking for the commercial uses. 5 long-stay spaces, comprised of 5 Sheffield stands and one oversized space, will be provided in a secure store, accessed via Roseacre Road. Short-stay spaces are also located on Park View Road in the form of Sheffield stands.

WUFC Stadium

- 6.257 The proposed WUFC stadium will not have any car parking associated with its use; however, as noted above, the applicant has secured an agreement with the nearby Learning and Enterprise College for 100 spaces for stadium events exceeding capacity.
- 6.258 Whilst there are no policy requirements for this, the proposed development will deliver 75 cycle parking spaces for club employees, players, coaches, and visitors. This will encourage and enable people to travel and from stadium by bicycle, and therefore in a more sustainable way.

Parking Stress

- 6.259 In order to support the car-free nature of the scheme, the Transport Assessment includes an assessment of local parking capacity, and determines whether the proposed development would result in an inappropriate increase in parking stress in the locality.
- 6.260 The Assessment determines that an overall increase of 61 vehicles could be generated from the proposed residential element; however, with the introduction of 2 car club spaces/vehicles, it is considered possible that the scheme could lead to an overall increase of only 17 cars on-street.
- 6.261 A Parking Beat Survey has been carried out in accordance with the 'Lambeth Council Parking Survey Guidance Note' (Lambeth Council, 2009), and the scope of surveys has been agreed with LBB Highways officers. The busiest time period recorded was a Tuesday evening when the football match was taking place.
- 6.262 The results of the Parking Beat Survey indicate that on-street parking stress is below the 85% threshold that classifies a road network as being under parking 'stress' at all assessed times

(Monday night; Tuesday night; Tuesday evening matchday; Saturday pre-matchday; Saturday post-matchday).

- 6.263 The Assessment then calculates parking stress with the additional 61 vehicles generated from the residential element, and determines that there is capacity on-street to accommodate parking demand associated with the residential element of the proposal within a 500-metre radius of the site, with parking stress remaining under 85%. This is further improved if the mitigation measures result in a reduction to 17 on-street cars, as previously assumed.
- 6.264 As requested by officers, a further assessment of on-street parking impacts within 200m has been carried out; this assessment determines that there remains sufficient spare capacity to accommodate residential parking demand on-street overnight within a 200m radius to accommodate the additional 17 on-street cars, with effective mitigation in place.
- 6.265 Should the full 61 additional vehicles be generated, this would exceed the 85% threshold due to a limited number of spaces within the 200m radius. However, by examining the parking stress map, it is evident that there are a number of roads within 200-300 metres of the site with generous spare capacity overnight. This includes Danson Lane, Nags Head Lane, Park View Road, Roseacre Road, Springfield Road and Westbrooke Road.
- 6.266 On the basis of the above, it could well be that some existing parking demand is relocated further from the site. However, the spare capacity around 200-300 metres from the site would mean that any displaced existing parking is unlikely to be displaced beyond the 200-metre distance generally accepted to be around the limit of what people are prepared to walk from their homes.
- 6.267 It is therefore considered that there is sufficient spare capacity to accommodate residential parking demand on-street overnight. Additionally, with the addition of 2 car club spaces, this demand is likely to reduce further.
- 6.268 Finally, an assessment of the combined impact of residential and stadium uses has been undertaken. On-street parking demand has been assessed during two football matches, a Tuesday evening and a Saturday afternoon.
- 6.269 From the beat surveys, the Tuesday evening survey recorded a total of 136 additional vehicles than that recorded overnight, and the Saturday survey during the match recorded a total of 82 additional vehicles than compared to the midday survey.

- 6.270 Adding the 61 vehicles associated with the flats would result in parking demand increasing beyond 85% on Tuesday evening matchdays (90.5%), but not on Saturday matchdays (84.2%). This also remains the case if residential vehicles are assumed to be 17 with effective mitigation in place.
- 6.271 As such, it is evident that parking demand by spectators needs to be managed more robustly, with the inclusion of a Management Plan during match days to seek to reduce current on-street parking demand for spectators especially during a weekday evening match. Whilst less relevant to current Saturday matches, the management of events is still required should spectator numbers materially increase in the future.
- 6.272 From interview surveys taken during the relevant matchdays, it has been determined that parking stress would be exceeded when spectator attendance exceeds 453 for a weekday match, and 1,047 for a Saturday afternoon match.
- 6.273 Additionally, a calculation has been undertaken of additional cars generated in the event maximum capacity is achieved (4,044 spectators), which determines this would result in a need to accommodate 701 cars within off-street parking spaces on a weekday evening, and 468 cars on a Saturday.
- 6.274 Whilst it is not envisaged an event of this scale will take place in the short or medium term, the proposed development and application has ensured this is addressed as a worst-case scenario:
- As previously stated, the applicant has secured an agreement with the nearby Learning and Enterprise College for 100 spaces for stadium events exceeding capacity, so as to mitigate vehicular trips;
 - Additionally, as noted above, in order to manage events at the ground which may result in transport and parking constraints, an Event Management Plan (EMP), prepared by Motion, has been submitted as part of this application. The EMP serves as a framework for events and match day operations at the ground, and outlines the management, protocol and process for these. The Plan also includes incentives to encourage travel by non-car modes, as well as off-road car parking locations which could be used on match days when spectator numbers exceed current levels.
- 6.275 Other mitigation measures as proposed to improve the existing arrangement, including Framework Travel Plans, an Active Travel Zone Assessment and recommended improvements, Enterprise Car Club provision, a Delivery and Servicing Plan, and a Construction Logistics Plan. These measures will help further reduce reliance on the car, and consequently lessen parking stress.

6.276 On this basis, the Transport Assessment therefore concludes that:

- There is capacity to accommodate parking demand from the proposed residential units; and
- A robust set of mitigation measures are proposed to address the additional parking demand generated from the residential and stadium uses.

6.277 The impacts of the proposed development on local parking capacity are therefore considered acceptable with appropriate mitigation, which can be secured via condition and/or legal agreement.

M. ENERGY & SUSTAINABILITY

6.278 London Plan Policy SI 2 defines targets for CO₂ emission reductions over the Target Emission Rate (TER) outlined within the building regulations, Part L 2013. This policy sets out the requirement for major development proposals to include a detailed energy assessment to demonstrate how a minimum of 35% on-site CO₂ reduction is achieved using the 'Be Lean, Be Clean, Be Green, Be Seen' energy hierarchy, with any additional offset to meet the zero-carbon target to be delivered via on-site provision or contributions.

6.279 Policy SP1 of the LBB Local Plan seeks to protect and enhance the natural and built environment by adapting to and mitigating the impacts of climate change.

6.280 Policy SI 7 of the London Plan requires Circular Economy Statements to be submitted with referable applications. Policy SI 7 further promotes minimising waste, reusing materials, and recycling. It aims to meet or exceed the following targets:

- zero biodegradable or recyclable waste to landfill by 2026;
- reuse/recycle/recover 95% of construction and demolition waste; and
- beneficial use of 95% of excavation waste (though all inert excavation waste should be put to beneficial uses). Beneficial use includes placement to land in a way that provides environmental benefits such as restoration of priority habitat or flood alleviation.

6.281 LBB Local Plan Policy DP1 states that housing development must achieve relevant London Plan space, accessibility, environmental, and housing amenity standards, having regard to published guidance.

6.282 Policy SP12 of the Bexley Local Plan supports the development of the circular economy by encouraging the waste and construction industries to:

- make resource use more efficient;
- reduce the production of waste;
- maximise the recycling of waste; and
- identify alternative business models.

6.283 LBB Local Plan Policy SP14 states that the Council will pursue the delivery of sustainable development by:

- supporting developments that achieve zero-carbon and demonstrate a commitment to drive down greenhouse gas emissions to net zero;
- supporting new and enhanced green infrastructure, including greening of development sites such as living roofs.

6.284 LBB Local Plan Policy DP30 states that major development proposals must meet London Plan requirements and calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

6.285 Policy DP30 further expects, where possible:

- New homes be designed to achieve:
 - BREEAM Home Quality Mark (HQM), or
 - BREEAM Communities standards (for major housing-led mixed-use development), or
 - Passivhaus, or
 - Other appropriate sustainability measures.
- new non-residential development, refurbishment of existing buildings, and conversions, over 500m² floor space (gross) must meet or exceed BREEAM 'excellent' rating'; and
- minor non-residential development achieves a BREEAM 'Very Good' rating.

6.286 Policy DP30 also states that development must be designed to be water efficient and reduce water consumption. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits.

Energy

- 6.287 An Energy and Sustainability Strategy, prepared by Mendick Waring Ltd, has been submitted in support of this application. The document sets out the energy strategy for the proposals and aims to demonstrate that energy strategy objectives defined by national, regional and local policies are met by the proposed strategy for the site.
- 6.288 The Strategy outlines that the proposals have followed a best-practice approach, based on the Mayor's Energy Hierarchy of 'Be Lean, Be Clean, Be Green'.
- 6.289 A fabric first approach will be followed, incorporating passive design measures such as low u-values, low air leakage and low thermal bridging. Active design measures have then incorporated via energy efficient building services, such as 100% low energy lighting, and mechanical ventilation with heat recovery (MVHR).
- 6.290 The Strategy includes an assessment of potential energy sources, and confirms that connection to a District Heating Network, wind energy, ground source heat pumps, biomass, CHP, and solar thermal collectors are not viable options, leaving photovoltaics and air source heat pumps as the only viable solutions.
- 6.291 On this basis, the residential units will benefit from a communal ASHP systems to provide heating and hot water, supplied to the dwellings via HIUs. Roof mounted photovoltaic panels will be used to generate a portion of the electricity demand. Heating and cooling will be provided to the commercial spaces via efficient individual split VRV systems.
- 6.292 The SAP/SBEM methodology has been used to calculate the energy consumption and resultant CO2 emissions for the proposed development. From this assessment, the Strategy confirms the following:
- By incorporating a combination of all the feasible passive measures and high efficiency services, along with the use of PV Panels, the CO2 emissions of the residential units have been reduced by 71%; and
 - By incorporating a combination of all the feasible passive measures along with the use of efficient individual split VRV, the shell & core commercial spaces have achieved a CO2 reduction of 37% over Part L of Building Regulations.
- 6.293 On this basis, by incorporating a combination of all the feasible passive measures along with the use of the above efficient heating & hot water systems and PV Panels, the sitewide CO2

emissions of the development have been reduced by 62% (in excess of the 35% policy requirement).

6.294 A Carbon Offset contribution will be delivered to achieve zero carbon, in line with London Plan policy.

6.295 The proposed development is therefore considered to be policy compliant and acceptable in terms of energy.

Sustainability

6.296 The submitted Energy and Sustainability Strategy demonstrates that the proposed development has taken the core principles of sustainable development into account within the context of the site.

6.297 The Strategy confirms that, through the use of water saving fittings, internal potable water consumption will be reduced to less than 105 litres per person per day, as required by policy. Further detail on the water saving fittings is provided in the accompanying report.

6.298 With regard to BREEAM, it is not feasible to implement the measures sought by BREEAM in small commercial units (under 500 sq.m). Given the proposed commercial units are small (around 100sqm), it is considered appropriate not to apply BREEAM requirements accordingly. Additionally, it is not considered that the proposed WUFC uses should be required to comply with BREEAM requirements.

6.299 On this basis, the proposals are therefore considered to be acceptable in terms of sustainability, and have been carefully designed to appropriately maximise sustainability.

Circular Economy & Whole-Life Carbon

6.300 A Circular Economy Statement has been submitted in support of this planning application, which aims to demonstrate that the proposed development has considered, and will incorporate, circular economy principles into all aspects of the design, construction, and operation process.

6.301 Additionally, a Whole Life Cycle Carbon Assessment has been submitted as part of this planning application. The Assessment summarises the results of the work undertaken to minimise carbon emissions over the life of the development, in line with GLA guidance.

Site Waste Management Plan

- 6.302 A Site Waste Management Plan has also been submitted to support this planning application, and enclosed within the Construction Phase Plan. The Plan seeks to forecast how much excavation, demolition, and construction waste might arise, set out ways to minimise and manage this waste and outline waste minimisation and management measures and performance targets for the construction phase.
- 6.303 On this basis, the proposed development is therefore considered to be acceptable in terms of energy and sustainability.

N. BIODIVERSITY, ECOLOGY & TREES

- 6.304 Policy G5 of the London Plan outlines that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Additionally, residential developments should achieve a target Urban Greening Factor (UGF) score of 0.4.
- 6.305 Policy G6 of the London Plan requires development to manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 6.306 Policy G6 also seeks to protect Sites of Importance for Nature Conservation (SINCs).
- 6.307 Policy G7 of the London Plan states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by an appropriate valuation system. The planting of additional trees should generally be included in new developments.
- 6.308 Policy SP8 of the Bexley Local Plan seeks to ensure that all new developments deliver a net increase to green infrastructure.
- 6.309 LBB Local Plan Policy SP9 states that the Council will protect and enhance the borough's biodiversity and geodiversity assets, in line with national and regional policy, by:
- protecting, conserving, restoring, and enhancing ecological networks, Sites of Importance for Nature Conservation (SINC), Local Nature Reserves, Strategic Green Wildlife Corridors

and local wildlife corridors, thus securing measurable net gains for biodiversity, recognising and promoting those sites where ecological value has increased to a higher grade of nature conservation importance;

- resisting development that will have a significant adverse impact on the population or conservation status of protected or priority species as identified by legislation or in biodiversity action plans prepared at national, regional or local level;
- protecting and enhancing the natural environment, seeking biodiversity enhancements, net gains for biodiversity and improved access to nature, through new development and projects that help deliver opportunities for green infrastructure with preference given to enhancements that help to deliver the targets for habitats and species set out in the London Plan and local biodiversity action plans and strategies; ensuring landscaping schemes in development proposals use native plant species of local provenance; and,
- seeking opportunities to provide for greening of the built environment.

6.310 Policy DP20 of the Bexley Local Plan states that proposals will only be permitted where it can be demonstrated that:

- a strict approach to the mitigation hierarchy has been taken (i.e. avoid, mitigate, compensate and net gain) and all unavoidable impacts on biodiversity can be justified;
- completion of the development will result in a measurable long-term net gain for biodiversity, as demonstrated through the application of an acceptable method of measurement, and/or impact assessments; and
- biodiversity enhancement measures and where appropriate mitigation measures have been incorporated within the design, layout and materials used in the built structure and landscaping.

6.311 Policy DP20 further states that proposals that would have a direct or indirect impact on a site designated for its nature conservation or geological interest should protect and enhance the designated site's value, and will not be permitted unless all of the following criteria are met:

- there are no reasonable, less damaging, alternative solutions, locations or sites;
- ecological buffer zones have been incorporated into the scheme, where appropriate, to protect and enhance the designated site's intrinsic value;
- the continuity of wildlife habitat within wildlife corridors is maintained; and,
- access to the designated site is not compromised and where possible, access and/or interpretation is improved.

6.312 Policy DP21 of the LBB Local Plan notes that proposals should set out what measures have been taken to achieve urban greening onsite; and all new major developments should quantify what urban greening factor (UGF) score has been achieved.

6.313 Policy DP21 further states that there will be a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerow cover on site; and planning permission will not normally be permitted where the proposal adversely affects important trees, woodlands, or hedgerows.

Biodiversity & Ecology

6.314 In order to assess the biodiversity value of the existing site and surroundings, a Extended Phase 1 Habitat Survey and Bat Survey Report have been carried out by AEWC.

6.315 The Extended Phase 1 Habitat Survey has determined that there are no significant impacts to the fauna or flora populations within the local area from the proposed works provided recommendations are adhered to. Detailed findings of the appraisal are set out in the accompanying report, and are summarised below:

- Badgers: The survey did not identify any direct evidence of badgers on the site and no setts were identified present within 30m of the site boundary. No further surveys for badgers are considered necessary;
- Breeding Birds: Vegetation or tree removal should be undertaken outside the breeding bird period from March to August. Should any vegetation clearance be scheduled to take place between the beginning of March and the end of August, this must be immediately preceded by a survey to check for nesting birds. No vegetation can be cleared whilst a nest is occupied, regardless of species;
- Great Crested Newts: Due to the limited suitable habitat on site, the distance to the only suitable pond within 500m and the results of the rapid risk assessment, the site is considered unlikely to be used by great crested newts, and therefore no further surveys or mitigation for this species is required;
- Hazel Dormice: Whilst deciduous woodland is present on site, the area of woodland is very small, and it lacks continuous understorey. Foraging opportunities are considered limited, as is full connectivity to the adjacent larger areas of woodland to the south. The site is considered unlikely to be used by hazel dormouse and therefore no further surveys for this species are required;
- Reptiles: no reptiles or amphibians were identified present, and it is therefore considered unlikely that notable populations of reptiles are present using the site and no further surveys

for reptiles are considered necessary. A precautionary approach to site clearance must be adopted and reptile method statement followed.

- Bats: Building 1 and Buildings 3 to 10 were found to have negligible suitability for roosting bats due to a lack of suitable roosting features and therefore there are considered to be no constraints regarding the demolition of these buildings. Building 2 was identified as having low potential to support roosting bats due to the presence of gaps at the fascia on the eastern elevation. A minimum of one emergence survey is therefore required, to confirm presence or increase confidence in a result of likely absence of bats.

6.316 The Bat Survey Report sets out the findings of the bat survey carried out subsequent to the phase 1 habitat survey, which identified that Building 2 has low potential to support roosting bats due to the presence of gaps at the fascia on the eastern elevation. The Report outlines that bats were not found during the emergence survey and, as such, there are no known constraints regarding these species and the proposed development.

6.317 A Biodiversity Net Gain Assessment Report, prepared by AEWC, has been submitted in support of this application. The Assessment confirms that the proposals result in a loss of 33.12% for habitats, and that the trading rules cannot be satisfied as deciduous woodland is being lost from the site and not replaced.

6.318 However, it is important to note that a significant proportion of the habitat loss is due to the replacement of the existing grass pitch with an artificial 3G pitch, which is a requirement for WUFC. Should the pitch be retained as a grass pitch, as opposed to a 3G artificial pitch, the proposals would result in a 39.12% increase in biodiversity, significantly in excess of the 10% requirement.

6.319 The existing grass pitch, whilst having a positive impact in terms of the DEFRA Statutory Biodiversity Metric, is not considered to have any actual biodiversity value. The pitch is regularly maintained and used as a playing surface, which significantly limits any actual biodiversity/species being capable of using it. As such, the proposed development is therefore considered to have a limited impact on biodiversity in reality, and actually results in an improvement if the existing grass pitch was not considered a valuable habitat on the DEFRA Statutory Biodiversity Metric.

6.320 Additionally, as set out in the Tree Survey and Arboricultural Impact Assessment (see below), the trees to be lost are generally of low value, which further limits biodiversity impacts.

6.321 The proposed lighting cannot be biodiversity and bat friendly or designed in accordance with the Institute of Lighting Professionals ('ILP') Guidance note 8: 'Bats and Artificial lighting in the

UK', as FA requirements are in conflict with this. However, given the lack of protected species identified in the accompanying reports, as well as the fact that the proposed lighting strategy will result in a betterment over the existing lighting, this is considered to be justified.

6.322 The relevant Bat Conservation Trust ILP Guidance states that '*the key in the first instance is to maintain or reduce existing light levels, and reduce blue content to protect the bat species present*', and relevant guidance therefore supports this position. Additionally, appropriate temperatures can be used to further limit impacts on bats.

6.323 On this basis, the proposals are therefore considered to be acceptable in terms of biodiversity, and will result in a noteworthy biodiversity net gain for the site in actuality.

Trees

6.324 A Tree Survey and Arboricultural Impact Assessment, prepared by Brindle and Green, has been submitted in support of this planning application. The report summarises any potential arboricultural impacts and outlines a tree protection plan in relation to the proposed development.

6.325 The report confirms that trees T2, T3, G4 and G5 are recommended for removal due to conflict with the proposed development. With the exception of the Category B group G5, all trees to be removed are Category C and of limited value and quality. These trees are all located on the western boundary of the site, at the intersection of the site with the Roseacre Road houses.

6.326 The report also confirms that the proposed development will have a minimal impact on the Category A group of trees W1, forming the southern boundary of the site. As such, the report concludes that the proposals will retain a harmonious relationship with the woodland, and retain this vital visual screening for the development to/from Danson Park.

6.327 The report also considers that the proposed landscaping strategy has maximised new planting to help offset the necessary removal, despite the spatial constraints of the site.

6.328 On this basis, the proposed development is therefore considered to be acceptable in respect of trees.

Urban Greening Factor

6.329 An Urban Greening Factor (UGF) calculation has been undertaken and enclosed within the Design and Access Statement; the calculation confirms that a UGF score of 0.136 is achieved.

6.330 Whilst the UGF score falls short of policy requirements, a separate assessment has been undertaken excluding the pitch area. The pitch is 3G and is a key requirement for WUFC going forward, and as such does not contribute to greening whilst reducing the UGF score substantially. The revised UGF score, excluding the pitch, amounts to 0.328; whilst this still falls short of the target score of 0.4 for predominately residential development, this is considered to be a high figure for the proposed development, and it is considered that the proposed development has been maximised with respect to urban greening.

6.331 Extensive green roofs have been provided where possible, and green walls have been proposed within the recesses along the rear elevation.

6.332 On this basis, the proposed development is therefore considered to be acceptable in greening terms.

O. FLOOD RISK & DRAINAGE

6.333 Policy SI 13 of the London Plan seeks to ensure that development proposals include SuDS to return water run-off rates back to greenfield levels and manage surface water runoff as close to source as possible. Policy SI 13 also sets out the drainage hierarchy which developments should adhere to.

6.334 Policy SP1 of the LBB Local Plan seeks to protect and enhance the natural and built environment by adapting to and mitigating the impacts of climate change, including flood risk.

6.335 LBB Local Plan Policy SP14 states that the Council will pursue the delivery of sustainable development by:

- applying the recommendations of Bexley's Strategic Flood Risk Assessment, Local Flood Risk Management Strategy, and Integrated Water Management Strategy;
- directing new development into the most sustainable locations by applying the flood risk sequential test across the borough and the exception test to the site allocations in this Local Plan;
- following the sequential approach to flood risk management advocated in national planning policy and its associated practice guidance; and
- working with the Environment Agency and others to ensure the recommendations of the TE2100 Plan are implemented in new and existing developments, to keep communities safe from flooding in a changing climate and improving the local environment.

- 6.336 Policy DP33 of the LBB Local Plan states that proposals, whether increasing or decreasing the impermeable area of the site, will be required to manage surface water through sustainable drainage systems (SuDS) in line with all national, regional and local policies and related guidance, in order to minimise flood risk, improve water quality and enhance biodiversity and amenity. Development proposals on sites of 0.25 hectares or greater require a drainage strategy, which must be accompanied by a suitable maintenance management plan.
- 6.337 Policy DP33 further outlines that all proposals will be required to demonstrate that:
- the drainage for the site achieves greenfield runoff rates for flood events up to and including 1 in 100 years plus 40% climate change;
 - surface water run-off has been reduced by sustainably managing run-off on site;
 - permeable paving has been used for hardstanding areas (e.g. car parks);
 - the nature of water flow (both surface water and groundwater) across a steeply sloping site has been considered in order to provide suitable SuDS; and,
 - water reuse mechanisms have been included for either indoor or outdoor purposes
- 6.338 A Flood Risk Assessment and Surface Water Drainage Strategy, prepared by Lustre, has been submitted in support of this application. The Assessment identifies and quantifies the flood risk at a site from a number of sources and demonstrate how flood risk will be managed now and over the development's lifetime, taking climate change into account, and with regard to the vulnerability of its users.
- 6.339 The Assessment has undertaken a review of various potential flood risk categories and determined that there is risk in relation to sewer flooding and surface water flooding. The development also confirms that the proposed development is appropriate in this location given the site is in Flood Zone 1.
- 6.340 The Assessment then provides an overview of the surface water drainage strategy for the proposals, in accordance with the drainage hierarchy set out in London Plan Policy SI13. The drainage strategy comprises the installation of an attenuation tank of approximately 550m³ at the northern end of the site, along with green/blue roofs.
- 6.341 Depending on the detailed design stage, the attenuation tank may possibly reduce in size, depending on the amount of attenuation provided by the roofs. Through the use of this strategy, however, surface water runoff will be limited to 2 l/s for a 100-year + 40% rainfall event.

6.342 Full detail in respect of the drainage strategy can be secured via condition. On this basis, the proposed development is therefore considered to be acceptable with regard to flood risk and drainage.

P. AIR QUALITY

6.343 London Plan Policy SI 1 states that developments should not:

- lead to further deterioration of existing poor air quality
- create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
- create unacceptable risk of high levels of exposure to poor air quality.

6.344 LBB Local Plan Policy SP8 seeks opportunities to support the functions and drivers for green infrastructure, such as using good urban design to reduce air pollution, integrating green infrastructure into development where there are opportunities to mitigate poor air quality on a local scale.

6.345 The Air Quality Neutral London Plan Guidance (LPG) document provides further detail on Air Quality Neutral requirements for relevant developments.

6.346 An Air Quality Assessment, prepared by Hawkins Environmental, has been submitted in support of this planning application. The Assessment addresses the effects of air pollutant emissions from traffic using the adjacent roads and emissions associated with the development of the site. In addition, a risk-based assessment of the likely impact of construction on the air quality of the local environment has been conducted.

6.347 From review of baseline air quality concentrations at the site and predicted future concentrations with the development in place, the Assessment determines that concentrations of NO₂ and PM₁₀ pollutants are below the National Air Quality Objectives in both scenarios, and are also more than 5% below the National Air Quality Objective level; therefore, the site is considered to be within Air Pollution Exposure Criteria (APEC) category APEC A. Air Quality and Planning Guidance, indicates that for APEC A, there are “No air quality grounds for refusal; however; mitigation of any emissions should be considered”. Additionally, the Assessment determines that hourly exceedances of NO₂ are not expected to occur. The Assessment also notes that the site will be located in the new ULEZ, which is likely to have further beneficial impacts on air quality.

- 6.348 On this basis, the Air Quality Assessment therefore determines that the impacts of the local area on the proposed development are acceptable.
- 6.349 The Assessment then determines the impacts of the proposed development on the local area, using trip generation data provided by the transport consultant, Motion. The results show that the impact of the increase in traffic flow is very small at the worst affected sensitive receptors, such that the percentage change in concentrations relative to AQAL is very small. Consequently, the proposed development will not have an impact on the air quality of the local area and the impact is considered to be “negligible”.
- 6.350 The Assessment also undertakes an assessment of Air Quality Neutrality, as required by London Plan policy, and determines that the proposed development is considered to be Air Quality Neutral with respect to building and transport emissions’; on this basis, the scheme is considered to be air quality neutral, in accordance with policy.
- 6.351 Finally, an assessment of construction impacts has been carried out. With regards to the impacts of construction on air quality, dust and other pollutant emissions from the construction and demolition phases of the construction of the proposed development, the site is designated as a “Medium Risk Site”. However, with risk-appropriate mitigation, residual effects will not be considered significant.
- 6.352 The Air Quality Assessment concludes that in terms of air quality, the proposals adhere to local and national planning policy, it is considered that air pollution should not be a constraint on the proposed residential development.

Q. FIRE SAFETY

- 6.353 Policy D12 of the London Plan states that development proposals must achieve the highest standards of fire safety. There are no relevant adopted or emerging LBBB policies.
- 6.354 To support the application, a Planning Fire Safety Strategy Report has been submitted to support this application. The Statement has been prepared by a suitably qualified person and has been prepared in accordance with the requirements of Policy D12(B), with the objective of ultimately complying with the London Plan. The Statement confirms that the development is designed to achieve high standards of fire safety.
- 6.355 In accordance with government guidance on fire safety and high-rise residential buildings (from 1 August 2021), a Gateway One Fire Statement has also been submitted as part of this application. The Statement follows the set template and provides the necessary information.

6.356 It is considered that a detailed fire evacuation strategy for the stadium use can be secured via condition, if required.

6.357 On this basis, the proposed development is considered to be acceptable in terms of fire safety, in accordance with the requirements of London Plan Policy D12 and relevant fire regulations.

R. UTILITIES

6.358 London Plan Policy SI 6 requires development proposals to provide sufficient internet and mobile connectivity for future users.

6.359 Policy SP7 of the LBB Local Plan seeks to ensure that developers contribute to the reasonable costs of new, expanded and/or improved services, facilities and open spaces made necessary by their development proposals through the use of planning obligations where appropriate and/or the community infrastructure levy.

6.360 LBB Local Plan Policy DP29 seeks to ensure that there is adequate water and wastewater infrastructure to serve all new developments.

6.361 A Utilities Assessment Report, prepared by Mendick Waring, has been submitted in support of this planning application. The Report assesses access to drainage, water, gas, electricity, and fibre services for the site, and concludes that utility services are available to serve the development including Electricity, Gas, Water and Fibre. The report also notes it is not envisaged that the existing residents will be unduly compromised by the development.

6.362 The Report confirms that detailed applications for these services will be developed and available within the next project stage to ascertain further detail on capacities, opportunities, and the extent of works needed.

S. CONTAMINATION

6.363 LBB Local Plan Policy DP28 states that where development is proposed on contaminated land or potentially contaminated land, a desktop study and site investigation, including appropriate proposals for remediation will need to be carried out where required.

6.364 A contamination Phase 1 Desk Study, prepared by Lustre Consulting, has been submitted in support of this planning application. The Study determines if potential contamination is present at a site, and importantly, if that contamination poses a risk to future site users or the environment, based on historical and current uses of the site.

6.365 The Study confirms that the following potential sources of contamination have been identified:

- On site – Made Ground, potential spills and leaks from parked vehicles and an electrical sub-station at the north of the site.
- On site – Existing heating oil tank and other hazardous materials storage on site.
- On site – Potential ACMs within the existing building fabrics on site.
- Off site – Active fuel station approximately 135m east.
- Off site – former site activities including a tramway directly north, nursery directly west, garage (now car dealership) approximately 35m north, depot approximately 40m north-east, tank approximately 50m west and a works approximately 65m north-east.

6.366 The Study further confirms that the following risks have been identified:

- A low to moderate risk has been identified to future residents and other site users including staff, spectators, and visitors from the Made Ground. A lower risk with regards to ground and construction workers is assumed due to occupational exposure and can be further reduced using appropriate PPE and other precautionary measures. The underlying Harwich Formation and London Clay Formation geological strata have a high to very low permeability and the vertical and lateral transmission of any contaminants on site is possible. Although the proposed end-use will comprise soft landscaping areas and a football pitch, significant Made Ground is not anticipated and both the lateral and vertical extent of any such materials is likely to be limited.
- A low to moderate risk has been identified to any perched groundwater within the Made Ground and Secondary A Aquifer on site.
- A low risk has been identified with regards to the adjacent land, flora, buried services and structures (including foundations and potable water pipes) from Made Ground on site. Aggressive ground conditions (sulphate and pH) may occur due to the presence of contamination within any Made Ground.

6.367 On this basis, the Study recommends the following measures to suitably mitigate risk.

- An asbestos survey, carried out by a licensed contractor, of the existing buildings and structures on site prior to demolition.
- Undertake a Phase 2 Site Investigation across the entire site area.
- Carry out a non-specialist watching brief for contamination during all groundworks.

6.368 It is considered that the above measures can be suitably secured via condition attached to the grant of planning permission. On that basis, the proposed development is considered to be acceptable in contamination terms.

T. PLANNING BENEFITS & BALANCE

6.369 LBB has a housing target of 6,850 new homes from 2019/20 to 2028/29, as per London Plan Table 4.1. The Housing Delivery Test results by Central Government (January 2022), whilst outdated, also highlight that LBB only delivered 93% of their target number of homes required.

6.370 The proposed development will help to address a historically-identified shortfall of housing delivery on a windfall site, whilst providing significant benefits which demonstrably outweigh identified harm.

6.371 As set out in Appendix 2 and further below in this note, Welling United FC are a key local institution, having been founded in 1963 and calling the Park View Road stadium its home since 1977. They have a strong local supporter base, and are regularly involved in local community initiatives and charitable partnerships. Appendix 2 of this Planning Statement sets out the club's history and involvement in local initiatives and organisations.

6.372 The existing facilities are in a very poor state of repair, as pictured in the accompanying Design and Access Statement. The changing rooms are inadequate for purposes, there are leakages due to the state of the roof, and there is little scope to improve the facilities due to income constraints.

6.373 The club has historically run at an operating loss, and consistently relied upon owner donations each season to survive financially and continue to function. The owner's forecast contribution for the current year is £460,000. Despite this, the Club is still operating at a loss, which is forecast at £77,000 for the current financial year. The Club is also investing approximately £36,000 per annum just on maintaining the existing stadium and facilities.

6.374 Additionally, the current facilities and grass pitch significantly limit opportunities for the wider teams within the Welling FC umbrella to play and train on-site; as a result, the numerous Academy, youth teams and other teams in the club are dispersed, and must rely on other pitches in the wider area.

6.375 The Academy are currently in the early stages of investigating a potential relocation to 176 Footscray Road SE9 2TF, the site of Eltham Town Football Club. This would enable the Academy to be more consolidated and avoid dispersion of their many teams; however, it is

anticipated that the development of this site would not provide sufficient capacity for the entirety of the Academy, and therefore that some additional capacity will be required elsewhere, off-site.

- 6.376 There is therefore an acute need for the site to be rejuvenated to enable the club to grow and maintain itself, which must be delivered through redevelopment of the site, due to financial circumstances. The proposed development will deliver new high-quality facilities, ensuring the long-term viability of Welling United FC.
- 6.377 Both LBB and the GLA have been supportive of the principle of redeveloping and enhancing WUFC's facilities at the site. In addition, relevant sports stakeholders, notably including Sport England, the London FA, Kent FA and Football Foundation, have been highly supportive of the proposed development (see Appendix 4 for stakeholder responses).
- 6.378 It is also important to note that the proposals have been located on previously developed land. The existing site is comprised of hardstanding along its borders, with the northern border being particularly extensive (where the proposed building will be primarily located, along Park View Road). Additionally, the existing site houses the existing WUFC two-storey stand and clubhouse along its western boundary; the proposed WUFC club facilities are proposed to be relocated in this area, and within a two-storey building extending beyond the West Wing. As such, the proposals will not be built on greenfield, and have been carefully positioned to minimise impacts.
- 6.379 For the reasons set out in the remainder of this Planning Statement and its appendices, the redevelopment of the site proposed under this application will deliver significant benefits and is considered to comprise sustainable development. Additionally, it is considered that a Very Special Circumstances case exists for the proposals, and that the development will not harm the criteria or purposes of the Green Belt and MOL, in line with the NPPF and London Plan.
- 6.380 The significant benefits provided by the scheme will demonstrably and considerably outweigh any harm, and the proposed development is considered to be broadly compliant with the Development Plan when considered as a whole.
- 6.381 On this basis, the proposed development is considered to comply with the aspirations of the NPPF, the London Plan and LBB's adopted Development Plan.

7 PLANNING OBLIGATIONS AND CIL

A. COMMUNITY INFRASTRUCTURE LEVY

7.1 The Mayor of London adopted the revised Mayoral CIL (MCIL2) charging schedule in February 2019 to help finance Crossrail 1 and Crossrail 2. As set out in the adopted MCIL2 Charging Schedule, LBB is located in MCIL2 Band 3, which has a charge of £25 per sqm for all development.

7.2 In addition, LBB adopted a CIL Charging Schedule in April 2015. In respect of the Site, it is located in CIL Zone 2; the relevant charges within this Zone are as follow:

- Residential: £60 per sqm;
- All other uses (excl. Residential; Hotel; Student Housing; Supermarket and superstore; and retail warehouse development): £10 per sqm

7.3 Section 155 of the Housing and Planning Act 2016 inserted Section 75ZA into the Town and Country Planning Act 1990 requiring the inclusion of information about financial benefits arising from developments to be included within any report made by an officer of the authority for the purposes of a non-delegated determination of an application for planning permission.

7.4 The financial benefits from the proposed development comprise £994,504 of local CIL contributions, as well as £355,398 in Mayoral CIL 2, for a total CIL contribution of £1,349,902.

B. PLANNING OBLIGATIONS & HEADS OF TERMS

7.5 The need for (and justification of) any planning obligations are to be considered on a case-by-case basis, having regard to the statutory 'tests' as now amplified within Regulation 122 of the Community Infrastructure Regulations. Planning Obligations must be:

7.6 Whilst Draft Heads of Terms have not been discussed in detail with officers prior to submission of the planning application, the following broad Heads of Terms are expected to be attached to the permission:

- Affordable housing provision / review mechanisms (subject to viability review);
- Community use of the facilities;
- Measures to ensure that the housing is only delivered in conjunction with the stadium improvements;

- Transport:
 - Measures to control parking and any associated contributions;
 - Travel Plan monitoring / penalty payments / bond;
 - Car Club provision and membership for residents;
 - Pedestrian / cycle improvements;
 - Off-site highway works;
 - Any public transport contributions requested by TfL;
 - Any other site-specific mitigation identified through the assessment of the scheme.
- Healthcare contribution to address impacts on GP surgery capacity – subject to NHS comments;
- Education contribution towards school places (if requested by Education team);
- Off-site play contribution to offset shortfall in on-site provision;
- Carbon Offset contribution;
- Air Quality mitigation/offsetting (to be confirmed with the Council);
- GLA energy 'Be Seen' monitoring clauses;
- Future connection to district heating networks;
- Biodiversity Net Gain mitigation;
- Contribution to mitigate effects of increased recreational usage of Danson Park;
- Contribution to mitigate impacts on SINC;
- Local employment clause; and
- Council's legal fees.

7.7 Following registration of the Planning Application, we will seek to finalise Heads of Terms with the Council's Planning Officer, to allow the expedient submission of a draft Legal Agreement, well in advance of the Planning Application being presented to planning committee.

8 CONCLUSION

8.1 This Planning Statement has been prepared on behalf of Woolwich Road Limited ('the applicant'), in partnership with Welling United FC, in support of an application for full planning permission for the redevelopment of the Welling United Football Club ('WUFC') Park View Road Stadium and 1-3 Park View Road, Welling DA16 1SY ('the site').

8.2 The proposed description of development is as follows:

'Redevelopment of the site to provide new Welling FC stadium and accompanying football facilities (Class F2), residential dwellings (Class C3) and commercial uses (Class E), along with associated public realm improvements, car and cycle parking, and refuse and recycling stores.' ("the development").

8.3 In accordance with section 38(6) of the PCPA, this Planning Statement demonstrates that the proposed development accords with the provisions of the Development Plan and identifies any key considerations material to the determination of this Application.

8.4 As set out in Appendix 2 and further below, Welling United FC are a key local institution, having been founded in 1963 and calling the Park View Road stadium its home since 1977. They have a strong local supporter base, and are regularly involved in local community initiatives and charitable partnerships. Appendix 2 of this Planning Statement sets out the club's history and involvement in local initiatives and organisations.

8.5 The existing facilities are in a very poor state of repair, as pictured in the accompanying Design and Access Statement. The changing rooms are inadequate for purposes, there are leakages due to the state of the roof, and there is little scope to improve the facilities due to income constraints.

8.6 The club has historically run at an operating loss, and consistently relied upon owner donations each season to survive financially and continue to function. The owner's forecast contribution for the current year is £460,000. Despite this, the Club is still operating at a loss, which is forecast at £77,000 for the current financial year. The Club is also investing approximately £36,000 per annum just on maintaining the existing stadium and facilities. Additionally, the current facilities and grass pitch significantly limit opportunities for the wider teams within the Welling FC umbrella to play and train on-site; as a result, the numerous Academy, youth teams and other teams in the club are dispersed, and must rely on other pitches in the wider area.

- 8.7 The Academy are currently in the early stages of investigating a potential relocation to 176 Footscray Road SE9 2TF, the site of Eltham Town Football Club. This would enable the Academy to be more consolidated and avoid dispersion of their many teams; however, it is anticipated that the development of this site would not provide sufficient capacity for the entirety of the Academy, and therefore that some additional capacity will be required elsewhere, off-site.
- 8.8 There is therefore an acute need for the site to be rejuvenated to enable the club to grow and maintain itself, which must be delivered through redevelopment of the site, due to financial circumstances. The proposed development will deliver new high-quality facilities, ensuring the long-term viability of Welling United FC.
- 8.9 Both LBB and the GLA have been supportive of the principle of redeveloping and enhancing WUFC's facilities at the site. In addition, relevant sports stakeholders, notably including Sport England, the London FA, Kent FA and Football Foundation, have been highly supportive of the proposed development (see Appendix 4 for stakeholder responses).
- 8.10 It is also important to note that the proposals have been located on previously developed land. The existing site is comprised of hardstanding along its borders, with the northern border being particularly extensive (where the proposed building will be primarily located, along Park View Road). Additionally, the existing site houses the existing WUFC two-storey stand and clubhouse along its western boundary; the proposed WUFC club facilities are proposed to be relocated in this area, and within a two-storey building extending beyond the West Wing. As such, the proposals will not be built on greenfield, and have been carefully positioned to minimise impacts.
- 8.11 For the reasons set out in the remainder of this Planning Statement and its appendices, the redevelopment of the site proposed under this application will deliver significant benefits and is considered to comprise sustainable development. Additionally, it is considered that a Very Special Circumstances case exists for the proposals, and that the development will not harm the criteria or purposes of the Green Belt and MOL, in line with the NPPF and London Plan.
- 8.12 The proposed development will give rise to substantial planning benefits that weigh in favour of the application, and which will outweigh any detrimental impacts arising from the proposals. Additionally, it is considered that a robust Very Special Circumstances case underpins the proposed development, and that the proposals also align with and protect the criteria for suitable MOL land.
- 8.13 The technical reports and assessments that support the planning application demonstrate that no significant adverse effects are predicted to arise from the development, whilst also identifying the particular benefits of the scheme.

- 8.14 The proposed development is considered to comprise sustainable development. As such, we consider the proposals are in material conformity with planning policy in the NPPF, the adopted London and LBB's adopted Development Plan.

Appendix 1
Very Special Circumstances Case

Proposed WUFC Redevelopment

Overall VSC (Benefits, Harm & Net Position)

Introduction

The below tables summarise the main 'Benefits' and 'Harm' resulting from the Proposed Development. The third table, 'Net Position', considers the overall conclusion when the harm is deducted from the benefits. It should be noted that these tables also explain how much weight should be applied to the subject matter in the planning balance.

Legend

Levels of harm:	
Key: (Weight applied)	<div style="display: flex; align-items: center; gap: 10px;"> <div style="width: 20px; height: 20px; background-color: red; margin-right: 5px;"></div> = Substantial <div style="width: 20px; height: 20px; background-color: orange; margin-right: 5px;"></div> = Moderate <div style="width: 20px; height: 20px; background-color: yellow; margin-right: 5px;"></div> = Low <div style="width: 20px; height: 20px; background-color: white; margin-right: 5px;"></div> = None </div>
	Less than substantial

Levels of benefit:	
Key: (Weight applied)	<div style="display: flex; align-items: center; gap: 10px;"> <div style="width: 20px; height: 20px; background-color: green; margin-right: 5px;"></div> = Substantial <div style="width: 20px; height: 20px; background-color: lightgreen; margin-right: 5px;"></div> = Moderate <div style="width: 20px; height: 20px; background-color: cyan; margin-right: 5px;"></div> = Low </div>

The tables can be found overleaf.

Net Position

Subject Matter	Identified Impact	Supporting Commentary
High-quality new facilities for Welling United FC	Substantial Benefit	<p>The current Welling FC ("WUFC") facilities are both insufficient and in a poor state of repair, with the club incapable of upgrading their facilities due to financial difficulties.</p> <p>The proposals will provide new high-quality facilities for the club, including the following:</p> <ul style="list-style-type: none"> • Club offices; • Club bar; • Club shop/ticket office; • Home & away changing rooms; • Male & female official changing rooms; • Club kitchen; • Hospitality rooms / VIP rooms / classrooms (flexible use rooms); • Food stall; • First aid room; • Physiotherapy room; • 3 x public toilets (men & women); • Equipment storage • Cycle parking; and • Club refuse & plant rooms. <p>A 3G Astro turf pitch will replace the current grass pitch, thereby ensuring that a high-quality playing surface is provided all year round for Welling FC, Academy Teams and local schools to use, and enabling intensified use. A total of 57 hours of use per week are anticipated, well in excess of what could be provided on a grass pitch (see accompanying WUFC VSC Assessment for further information).</p> <p>The facilities will be primarily for the use of WUFC; WUFC has a professional team, 3 non-academy/professional teams (Senior; Women's; Deaf/Disability), 1,300 participants in the Welling Academy and Scholarships (26 teams)</p>
Long-term sustainability of the club.	Substantial Benefit	<p>Welling United FC are a key local institution, having been founded in 1963 and calling the Park View Road stadium its home since 1977. They have a strong local supporter base, and are regularly involved in local community initiatives and charitable partnerships.</p> <p>These facilities will ensure that Welling FC can operate more efficiently and sustainably, thereby ensuring the long-term viability of a key community asset.</p> <p>The club has historically run at an operating loss, and consistently relied upon owner donations each season to survive financially and continue to function. The owner's forecast contribution for the current year is £460,000. Despite this, the Club is still operating at a loss, which is forecast at £77,000 for the current financial year. The Club is also investing approximately £36,000 per annum just on maintaining the existing stadium and facilities.</p> <p>The new facilities will be of a high-quality and in a good state of repair, thereby avoiding the need for the club to invest significant monies to maintain them. The new 3G pitch and multi-functional facilities will also allow opportunities for the club to lease the space to interested parties, and generate additional income. Further short- and long-term employment opportunities will also be generated. Please see the accompanying WUFC VSC Assessment for further information.</p> <p>Initial financial forecasting has been undertaken by the club with the redevelopment in place, which shows the new facilities will enable the club to be sustainable and not be reliant on owner donations to maintain itself financially. The long-term financial sustainability of the club is demonstrated in the accompanying Financial Viability Assessment.</p>
Enhanced community offer for locals	Substantial Benefit	<p>The aspiration is for the new facilities to serve as a community hub as opposed to just a stadium and pitch.</p> <p>The following community initiatives are targeted as part of Welling FC's potential expanded offer:</p> <ul style="list-style-type: none"> • Use for local schools to be arranged, free-of-charge, during working hours. School cup finals and other annual tournaments can take place at the site. • Holiday activities organised by the Football in the Community team will ensure children and teenagers are positively occupied outside of term time. Football camps, Girls development initiatives, summer camps and wider events will be possible on the new 3G astro turf pitch. • Greater possibility of hosting community events, and extended hours where this can be facilitated. Opportunities for larger-scale events with local/national organisations. • New Astro pitch and function rooms to be integrated into the wider community engagement programme, given it can be used more frequently/extensively. • New walking football and wheelchair football initiatives to come forward. Increase in community through the delivery of new homes. • Pitch hire to opportunities to increase significantly, providing money to sustain the football club financially. <p>The enhanced community offer is considered to generate a significant benefit for the local community, and further engrain the club into the locality.</p> <p>Exact details of community usage, along with securing the space for community use, will be secured via legal agreement tied to the planning permission.</p>
Improved stadium stands for Welling United FC	Substantial Benefit	<p>The proposals will essentially reprovide the existing stand capacity at the Park View Road Stadium (circa 4,000); however, the stands will be of a much higher quality than the existing, which are showing signs of wear.</p> <p>The capacity of seating will be increased to provide a more balanced offer for spectators (from 1,000 to circa 1,400).</p> <p>Standing/seating will be provided on all four sides of the stadium, to enhance the matchday atmosphere.</p> <p>Disabled areas, providing space for 30 spectators, will be provided on the northern stand; the seating will be built to standard and will be easily accessible to/from turnstile entrances, as well as the club shop and bar, and with level access. As such, the new stadium stands will provide significantly improved opportunities for mobility-impaired individuals to attend games.</p> <p>Furthermore, the proposals can demonstrably result in an increased capacity to 5,000 spectators if necessary, in line with National League requirements.</p> <p>The improvements to stadium stands will enable Welling FC to further expand and generate revenue that ensures the long-term viability of the football club. It will also ensure the club is able to move up to the National League and consequently grow, both as an entity and a local institution.</p>

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Delivery of homes & family units	Substantial Benefit	<p>Central Government guidance make it clear that there is a need to deliver more homes, particularly in urban areas like London. The London Plan highlights the mismatch between the need for homes and the annual supply shortfall.</p> <p>The latest results of the Housing Delivery Test (January 2022) demonstrate that LB Bexley have not met their housing targets over the previous 3-year period, achieving 93% of their target.</p> <p>The Proposed Development will provide 104 new homes to help meet the Council's identified housing delivery targets, and therefore constitute a significant benefit.</p> <p>Furthermore, 19 three-bed units (18.3% of total provision) will be delivered as part of the proposed development; additionally, 41 two-bed, four-person units (39.4% of total provision) will also be provided, which can be used as family units. There is therefore a sizeable element of family housing provided as part of the scheme, which will help meet Bexley's identified need for this unit type.</p>
Economic benefits , and temporary construction and permanent jobs	Substantial Benefit	<p>The Proposed Development will result in construction jobs and permanent FTE jobs on the Site in relation to its long-term use and grounds management / maintenance.</p> <p>The Proposed Development will also deliver apprenticeships and training opportunities for the local population. A provision is expected to be secured in the S106 Agreement to ensure that these opportunities are guaranteed.</p> <p>Please see the accompanying Socio-Economic Benefits infographic, included in Appendix 5 of the Planning Statement, for further information on economic benefits and job creation.</p>
Enhanced commercial offer for businesses and locals	Moderate Benefit	<p>The proposals will reprovide 248sqm of commercial floorspace, in two high-quality commercial units along Park View Road, providing active frontage and a significant improvement on the existing arrangements.</p> <p>The proposed units are considered to be a benefit for the site and locality, and will be conducive to new businesses and opportunities to serve the local population.</p>
Architectural Quality	Moderate Benefit	<p>The proposed development will introduce buildings of high architectural and civic quality into the townscape in this part of Bexley, through the use of appropriate materials, massing and detailing; of particular importance is the 'mansion house' typology, which is considered appropriate for the surrounding context and will result in an improvement to the area.</p> <p>Improvements to the public realm along Park View Road and Roseacre Road will also result from the proposed development. The Park View Road footpath will be widened by circa 2m (from 3m to 5m, with varying widths), and extensive active frontage will be provided along the building's frontage, as well as at the corner of Roseacre Road and Park View Road.</p> <p>Additionally, extensive design work has been undertaken to ensure that all new development is located on previously developed land.</p> <p>The proposed development will also result in the removal of visually unappealing buildings on the site, and will therefore result in a betterment of the existing situation.</p> <p>On this basis, the proposals are considered to represent a betterment and benefit over the existing situation. Please see the accompanying Design and Access Statement for further information.</p>
Urban Green Factor	Moderate Benefit	<p>Despite the significant space constraints underpinning the site, and the need to deliver a new pitch and stands, the proposals have been designed to maximise urban greening factor. Including the 3G football pitch, a UGF score of 0.136 is achieved against the 0.4 London Plan objective; however, if the 3G pitch were to be excluded, the UGF score would significantly increase to 0.328.</p> <p>Whilst this still falls short of the target score of 0.4 for predominately residential development, this is considered to be a high figure for the proposed development, and it is considered that the proposed development has been maximised with respect to urban greening. This is also considered to represent a benefit generated by the proposed development.</p>
Energy & Sustainability	Moderate Benefit	<p>An Energy and Sustainability Strategy, prepared by Mendick Waring Ltd, has been submitted in support of this application. The Strategy outlines that the proposals have followed a best-practice approach, based on the Mayor's Energy Hierarchy of 'Be Lean, Be Clean, Be Green'.</p> <p>A fabric first approach will be followed, incorporating passive design measures such as low u-values, low air leakage and low thermal bridging. Active design measures have then incorporated via energy efficient building services, such as 100% low energy lighting, and mechanical ventilation with heat recovery (MVHR).</p> <p>The SAP/SBEM methodology has been used to calculate the energy consumption and resultant CO2 emissions for the proposed development. From this assessment, the Strategy confirms the following:</p> <ul style="list-style-type: none"> By incorporating a combination of all the feasible passive measures and high efficiency services, along with the use of PV Panels, the CO2 emissions of the residential units have been reduced by 71%; and By incorporating a combination of all the feasible passive measures along with the use of efficient individual split VRV, the shell & core commercial spaces have achieved a CO2 reduction of 37% over Part L of Building Regulations. <p>On this basis, by incorporating a combination of all the feasible passive measures along with the use of the above efficient heating & hot water systems and PV Panels, the sitewide CO2 emissions of the development have been reduced by 62% (in excess of the 35% policy requirement).</p> <p>A Carbon Offset contribution will be delivered to achieve zero carbon, in line with London Plan policy.</p> <p>Additionally, Circular Economy and Whole Life Carbon Assessments have been undertaken, demonstrating a commitment to the highest levels of sustainability for the proposed development.</p>
S106 Obligations & CIL contributions	Moderate Benefit	<p>In addition to the benefits generated directly by the proposed development, any identified site-specific needs will be offset through the use of S106 contributions; this can cover a variety of matters, including highways, energy/sustainability, biodiversity, employment, and infrastructure.</p> <p>The proposed development will also result in CIL contributions, both at a local level (Bexley CIL) and London level (MCIL2). £994,504 of local CIL contributions will be generated, as well as £355,398 in Mayoral CIL 2, for a total CIL contribution of £1,349,902. These contributions will help deliver infrastructure improvements, as identified by the respective authorities.</p>
Highway Network & Accessibility	Moderate Benefit	<p>The proposed development will deliver improvements to the existing highway and pavement arrangements.</p> <p>The existing footway along Park View Road, north of the stadium, will be widened by 2m to suitably accommodate existing and future matchday visitors, thereby providing a more inviting atmosphere. Additionally, the existing pedestrian refuge will be relocated to the west of Park View Road to enable the provision of a dedicated servicing bay, thereby improving the delivery and servicing arrangements for the site, and ensuring there are no conflicts with the use of the highway, nor congestion.</p> <p>The existing bus stop will also be retained and will not be reduced in size, thereby enabling the same quantum of buses to operate within this improved environment.</p> <p>The existing cycle path along Park View Road will also be retained.</p> <p>Suitable swept path assessments have been undertaken to demonstrate that the proposed arrangements will function, and will not harm surrounding uses.</p>

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Improved disabled access	Moderate Benefit	In addition to the expected level of disabled access and adaptable/accessible residential units delivered for the residential element of the scheme, the proposed development will also significantly improve disabled access to/from the stadium and across the site, thereby ensuring equal opportunity for all.
Reuse of the of the Erith and Belvedere FC building and eastern stand	Moderate Benefit	Reuse of the existing Erith and Belvedere building and the eastern stand will help to reduce the use of materials in accordance with the principles of the circular economy. Further details to be included within the Circular Economy Statement to be prepared and submitted with the application.
Floodlighting	Low Benefit	The proposals include the replacement of the existing floodlighting with new LED lighting fixtures. A Lighting Assessment has been submitted in support of this planning application, which assesses existing and proposed light levels and spillover. The Assessment confirms that the replacement LED installation will result in a general and pronounced reduction in lux levels and light spillover over the existing situation. For example, the highest existing level on the Southern tree boundary is 243Lux at 2m, whilst the highest vertical level at the same height for the proposals is 65Lux. The Assessment also confirms the proposed lighting strategy does not have any detrimental impacts on the adjoining cricket club. On this basis, it is therefore considered that the replacement lighting proposals represent a benefit, and will have a positive impact on residents.
Active Travel Assessment & Public Realm Improvements	Low Benefit	An Active Travel Zone Assessment, prepared by Motion, has been submitted as part of this planning application. The Assessment determines the level of accessibility of the site with regard to active travel opportunities, and in line with Transport for London (TfL) guidance. The Assessment determines that the area surrounding the site is a good location to follow the healthy streets approach due to its proximity to amenities and public transport links with regular services. However, the Assessment identifies four points which can be improved to fulfil the Healthy Street criteria, as follows: <ul style="list-style-type: none"> • Point 1 – The crossing on Roseacre Road, Route 1 may be improved with the presence of tactile paving; • Point 2 – The Crossing on Bellgrove Road, Route 2 may be improved by re-painting the crossing markings, which makes people safer and crossing easier; • Point 3 – The Cycle Lane on Park View Road, Route 3 may be improved by re-painting the cycle lane markings, which makes pedestrians and cyclists safer; and • Point 4 – The lack of crossing at Foster’s Primary School, Route 4 may be improved by introducing a new crossing area in addition to the ‘Keep Clear’ road markings. The proposed improvements can be secured via legal agreement tied to the planning permission; on this basis, the proposed development is considered to provide low benefit through adherence to the Healthy Streets Approach.
Flood Risk and Drainage	Low Benefit	The proposals include a drainage strategy comprising an attenuation tank of approximately 550m3 at the northern end of the site, along with green/blue roofs. Through the use of this strategy, however, surface water runoff will be limited to 2 l/s for a 100-year + 40% rainfall event. This is considered to be an improvement over the existing site, and therefore a benefit to the scheme.
Impacts to Danson Park SINC & Biodiversity Net Gain	Low Benefit	Danson Park is designated as a Site of Importance for Nature Conservation. A Phase 1 Habitat Survey and Bat Survey Report have been submitted as part of this application, which confirm that no protected species were identified at the site; as such, the proposals are not anticipated to impact upon any protected species. A Biodiversity Net Gain Assessment Report, prepared by AEWC, has been submitted in support of this application. The Assessment confirms that the proposals result in a loss of 33.12% for habitats, and that the trading rules cannot be satisfied as deciduous woodland is being lost from the site and not replaced. However, it is important to note that a significant proportion of the habitat loss is due to the replacement of the existing grass pitch with an artificial 3G pitch, which is a requirement for WUFC. Should the pitch be retained as a grass pitch, as opposed to a 3G artificial pitch, the proposals would result in a 39.12% increase in biodiversity, significantly in excess of the 10% requirement. The existing grass pitch, whilst having a positive impact in terms of the DEFRA Statutory Biodiversity Metric, is not considered to have any actual biodiversity value. The pitch is regularly maintained and used as a playing surface, which significantly limits any actual biodiversity/species being capable of using it. As such, the proposed development is therefore considered to have a limited impact on biodiversity in reality, and actually results in an improvement if the existing grass pitch was not considered a valuable habitat on the DEFRA Statutory Biodiversity Metric. Additionally, whilst the proposed lighting cannot be biodiversity and bat friendly or designed in accordance with the Institute of Lighting Professionals (‘ILP’) Guidance note 8: ‘Bats and Artificial lighting in the UK’, as FA requirements are in conflict with this, the proposed lighting strategy will result in a betterment over the existing lighting. The relevant Bat Conservation Trust ILP Guidance states that ‘the key in the first instance is to maintain or reduce existing light levels, and reduce blue content to protect the bat species present’, and relevant guidance therefore supports this position. Additionally, appropriate temperatures can be used to further limit impacts on bats. As such, the proposals are therefore considered to be acceptable in terms of biodiversity, and will result in a noteworthy biodiversity net gain for the site in actuality.
MOL impacts & openness	Low Harm	Whilst the proposals are within Metropolitan Open Land, it is important to note that the proposals have been located on previously developed land. The existing site is comprised of hardstanding along its borders, with the northern border being particularly extensive (where the proposed building will be primarily located, along Park View Road). Additionally, the existing site houses the existing WUFC two-storey stand and clubhouse along its western boundary; the proposed WUFC club facilities are proposed to be relocated in this area, and within a two-storey building extending beyond the West Wing. As such, the proposals will not be built on greenfield, and have been carefully positioned to minimise impacts. A Townscape and Visual Impact Assessment (‘TVIA’) has been carried out. The TVIA assesses the potential landscape and visual effects of the proposed development on the surrounding landscape and visual receptors. The TVIA undertakes an assessment of MOL impacts and confirms the following: <ul style="list-style-type: none"> • There will be a localised decline in visual openness due to the proposed residential building; however, the decline would be limited to a small area of the wider Danson Park MOL given the extensive tree cover to the south of the site, which screens this part of the MOL;

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		<ul style="list-style-type: none"> There will be a negligible decline against criteria 1 of the MOL (as per Policy G3) – whilst the proposed development would increase the amount of built form at the site, the existing facilities already exert an influence on the Danson Park MOL, and the proposed development would negligibly increase this effect. <p>The TVIA also confirms that the proposals do not harm any of the other intended purposes of the MOL, and it is also considered that the proposed development will not conflict with the purposes of the Green Belt, as set out in the NPPF.</p>
Car Parking & Transport Impacts	No Harm/Low Harm	<p>The proposals are a car-free development and will deliver a total of 8 disabled car parking spaces. Two car club bays will be provided, which will be funded for a two-year period, along with discounted membership for existing residents in the surrounding area, and membership for residents of the proposed development.</p> <p>On-street parking stress surveys and matchday surveys have been carried out as discussed/agreed with LBB officers during pre-application discussions. The parking stress survey demonstrates there is suitable capacity on surrounding roads to accommodate anticipated residential parking demand, and the matchday surveys revealed that taking the bus to and from evening games and walking to and from daytime games are most common.</p> <p>Residential and Stadium Travel Plans have been submitted as part of the pre-application to ensure that sustainable transport methods are promoted and reliance on the car is reduced.</p> <p>Additionally, an Event Management Plan has been developed and submitted as part of this planning application to mitigate and manage impacts related to events at the ground which may result in transport constraints due to attendance.</p> <p>Finally, a Delivery and Servicing Plan has also been included in support of this application, which sets out detail in respect of deliveries and servicing for the proposed development, and appropriate measures to avoid potential concerns.</p> <p>A Construction Traffic Management Plan has also been submitted, and will ensure that construction traffic impacts are suitably managed and mitigated.</p> <p>From the package of information and measures submitted, it is considered that the harm will be suitably managed and mitigated, and that there is no-to-low harm.</p>
Daylight & Sunlight	No Harm/Low Harm	<p>A Daylight and Sunlight Assessment, prepared by T16 Design, has been submitted in support of this application. With regard to impacts to neighbouring residents/properties, the Assessment considers that, in the context of an urban site, daylight impacts are acceptable and in line with the aims of the BRE guidance, and in excess of GLA targets. In terms of sunlight impacts, the Assessment also confirms that of the assessed windows retain 25% of available sunlight hours annually and 5% over the winter months, in line with BRE guidance, and the scheme is therefore compliant with BRE guidance in relation to sunlight impacts.</p> <p>The Assessment also includes an assessment of internal daylight within the proposed development, using the Target Daylight Factor method, and assesses units on the lowest floor, on the basis that higher ones will be at least as well-lit, in line with BRE guidance. The Assessment confirms that, from the results, all assessed habitable rooms meet and exceed the minimum levels of internal daylight.</p> <p>Additionally, no harm is anticipated to the adjoining Bexleyheath Cricket Club pitch.</p> <p>On this basis, no-to-low harm arises from the proposed development, given daylight impacts to neighbouring properties are considered justified in the context of an urban site.</p>
Loss of Trees	No Harm/Low Harm	<p>A Tree Survey and Arboricultural Impact Assessment, prepared by Brindle and Green, has been submitted in support of this planning application.</p> <p>The report confirms that trees T2, T3, G4 and G5 are recommended for removal due to conflict with the proposed development. With the exception of the Category B group G5, all trees to be removed are Category C and of limited value and quality. These trees are all located on the western boundary of the site, at the intersection of the site with the Roseacre Road houses.</p> <p>The report also confirms that the proposed development will have a minimal impact on the Category A group of trees W1, forming the southern boundary of the site. As such, the report concludes that the proposals will retain a harmonious relationship with the woodland, and retain this vital visual screening for the development to/from Danson Park.</p> <p>The report also considers that the proposed landscaping strategy has maximised new planting to help offset the necessary removal, despite the spatial constraints of the site.</p> <p>On this basis, it is therefore considered that the proposals have mitigated the harm arising from the loss of trees.</p>

Benefits	Subject Matter	Identified Impact	Supporting Commentary
	High-quality new facilities for Welling United FC	Substantial Benefit	<p>The current Welling FC ("WUFC") facilities are both insufficient and in a poor state of repair, with the club incapable of upgrading their facilities due to financial difficulties.</p> <p>The proposals will provide new high-quality facilities for the club, including the following:</p> <ul style="list-style-type: none"> • Club offices; • Club bar; • Club shop/ticket office; • Home & away changing rooms; • Male & female official changing rooms; • Club kitchen; • Hospitality rooms / VIP rooms / classrooms (flexible use rooms); • Food stall; • First aid room; • Physiotherapy room; • 3 x public toilets (men & women); • Equipment storage • Cycle parking; and • Club refuse & plant rooms. <p>A 3G Astro turf pitch will replace the current grass pitch, thereby ensuring that a high-quality playing surface is provided all year round for Welling FC, Academy Teams and local schools to use, and enabling intensified use. A total of 57 hours of use per week are anticipated, well in excess of what could be provided on a grass pitch (see accompanying WUFC VSC Assessment for further information).</p> <p>The facilities will be primarily for the use of WUFC; WUFC has a professional team, 3 non-academy/professional teams (Senior; Women's; Deaf/Disability), 1,300 participants in the Welling Academy and Scholarships (26 teams)</p>
	Long-term sustainability of the club.	Substantial Benefit	<p>Welling United FC are a key local institution, having been founded in 1963 and calling the Park View Road stadium its home since 1977. They have a strong local supporter base, and are regularly involved in local community initiatives and charitable partnerships.</p> <p>These facilities will ensure that Welling FC can operate more efficiently and sustainably, thereby ensuring the long-term viability of a key community asset.</p> <p>The club has historically run at an operating loss, and consistently relied upon owner donations each season to survive financially and continue to function. The owner's forecast contribution for the current year is £460,000. Despite this, the Club is still operating at a loss, which is forecast at £77,000 for the current financial year. The Club is also investing approximately £36,000 per annum just on maintaining the existing stadium and facilities.</p> <p>The new facilities will be of a high-quality and in a good state of repair, thereby avoiding the need for the club to invest significant monies to maintain them. The new 3G pitch and multi-functional facilities will also allow opportunities for the club to lease the space to interested parties, and generate additional income. Further short- and long-term employment opportunities will also be generated. Please see the accompanying WUFC VSC Assessment for further information.</p> <p>Initial financial forecasting has been undertaken by the club with the redevelopment in place, which shows the new facilities will enable the club to be sustainable and not be reliant on owner donations to maintain itself financially. The long-term financial sustainability of the club is demonstrated in the accompanying Financial Viability Assessment.</p>
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Energy & Sustainability	Moderate Benefit	<p>An Energy and Sustainability Strategy, prepared by Mendick Waring Ltd, has been submitted in support of this application. The Strategy outlines that the proposals have followed a best-practice approach, based on the Mayor's Energy Hierarchy of 'Be Lean, Be Clean, Be Green'.</p> <p>A fabric first approach will be followed, incorporating passive design measures such as low u-values, low air leakage and low thermal bridging. Active design measures have then incorporated via energy efficient building services, such as 100% low energy lighting, and mechanical ventilation with heat recovery (MVHR).</p> <p>The SAP/SBEM methodology has been used to calculate the energy consumption and resultant CO2 emissions for the proposed development. From this assessment, the Strategy confirms the following:</p> <ul style="list-style-type: none"> By incorporating a combination of all the feasible passive measures and high efficiency services, along with the use of PV Panels, the CO2 emissions of the residential units have been reduced by 71%; and By incorporating a combination of all the feasible passive measures along with the use of efficient individual split VRV, the shell & core commercial spaces have achieved a CO2 reduction of 37% over Part L of Building Regulations. <p>On this basis, by incorporating a combination of all the feasible passive measures along with the use of the above efficient heating & hot water systems and PV Panels, the sitewide CO2 emissions of the development have been reduced by 62% (in excess of the 35% policy requirement).</p> <p>A Carbon Offset contribution will be delivered to achieve zero carbon, in line with London Plan policy.</p> <p>Additionally, Circular Economy and Whole Life Carbon Assessments have been undertaken, demonstrating a commitment to the highest levels of sustainability for the proposed development.</p>
S106 Obligations & CIL contributions	Moderate Benefit	<p>In addition to the benefits generated directly by the proposed development, any identified site-specific needs will be offset through the use of S106 contributions; this can cover a variety of matters, including highways, energy/sustainability, biodiversity, employment, and infrastructure.</p> <p>The proposed development will also result in CIL contributions, both at a local level (Bexley CIL) and London level (MCIL2). £994,504 of local CIL contributions will be generated, as well as £355,398 in Mayoral CIL 2, for a total CIL contribution of £1,349,902. These contributions will help deliver infrastructure improvements, as identified by the respective authorities.</p>
Highway Network & Accessibility	Moderate Benefit	<p>The proposed development will deliver improvements to the existing highway and pavement arrangements.</p> <p>The existing footway along Park View Road, north of the stadium, will be widened by 2m to suitably accommodate existing and future matchday visitors, thereby providing a more inviting atmosphere. Additionally, the existing pedestrian refuge will be relocated to the west of Park View Road to enable the provision of a dedicated servicing bay, thereby improving the delivery and servicing arrangements for the site, and ensuring there are no conflicts with the use of the highway, nor congestion.</p> <p>The existing bus stop will also be retained and will not be reduced in size, thereby enabling the same quantum of buses to operate within this improved environment.</p> <p>The existing cycle path along Park View Road will also be retained.</p> <p>Suitable swept path assessments have been undertaken to demonstrate that the proposed arrangements will function, and will not harm surrounding uses.</p>

Subject Matter	Identified Impact	Supporting Commentary
Improved disabled access	Moderate Benefit	In addition to the expected level of disabled access and adaptable/accessible residential units delivered for the residential element of the scheme, the proposed development will also significantly improve disabled access to/from the stadium and across the site, thereby ensuring equal opportunity for all.
Reuse of the of the Erith and Belvedere FC building and eastern stand	Moderate Benefit	Reuse of the existing Erith and Belvedere building and the eastern stand will help to reduce the use of materials in accordance with the principles of the circular economy. Further details to be included within the Circular Economy Statement to be prepared and submitted with the application.
Floodlighting	Low Benefit	The proposals include the replacement of the existing floodlighting with new LED lighting fixtures. A Lighting Assessment has been submitted in support of this planning application, which assesses existing and proposed light levels and spillover. The Assessment confirms that the replacement LED installation will result in a general and pronounced reduction in lux levels and light spillover over the existing situation. For example, the highest existing level on the Southern tree boundary is 243Lux at 2m, whilst the highest vertical level at the same height for the proposals is 65Lux. The Assessment also confirms the proposed lighting strategy does not have any detrimental impacts on the adjoining cricket club. On this basis, it is therefore considered that the replacement lighting proposals represent a benefit, and will have a positive impact on residents.
Active Travel Assessment & Public Realm Improvements	Low Benefit	An Active Travel Zone Assessment, prepared by Motion, has been submitted as part of this planning application. The Assessment determines the level of accessibility of the site with regard to active travel opportunities, and in line with Transport for London (TfL) guidance. The Assessment determines that the area surrounding the site is a good location to follow the healthy streets approach due to its proximity to amenities and public transport links with regular services. However, the Assessment identifies four points which can be improved to fulfil the Healthy Street criteria, as follows: <ul style="list-style-type: none"> • Point 1 – The crossing on Roseacre Road, Route 1 may be improved with the presence of tactile paving; • Point 2 – The Crossing on Bellgrove Road, Route 2 may be improved by re-painting the crossing markings, which makes people safer and crossing easier; • Point 3 – The Cycle Lane on Park View Road, Route 3 may be improved by re-painting the cycle lane markings, which makes pedestrians and cyclists safer; and • Point 4 – The lack of crossing at Foster's Primary School, Route 4 may be improved by introducing a new crossing area in addition to the 'Keep Clear' road markings. The proposed improvements can be secured via legal agreement tied to the planning permission; on this basis, the proposed development is considered to provide low benefit through adherence to the Healthy Streets Approach.
Flood Risk and Drainage	Low Benefit	The proposals include a drainage strategy comprising an attenuation tank of approximately 550m ³ at the northern end of the site, along with green/blue roofs. Through the use of this strategy, however, surface water runoff will be limited to 2 l/s for a 100-year + 40% rainfall event. This is considered to be an improvement over the existing site, and therefore a benefit to the scheme.
Impacts to Danson Park SINC & Biodiversity Net Gain	Low Benefit	Danson Park is designated as a Site of Importance for Nature Conservation. A Phase 1 Habitat Survey and Bat Survey Report have been submitted as part of this application, which confirm that no protected species were identified at the site; as such, the proposals are not anticipated to impact upon any protected species. A Biodiversity Net Gain Assessment Report, prepared by AEWG, has been submitted in support of this application. The Assessment confirms that the proposals result in a loss of 33.12% for habitats, and that the trading rules cannot be satisfied as deciduous woodland is being lost from the site and not replaced. However, it is important to note that a significant proportion of the habitat loss is due to the replacement of the existing grass pitch with an artificial 3G pitch, which is a requirement for WUFC. Should the pitch be retained as a grass pitch, as opposed to a 3G artificial pitch, the proposals would result in a 39.12% increase in biodiversity, significantly in excess of the 10% requirement. The existing grass pitch, whilst having a positive impact in terms of the DEFRA Statutory Biodiversity Metric, is not considered to have any actual biodiversity value. The pitch is regularly maintained and used as a playing surface, which significantly limits any actual biodiversity/species being capable of using it. As such, the proposed development is therefore considered to have a limited impact on biodiversity in reality, and actually results in an improvement if the existing grass pitch was not considered a valuable habitat on the DEFRA Statutory Biodiversity Metric. Additionally, whilst the proposed lighting cannot be biodiversity and bat friendly or designed in accordance with the Institute of Lighting Professionals ('ILP') Guidance note 8: 'Bats and Artificial lighting in the UK', as FA requirements are in conflict with this, the proposed lighting strategy will result in a betterment over the existing lighting. The relevant Bat Conservation Trust ILP Guidance states that 'the key in the first instance is to maintain or reduce existing light levels, and reduce blue content to protect the bat species present', and relevant guidance therefore supports this position. Additionally, appropriate temperatures can be used to further limit impacts on bats. As such, the proposals are therefore considered to be acceptable in terms of biodiversity, and will result in a noteworthy biodiversity net gain for the site in actuality.

Potential Harms	Subject Matter	Identified Impact	Supporting Commentary
	MOL impacts & openness	Low Harm	<p>Whilst the proposals are within Metropolitan Open Land, it is important to note that the proposals have been located on previously developed land. The existing site is comprised of hardstanding along its borders, with the northern border being particularly extensive (where the proposed building will be primarily located, along Park View Road). Additionally, the existing site houses the existing WUFC two-storey stand and clubhouse along its western boundary; the proposed WUFC club facilities are proposed to be relocated in this area, and within a two-storey building extending beyond the West Wing. As such, the proposals will not be built on greenfield, and have been carefully positioned to minimise impacts.</p> <p>A Townscape and Visual Impact Assessment ('TVIA') has been carried out. The TVIA assesses the potential landscape and visual effects of the proposed development on the surrounding landscape and visual receptors. The TVIA undertakes an assessment of MOL impacts and confirms the following:</p> <ul style="list-style-type: none"> There will be a localised decline in visual openness due to the proposed residential building; however, the decline would be limited to a small area of the wider Danson Park MOL given the extensive tree cover to the south of the site, which screens this part of the MOL; There will be a negligible decline against criteria 1 of the MOL (as per Policy G3) – whilst the proposed development would increase the amount of built form at the site, the existing facilities already exert an influence on the Danson Park MOL, and the proposed development would negligibly increase this effect. <p>The TVIA also confirms that the proposals do not harm any of the other intended purposes of the MOL, and it is also considered that the proposed development will not conflict with the purposes of the Green Belt, as set out in the NPPF.</p>
	Car Parking & Transport Impacts	No Harm/Low Harm	<p>The proposals are a car-free development and will deliver a total of 8 disabled car parking spaces. Two car club bays will be provided, which will be funded for a two-year period, along with discounted membership for existing residents in the surrounding area, and membership for residents of the proposed development.</p> <p>On-street parking stress surveys and matchday surveys have been carried out as discussed/agreed with LBB officers during pre-application discussions. The parking stress survey demonstrates there is suitable capacity on surrounding roads to accommodate anticipated residential parking demand, and the matchday surveys revealed that taking the bus to and from evening games and walking to and from daytime games are most common.</p> <p>Residential and Stadium Travel Plans have been submitted as part of the pre-application to ensure that sustainable transport methods are promoted and reliance on the car is reduced.</p> <p>Additionally, an Event Management Plan has been developed and submitted as part of this planning application to mitigate and manage impacts related to events at the ground which may result in transport constraints due to attendance.</p> <p>Finally, a Delivery and Servicing Plan has also been included in support of this application, which sets out detail in respect of deliveries and servicing for the proposed development, and appropriate measures to avoid potential concerns.</p> <p>A Construction Traffic Management Plan has also been submitted, and will ensure that construction traffic impacts are suitably managed and mitigated.</p> <p>From the package of information and measures submitted, it is considered that the harm will be suitably managed and mitigated, and that there is no-to-low harm.</p>
	Daylight & Sunlight	No Harm/Low Harm	<p>A Daylight and Sunlight Assessment, prepared by T16 Design, has been submitted in support of this application. With regard to impacts to neighbouring residents/properties, the Assessment considers that, in the context of an urban site, daylight impacts are acceptable and in line with the aims of the BRE guidance, and in excess of GLA targets. In terms of sunlight impacts, the Assessment also confirms that of the assessed windows retain 25% of available sunlight hours annually and 5% over the winter months, in line with BRE guidance, and the scheme is therefore compliant with BRE guidance in relation to sunlight impacts.</p> <p>The Assessment also includes an assessment of internal daylight within the proposed development, using the Target Daylight Factor method, and assesses units on the lowest floor, on the basis that higher ones will be at least as well-lit, in line with BRE guidance. The Assessment confirms that, from the results, all assessed habitable rooms meet and exceed the minimum levels of internal daylight.</p> <p>Additionally, no harm is anticipated to the adjoining Bexleyheath Cricket Club pitch.</p> <p>On this basis, no-to-low harm arises from the proposed development, given daylight impacts to neighbouring properties are considered justified in the context of an urban site.</p>
	Loss of Trees	No Harm/Low Harm	<p>A Tree Survey and Arboricultural Impact Assessment, prepared by Brindle and Green, has been submitted in support of this planning application.</p> <p>The report confirms that trees T2, T3, G4 and G5 are recommended for removal due to conflict with the proposed development. With the exception of the Category B group G5, all trees to be removed are Category C and of limited value and quality. These trees are all located on the western boundary of the site, at the intersection of the site with the Roseacre Road houses.</p> <p>The report also confirms that the proposed development will have a minimal impact on the Category A group of trees W1, forming the southern boundary of the site. As such, the report concludes that the proposals will retain a harmonious relationship with the woodland, and retain this vital visual screening for the development to/from Danson Park.</p> <p>The report also considers that the proposed landscaping strategy has maximised new planting to help offset the necessary removal, despite the spatial constraints of the site.</p> <p>On this basis, it is therefore considered that the proposals have mitigated the harm arising from the loss of trees.</p>
	Air Quality & Dust Impacts	No Harm	<p>The submitted Air Quality Assessment confirms that the proposed development is not expected to result in any impact to the air quality of the local area, nor that future residents will experience unacceptable air quality impacts.</p> <p>Additionally, the scheme is considered to be air quality neutral, both in respect of transport emissions and building emissions.</p> <p>A Construction Management Plan and Site Waste Management Plan have also been submitted, and will ensure that construction impacts are suitably mitigated.</p> <p>On this basis, the air quality impacts of the scheme are considered to be acceptable.</p>
Noise	No Harm	<p>A Noise Assessment, prepared by Hawkins Environmental, has been submitted in support of this planning application. The Assessment confirms that, with the proposed mitigation in place, the proposal will result in internal daytime and internal night-time noise in line with standards.</p>	

	Subject Matter	Identified Impact	Supporting Commentary
			<p>With regard to noise to surrounding uses, the Assessment confirms that no unacceptable impacts will arise provided the recommended mitigation is introduced.</p> <p>The necessary mitigation will be secured via condition and/or legal agreement; therefore, no harm is anticipated from the proposed development with regard to noise.</p>

Proposed WUFC Redevelopment
WUFC VSC Assessment

Comparison Of Existing VS Proposed

	Existing	Proposed	Net Position
Number of senior teams & players	3 non-academy/senior teams: <ul style="list-style-type: none"> • Senior • Women's • Deaf/Disability 	5 teams (including the existing). <u>New teams:</u> <ul style="list-style-type: none"> • Wheelchair football • Walking football 	+2 New teams: <ul style="list-style-type: none"> • Wheelchair football • Walking football +30-40 new players for the above teams.
Youth Players	1,300 participants in the Welling Academy and Scholarship programme A total of 26 teams: <ul style="list-style-type: none"> • Under 6 pre-academy • Under 7 Blues • Under 7 Reds • Under 7 Wings • Under 8 Reds • Under 8 FC • Under 8 Wings • Under 9 Wings • Under 9 Blues • Under 9 Whites • Under 9 Reds • Under 10 Girls • Under 10 Blues • Under 10 Reds • Under 10 Wings • Under 11 FC • Under 11 JPL • Under 12 FC • Under 12 Reds • Under 13 FC • Under 14 FC 	No further players anticipated at this stage, although potential for growth to: <ul style="list-style-type: none"> • over 100 youth teams across all ages and genders in the future; • over 300 students in the Academy 	No further players anticipated at this stage, although proposals offer potential for growth to: <ul style="list-style-type: none"> • over 100 youth teams across all ages and genders in the future; • over 300 students in the Academy

	Existing	Proposed	Net Position
	<ul style="list-style-type: none"> Under 15 FC Under 16 FC Under 16 KYL U18 Bostik GK Training <p>500 youth players Circa 85 students in the Academy</p>		
Community Engagement	<p>Historic partnerships:</p> <ul style="list-style-type: none"> MIND Age UK Chartwell Childrens Cancer Trust McDonalds National League Trust 	<p>New anticipated partnerships:</p> <ul style="list-style-type: none"> LB Bexley Youth Services MAN v FAT Premier League Girls Kick it Out Show Racism the Red Card EFL Trust Frame Football Spirit of Football Weetabix Wildcats <p>Historic partnerships to be retained.</p>	<p>New partnerships (in addition to the existing) due to intensified pitch use:</p> <ul style="list-style-type: none"> LB Bexley Youth Services MAN v FAT Premier League Girls Kick it Out Show Racism the Red Card EFL Trust Frame Football Spirit of Football Weetabix Wildcats
Increased stadium capacity	<p>Capacity of circa 4,000</p> <p>Average attendance of 500-600 spectators per game.</p>	<p>Capacity of 4,044. Potential to increase to 5,000 to meet FA requirements if promotion is secured.</p> <p>Average attendance expected to increase to 1,500 in the future, as results improve.</p>	<p>No change, but improved arrangements and quality of facilities and future-proofing the club if promotion is secured.</p> <p>Potential to increase to 5,000 spaces to meet FA requirements if promotion is secured.</p>
Facilities	<ul style="list-style-type: none"> High-maintenance grass pitch 2 changing rooms (home & away) Officials' changing room Bar (insufficient for serving the amount of spectators attending games) Shower/toilet facilities (from Erith & Belvedere as Welling facilities in very poor state) <p>All in a very poor state of repair, and current condition does not allow for external training/games/charitable initiatives/classroom &</p>	<ul style="list-style-type: none"> Intensive use 3G pitch Replacement changing rooms (home & away) Replacement officials' changing room (male & female) Ticket office Club office Classrooms/ hospitality rooms Bar/café Toilets Equipment stores 	<p>Improved replacement facilities:</p> <ul style="list-style-type: none"> Intensive use 3G pitch (to increase opportunities for training/games etc.) Replacement changing rooms (home & away) Replacement officials' changing <p>New Facilities:</p> <ul style="list-style-type: none"> Ticket office Club office Classrooms/ hospitality rooms Bar/café

	Existing	Proposed	Net Position
	study.	<ul style="list-style-type: none"> • First aid/physio room • Cycle parking <p>All of a high-quality design. There is a clear need for these facilities.</p> <p>Erith & Belvedere changing rooms will be reused and, if necessary, refurbished. These can be used simultaneously with the new changing rooms, for training sessions or for youth/school teams.</p>	<ul style="list-style-type: none"> • Toilets • Equipment stores • First aid/physio room • Cycle parking <p>All of a high-quality design. There is a clear need for these facilities.</p> <p>Erith & Belvedere changing rooms will be reused and, if necessary, refurbished. These can be used simultaneously with the new changing rooms, for training sessions or for youth/school teams.</p>
Yearly Revenue	<p>The club has historically run at an operating loss, and consistently relied upon owner donations each season to survive financially and continue to function.</p> <p>The owner's forecast contribution for the current year is £460,000.</p> <p>Despite this, the Club is still operating at a loss, which is forecast at £77,000 for the current financial year.</p> <p>The Club is also investing approximately £36,000 per annum just on maintaining the existing stadium and facilities.</p> <p>As per cash flow forecast, the club would continue to be financial unsustainable in the long term, with yearly negative net cashflow exceeding £300,000 every year (once owner donations conclude).</p>	<p>Positive net cashflow produced within the first year of operation (without owner donations).</p> <p>Pitch hire sessions from the 3G pitch to increase to £417,600 of revenue generation.</p>	<p>Proposals result in a financially sustainable club, without the need for donations.</p>
Schools & Children	<p>2 current schools being delivered sports and related activities:</p> <ul style="list-style-type: none"> • Days Lane • St Fidelis 	<p>New schools being targeted for programmes promoting healthy eating and lifestyle choices:</p> <ul style="list-style-type: none"> • Crook Log Primary School 	<p>12+ new schools capable of being delivered sports and related activities:</p> <ul style="list-style-type: none"> • Pelham Primary School • Danson Primary School







	Existing	Proposed	Net Position
	<p>Wings Wellness in partnership with 8 schools.</p> <p>Circa 40 school players.</p>	<ul style="list-style-type: none"> • Bright Horizons Day Centre • Foster's Primary School • Barrington Primary School <p>Opportunity for the following schools to play games on-site:</p> <ul style="list-style-type: none"> • Pelham Primary School • Danson Primary School • Bexley Grammar School • Hook Lane Primary School • St Stephen's Catholic Primary School • Foster's Primary School • Aspire Academy Bexley • Crook Log Primary School • Barrington Primary School • Bishop Ridley CE Primary School • Upton Primary School • Sherwood Park Primary School <p>Significant increase in number of school players, to circa 400 players.</p> <p>Opportunities for summer camps during the summer, outside of football season.</p>	<ul style="list-style-type: none"> • Bexley Grammar School • Hook Lane Primary School • St Stephen's Catholic Primary School • Foster's Primary School • Aspire Academy Bexley • Crook Log Primary School • Barrington Primary School • Bishop Ridley CE Primary School • Upton Primary School • Sherwood Park Primary School <p>4 new schools being targeted through Wigns Wellness, for programmes promoting healthy eating and lifestyle choices:</p> <ul style="list-style-type: none"> • Crook Log Primary School • Bright Horizons Day Centre • Foster's Primary School • Barrington Primary School <p>School players increase by circa 360 players.</p> <p>Opportunities for summer camps during the summer, outside of football season.</p>
<p>Reducing stress on existing pitches</p>	<p>Pitches currently used by the Academy and senior teams:</p> <ul style="list-style-type: none"> • Goals Eltham Baldon Sports Ground, Eltham Palace Road • Cleeve Park School, Bexley Lane, Sidcup • Harris Academy School, The Green, Welling • King Henry School, Erith • Long Lane FC, Kidbrooke Playing Fields <p>Seniors:</p> <p><u>Men's Team</u> Tuesday: Tunbridge, Thursday: Long Lane (2h blocks)</p>	<p>Club teams to train and host games on-site (Park View Road), in tandem with the proposed new Academy facilities at 176 Footscray Road SE9 2TF (Eltham Town Football Club).</p> <p>Temporary lines can be painted for various age groups and team sizes.</p>	<p>Reduced stress on the following pitches, enabling their use by other teams:</p> <ul style="list-style-type: none"> • Goals Eltham Baldon Sports Ground, Eltham Palace Road • Cleeve Park School, Bexley Lane, Sidcup • Harris Academy School, The Green, Welling • King Henry School, Erith • Long Lane FC, Kidbrooke Playing Fields <p>Other opportunities for the following schools to play on-site will further reduce stress:</p> <ul style="list-style-type: none"> • Pelham Primary School

	Existing	Proposed	Net Position
	<p><u>Women's Team:</u> Tuesday & Thursdays: Cleave Park</p> <p>Most teams are forced to play/train outside the Borough as the existing facilities are insufficient (see Green Infrastructure Studyⁱ).</p>		<ul style="list-style-type: none"> • Danson Primary School • Bexley Grammar School • Hook Lane Primary School • St Stephen's Catholic Primary School • Foster's Primary School • Aspire Academy Bexley • Crook Log Primary School • Barrington Primary School • Bishop Ridley CE Primary School • Upton Primary School • Sherwood Park Primary School <p>Teams and the wider community (incl. schools) will now train more frequently in the Borough and in close proximity to Welling.</p>

Indicative Pitch Schedule*

Times	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
09:00 - 10:00							
10:00 - 11:00							
11:00 - 12:00							
12:00 - 13:00							
13:00 - 14:00							
14:00 - 15:00							
15:00 - 16:00							
16:00 - 17:00							
17:00 - 18:00							
18:00 - 19:00							
19:00 - 20:00							
20:00 - 21:00							

KEY:

 Men's Team	 Women's Team	 Academy (16-18 Education)	 Youth Teams	 Community Use (Public/Schools)	 No Use
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Use	Hours (per Week)
Welling United – Men's Team	7 hours
Welling United – Women's Team	7 hours
Welling United – Youth Teams	10 hours
Academy (16-18 Education)	12 hours
Community Use (Public/School)	21 hours
TOTAL	57 hours

The new 3G pitch at Welling will not only be used by children in girls and boys football teams from 5-16 following the traditional grass roots pathway, but for children who aren't in teams, community sessions will be run with an open invite to everyone so children at every age can still enjoy being able to play football with their friends.

The national initiatives of Walking Football, Man V Fat and Wildcats will give minority groups of people the chance and the opportunity to play football for their mental health, wellbeing and social interaction, and will be hosted at the ground.

The local community can book monthly football sessions, with subscriptions, and will be able to enjoy playing football after work.

Groups such as Frame Football and Spirit of Football will have a safe and stable environment to enjoy playing football.

During the day, the pitch can be used by local schools when "mud stops play" as so often happens now in our UK winters to protect the school fields. Local inter-school tournaments can be held as well as wider county competitions.

The proposals will therefore really be a hub for the community.

** Pitch schedule represents a typical week during football season (usually around August to April). Opportunities for non-first-team related activities could be increased at certain points during the off-season, when first-team players do not, or sporadically, use the facilities.*

Footnotes:

¹ Bexley's Green Infrastructure Study (April 2020) states that 'in general, no excess in provision has been identified when considering the current and future demand in Bexley'. The study further finds that 'there is a current shortfall of pitches during peak periods, 'most particularly for youth 11v11 football on Sunday mornings and for NLS Step Level football on Saturday afternoons'. This shortfall also grows if unmet and displaced demand is taken into account. The Green Infrastructure concludes that there is insufficient provision to meet future demand, and that there is a need for at least 2 FA-approved full-size 3G FTPs in the borough by 2036.

Appendix 2
Welling FC Club Timeline

Welling United Timeline



Year	Key milestone for football club	Key points
1997	Club enters agreement with Erith and Belvedere for groundshare	<ul style="list-style-type: none">• Groundshare only enabled because club ground requirements were not meeting Vauxhall Conference requirements• New stand on sports ground side funded by groundshare
2003	Welling United organise hard ball court initiative in Welling	<ul style="list-style-type: none">• Aimed at local youths to take part in mid week football sessions in local youth centre to stop anti social behaviour. 200 local youths took part
2004	First ever Community Development Officer works for Welling United	<ul style="list-style-type: none">• Jim Dean recruited as first community officer, as a result• Engagement with 15 primary schools• Attracted over 300 local school children to matches in first season with local penalty competition initiative
2006	Club launches its first ever junior section working with Kingsmoor	<ul style="list-style-type: none">• Created 12 boys and girls teams playing under Welling United name, this attracted over 250 children taking part until disbanded in 2014



Year	Key milestone for football club	Key aims
2007	Welling United showcase at the Danson Festival event hosted in Danson Park 30,000 present over two days	<ul style="list-style-type: none">• Promoting Welling United FC to local community• Deliver a more diverse group of new supporters to the club• Showcase the community scheme
2010	Welling United Football Club have HRMC winding up order served, however incredibly supporters raise £68k to save club and stop winding up order	<ul style="list-style-type: none">• Winding up order driving by challenges in running football club, due to poor facilities• Welling United Supporters Representative appointed to board to ensure transparency with supporters and build closer relationship
2013	Welling United win promotion to National League Premier	<ul style="list-style-type: none">• Great success on the pitch average crowds grew to 900+ per week• Poor Stadium conditions meant club did not meet ground grading requirements, as a result £52k had to be raised to enable club to meet requirements



Year	Key milestone for football club	Key aims
2017	Welling United agree and launch Welling Academy and Scholarship programme and announce new directors Garry Fiore and Brett Smith	<ul style="list-style-type: none"> • Create football for all, boys and girls from 5 upwards • Launch scholarship programme for 16-19 year olds • Now have 1300 participants in all programmes
2018	Welling United Football Club announce charity partnership with MIND to help men talk about mental health issues	<ul style="list-style-type: none"> • MIND at home games during season to help reach out to men and be part of discussion/therapy groups • Raise awareness of mental health issues in young men, reach was over 14,000 people during the season • Charity match organised with celebrity XI vs Welling Utd ex players and supporters, playing in front of 1500 spectators raising over £25k for the charity
2019	Welling United work with Age Concern UK to set up coffee mornings and activities for the elderly held each week in the clubhouse	<ul style="list-style-type: none"> • Brought over 100 local elderly residents using clubhouse facility • Positive mental and physical health experience • Activities held in clubhouse to support afternoons



Year	Key milestone for football club	Key aims
2022	Welling United – Park end terrace condemned and changing rooms in main stand condemned	<ul style="list-style-type: none"> • Substantial repair the stud base of terrace, if not completed by March, club would have failed ground grading and been relegated out of National League. • Relied on donations from WUSA and sponsors • Open again for March 2023 and completed grading
2022	Welling United Business Club formed	<ul style="list-style-type: none"> • Linked up with Discover Welling and Welling Town Partnership with the sole aim to make Welling United the hub of local business and get them interacting with the club • Club now has 40 members and still growing • As part of the business club, will be launching app that will be an online hub for local business and charities, that will also help young teenagers, academy and anyone that lives in Bexley Borough
2022	Welling United Womens Business Club formed	<ul style="list-style-type: none"> • Members of Welling United Business Club decided to form Womens only club • Working with Welling United Womens team to help finance them with the main aim of building parity with the Mens first team • As a result in year 1 the womens business club helped achieve three record crowds for step 6 of Womens football, creating a crowd of 690.



Year	Key milestone for football club	Key aims
2022	Welling United launch charity partnership with Chartwell Childrens Cancer Trust	<ul style="list-style-type: none"> • Launched Charity partnership with objective to raise money to fund a robot called Wingy, this is a robot that can go into school and be the eyes and ears of the sick child and gives them experience of learning with the teacher and fellow pupils. So far raised £5k
2023	Welling United hosted the first ever community event, free to all.	<ul style="list-style-type: none"> • Hosted the mayor and deputy of Bexley as well as local councillors and local MP Louie French • Over 3000 people attended event, making this the biggest attended event in Bexley for the Kings Coronation celebrations • Due to success this will now be an annual event
2023	Partnership with McDonalds – Free ticket initiative to local schools	<ul style="list-style-type: none"> • Initiative enabled over 20,000 free tickets to local primary, secondary schools, football clubs, charity organisations

Appendix 3
Alternative Sites Assessment



WELLING UNITED FOOTBALL CLUB

Alternative Sites Assessment

On behalf of **Woolwich Road Limited**

Project Ref: 34093/A5/AK | Date: November 2023

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Document Control Sheet

Project Name: Welling United Football Club

Project Ref: 34093

Report Title: Alternative Sites Assessment

Doc Ref: 24093/A5/AK

Date: November 2023

	Name	Position	Signature	Date
Prepared by:	Alex Kitts	Planning Associate	AK	22/11/2023
Reviewed by:	Greg Pitt	Planning Director	GP	24/11/2023
Approved by:	Greg Pitt	Planning Director	GP	27/11/2023
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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1 INTRODUCTION

- 1.1 This Alternative Sites Assessment has been prepared on behalf of Woolwich Road Limited ('the applicant'), in partnership with Welling United FC, in support of an application for full planning permission for the redevelopment of the Welling United Football Club ('WUFC') Park View Road Stadium and 1-3 Park View Road, Welling DA16 1SY ('the site').
- 1.2 Woolwich Road Limited is a joint venture partnership between Lita Homes and Welling United Football Club to deliver the proposed development in collaboration; this ensures the football club are involved in the application, as they have been with design evolution.
- 1.3 The site covers an area of 1.19 hectares and is located within the administrative area of the London Borough of Bexley ('The Council' or 'Bexley').
- 1.4 The proposed description of development is as follows:
- 'Redevelopment of the site to provide new Welling FC stadium and accompanying football facilities (Class F2), residential dwellings (Class C3) and commercial uses (Class E), along with associated public realm improvements, car and cycle parking, and refuse and recycling stores.'*** ("the development").
- 1.5 The existing facilities are in a very poor state of repair, as pictured in the accompanying design document. The changing rooms are inadequate for purpose, there are leakages due to the state of the roof, and there is little scope to improve the facilities due to income constraints. Additionally, the current facilities and grass pitch significantly limit opportunities for the wider teams within the Welling FC umbrella to play and train on-site.
- 1.6 Without the redevelopment of the site, the club will not be able to maintain itself financially and will therefore cease to operate, which in-turn will result in the loss of various initiatives which benefit the local community significantly; there is therefore an acute need for the site to be rejuvenated to enable the club to grow and maintain itself, which must be delivered through redevelopment of the site, due to financial circumstances.
- 1.7 To address these issues, a comprehensive redevelopment of WUFC's facilities is proposed to ensure the long-term vitality and viability of the football club, and ensure that this important local institution is retained in the long term. The proposed rejuvenation of WUFC's facilities will also enable the club to widen its community offer and therefore generate further benefits to the local population, and further ingrain the club in the local fabric and community.

- 1.8 The site is located on Metropolitan Open Land, and in accordance with NPPF and London Plan requirements, a very special circumstances case is required to support the proposals. The need for a replacement facility is considered to have been fully justified in the Planning Statement and accompanying Very Special Circumstances documents.
- 1.9 However, in order to further support the proposed development, an assessment of all other alternative sites must be carried out in order to ascertain if the existing site represents the best opportunity for the proposed development. Such an assessment would go towards establishing if the proposal could be delivered on an alternative site with either (i) a greater degree of benefits, or (ii) a lesser degree of harm, than that of the existing site.
- 1.10 This document thusly comprises the above; first setting out the methodology for reviewing and assessing each of the identified sites in turn; followed by the findings of each assessment.

A. BACKGROUND

Historic WUFC Options Appraisal

- 1.11 A historic appraisal of WUFC's options was undertaken in April 2019, to determine the viability of a number of development scenarios. As part of the appraisal, the following was confirmed:
- A combined proposal between the existing site and the adjoining Bexleyheath Cricket Club site was progressed around 2017, with 2 year of discussions and a pre-application with the Council undertaken. However, it was determined that no affordable housing could be delivered as part of the proposals, and ultimately Bexleyheath Cricket Club confirmed they were no longer interested in pursuing this development opportunity.
 - A potential partnership with Ancaster garage, opposite the site across Park View Road, was investigated, with residential development delivered on the garage site to cross-subsidise the stadium improvement; however, the Ancaster Garage ultimately confirmed that they were not interested in selling their site for development.
 - With regard to potential relocation of the stadium, the following were explored and ultimately discounted:
 - Bexley Sand & Ballast Site (site was considered too expensive and with too many potential planning complications);
 - Hayden Football Club and Old Dartfordians (owners unwilling to enter into negotiations due to perceived conflict with Dartford FC);
 - Bexleyheath Academy, Goals Soccer Centre (owner unwilling to enter into negotiations due to perceived conflict with Goals Soccer Centre);

- Townley Grammar School (site was too small, with planning complications anticipated due to the primarily residential location);
- St Columbus Catholic Boys School (site was too small, with planning complications anticipated due to the primarily residential location; additionally, the Archdiocese of Southwark refused to proceed with discussions);
- King Henrys School (site suffered from accessibility issues due to the distance to major transport hubs, with planning complications anticipated due to the primarily residential location).
- Other potential relocation and cross-subsidisation options were investigated with respect to Bexley Grammar School and Crook Log Leisure Centre were investigated; it was ultimately determined that the Bexley Grammar School option would not be viable, but that Crook Log Leisure Centre could be a suitable location for a replacement football stadium, with the redevelopment of the WUFC Park View Road stadium to residential to cross-subsidise the stadium development.

1.12 Matters have evolved since, and it is no longer considered that Crook Log Leisure Centre is an appropriate location for a new stadium use; the Crook Log Leisure Centre is a key local institution which provides key services and facilities for the local population, and is owned by the Council for this purpose.

1.13 Additionally, in Bexley's adopted Local Plan (April 2023), Crook Log Sports Centre is designated as Urban Open Space; Policy SP8 of the Local Plan states that Bexley's green infrastructure, including open spaces and waterways will be protected, enhanced, restored and promoted as valuable resources to provide a healthy integrated network for the benefit of nature, people and the economy, in particular by protecting Urban Open Space, only allowing development where the public benefit of the development clearly outweighs any harm.

Other Considerations

1.14 It should also be noted that the WUFC ground was assessed as part of the Council's Green Infrastructure Study (Appendix J Playing Pitch Audit – Sport Specific Action Plan). The site is listed as one of the key football sites in the borough where future investment in sustaining or enhancing quality needs to be focused. It is also listed as one of the priority sites for pitch improvements and improvements to ancillary facilities. The protection and improvement of this site and its facilities is therefore supported by the Council, and has been confirmed during pre-application discussions.

1.15 Furthermore, from review of Bexley's latest available Five Year Housing Supply Assessment (April 2022), there are no identified housing development sites in Welling that have capacity

above 8 units, nor that are capable of accommodating a new football stadium (see Table 4 of the Five Year Housing Supply Assessment).

- 1.16 Nevertheless, in the interest of completeness, the following section undertakes the assessment of alternative sites, by working through various site parameters to understand and filter through potential suitable sites.

2 ASSESSMENT OF ALTERNATIVE SITES

2.1 This section sets out the key matters relied upon to determine appropriate parameters for a replacement site.

A. LOCAL IDENTITY

2.2 In the first instance, it is important to note the purpose of the proposed development as a stadium for WUFC. WUFC are a local institution and football club, and are therefore intrinsically tied to the local fabric.

2.3 WUFC were founded in 1963 and calling the Park View Road stadium its home since 1977. They have a strong local supporter base, and are regularly involved in local community initiatives and charitable partnerships. Appendix 2 of the Planning Statement sets out the club's history and involvement in local initiatives and organisations.

2.4 As such, significant weight should be given to the retention of the club in Welling as this is where it was established and has maintained its home and heritage, providing an important element to the cultural history and identity of the area.

2.5 As such, a general radius of 2km has been applied in determining appropriate sites, given the nature of the development, as well as the size of WUFC as a football club.

2.6 It should be noted that the NPPF recognises that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel". Furthermore, Manual for Streets identifies 'walkable neighbourhoods' as "having a range of facilities within 10 minutes' (up to about 800m) walking distance of residential areas which residents may access comfortably on foot".

2.7 Within Manual for Streets, it is noted that 800 metres is not considered the maximum walking distance for pedestrians, highlighting that walking can replace short car trips, particularly those under 2 kilometres. The National Travel Survey 2020 (NTS) also noted that "81% of all trips under one mile are walks", making it the most frequent mode of travel for very short distances.

2.8 As such, a 2km radius is considered to be appropriate, and a conservative estimate.

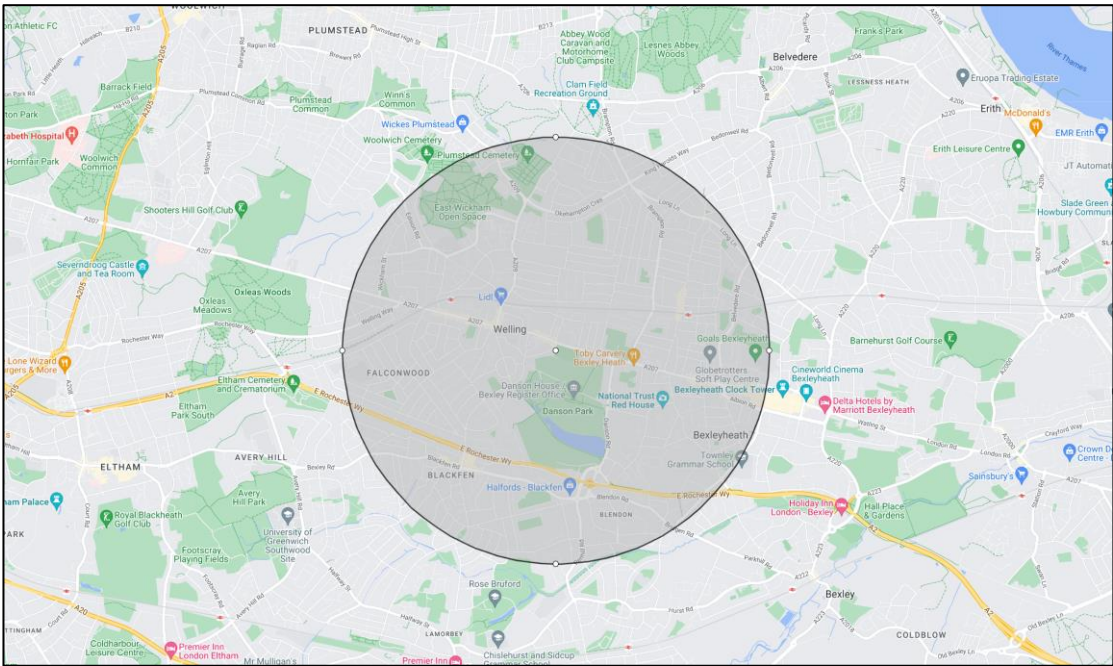


Figure 1: Map of 2km Accessibility Radius

2.9 The above map provides a visual overview of the 2km radius in relation to the existing site. From review, the 2km radius includes the entirety of Welling Town Centre, leading towards Oxleas Woods to the west, part of Bexleyheath town centre to the east, Suburban areas and East Wickham to the north, leading towards Abbey Wood, and Danson Park and suburban areas to the south, including parts of Blackfen, to the south.

B. METROPOLITAN OPEN LAND & OPEN SPACE

2.10 Relocation of the facilities on other Metropolitan Open Land would not have any beneficial impacts over the existing site, given the proposals would be subject to the same issues. The existing site, whilst being designated as MOL, is previously developed land with significant amounts of hardstanding, and is therefore considered to be relatively low value MOL.

2.11 Additionally, as with MOL, it would not be considered appropriate to locate the proposed development on Green Belt land, protected open space, or any identified sites of biological or geological conservation.

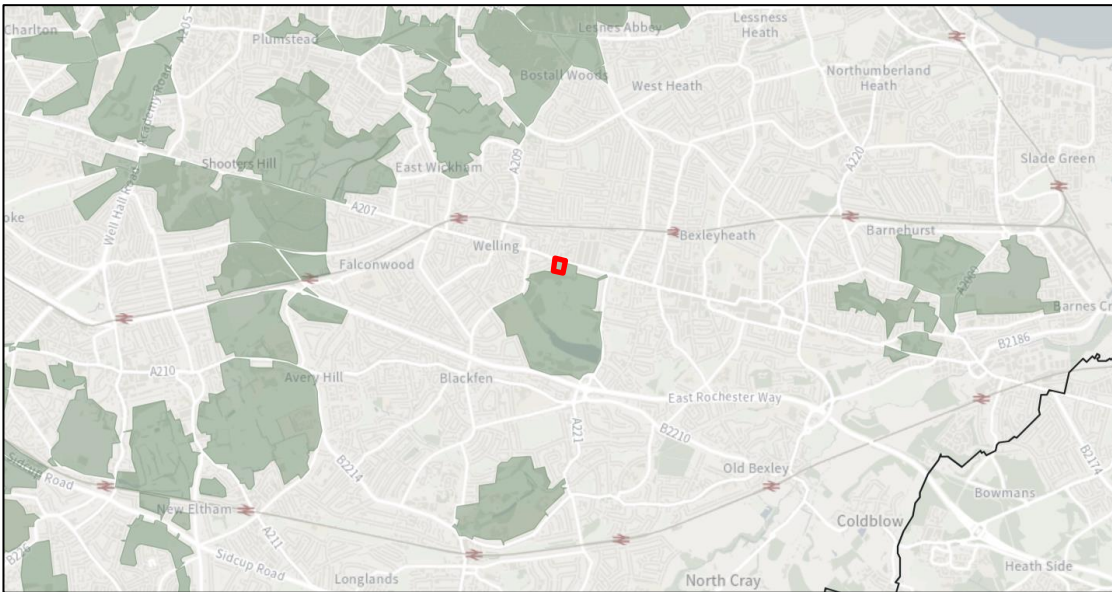


Figure 2: Map of Metropolitan Open Land (GLA Planning Datamap)

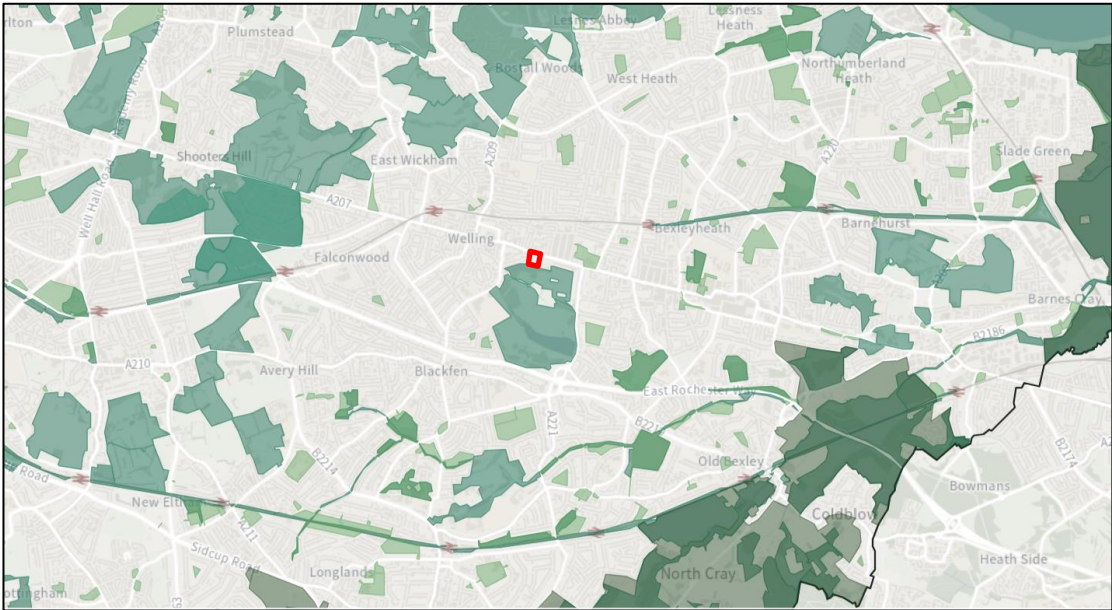


Figure 3: Map of Green Belt, Protected Open Space, SINC and SSSI (GLA Planning Datamap)

- 2.12 The above maps identify designated MOL land, as well as Green Belt, Protected Open Space, Sites of Importance for Nature Conservation (SINCs) and Sites of Special Scientific Interest (SSSIs).

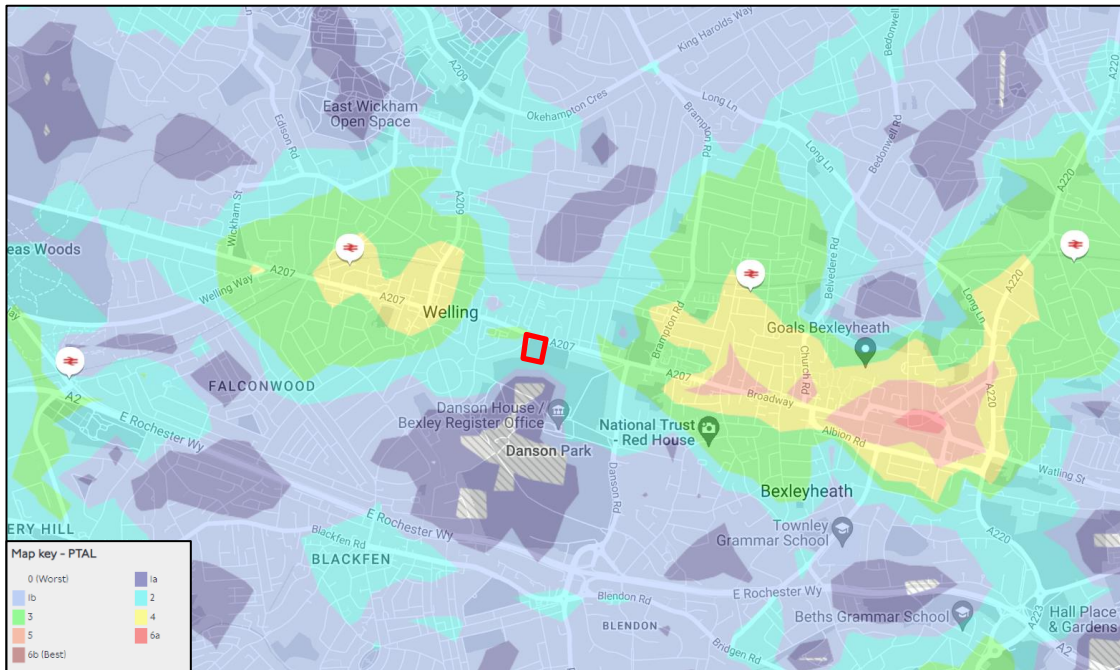
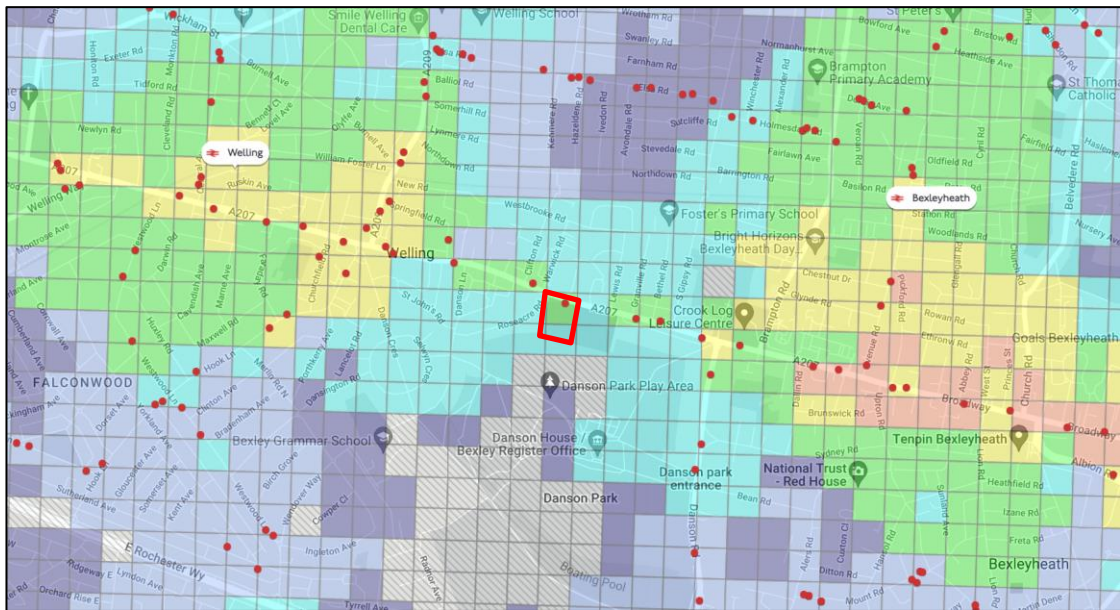
- 2.13 From review, it is evident there is an extensive amount of MOL and land of biodiversity value to the west. Oxleas Meadow; Shooters Hill Woodlands; Shrewsbury Park, Shooters Hill Golf Club, Dothill Allotments & Woodland Farm; Eltham Park; Deansfield; Eltham Warren Golf Course, Gravel Pit Lane and the Nature Study Centre; Phippenhall Meadows; Avery Hill Fields; and

Woodlands Farm, Dryden Road and Hillview Cemetery are all designated as MOL and SINCs, and form a significant stretch of protect open land separating Welling and Falconwood from Shooters Hill and Kidbrooke, towards central London. Oxleas Wood is also designated as a SSSI, which is considered to be an important biological conservation designation.

- 2.14 To the north, East Wickham Open Space, Bostall Heath, Woolwich Cemetery and Plumstead Cemetery also form an extensive patch of MOL and SINCs; beyond this, Lesnes Abbey Woods links up with these open spaces, and is designated as MOL, SINC and a SSSI. These spaces loosely link up with the open spaces to the west, as identified above.
- 2.15 To the south, Lamorbey Park and Penhill Park are also designated as MOL and protected open space, respectively.
- 2.16 There is also a significant extent of Green Belt, MOL and SINC to the east of Bexleyheath and Barnehurst, although it is noted that this land is more distant from the 2km radius than the above spaces and is partially shielded by Bexleyheath Town Centre and its associated built form.
- 2.17 On the basis of the above, it is evident that there are significant open space constraints to the west and north, as well as to the north, these are mitigated given distance and circumstances. Constraints are also present to the south, albeit to a lesser extent.

C. ACCESSIBILITY

- 2.18 Furthermore, the site is located in a relatively accessible location, primarily having a PTAL of 3 (with some elements of 2 along the western and southern portions) and being in close proximity to public transport, most notably regular bus services from the bus stop to the immediate north of the site. The site's relatively high accessibility will reduce reliance on private transport, and the Transport Assessment determines that transport impacts will be acceptable given the site and the package of measures proposed.



Figures 4 & 5: PTAL Maps (TfL WebCAT)

2.19 From review of the maps above, it is evident the site is an accessible location when considering the surrounding area, which is predominantly comprised of PTAL 0 to 1b. The exceptions to this are Welling and Bexley Town Centres, and their outskirts.

2.20 However, it should also be noted that there are potential concerns with locating a football/stadium use in a Town Centre in this low-rise urban typology. Town Centres in such locations provide key services for local residents and are better suited for traditional town

centres uses such as retail, leisure and offices. This is considered to be a typical approach in outer London locations, including most notably Charlton Athletic Football Club.

D. COMPETING FOOTBALL CLUBS

2.21 Finally, it is important to note whether any other football clubs and stadiums are located within the identified areas; as noted above, football clubs are considered to be a key local institution and are part of the local fabric and identity, and it is therefore preferable to avoid locating football clubs in proximity to each other.

2.22 This also has potentially significant impacts on transport, should the clubs play at similar times; should this happen, cumulative transport effects would be pronounced.

2.23 From review of local facilities, it is noted there are a few football clubs in proximity to the site, primarily located to the east of the site.

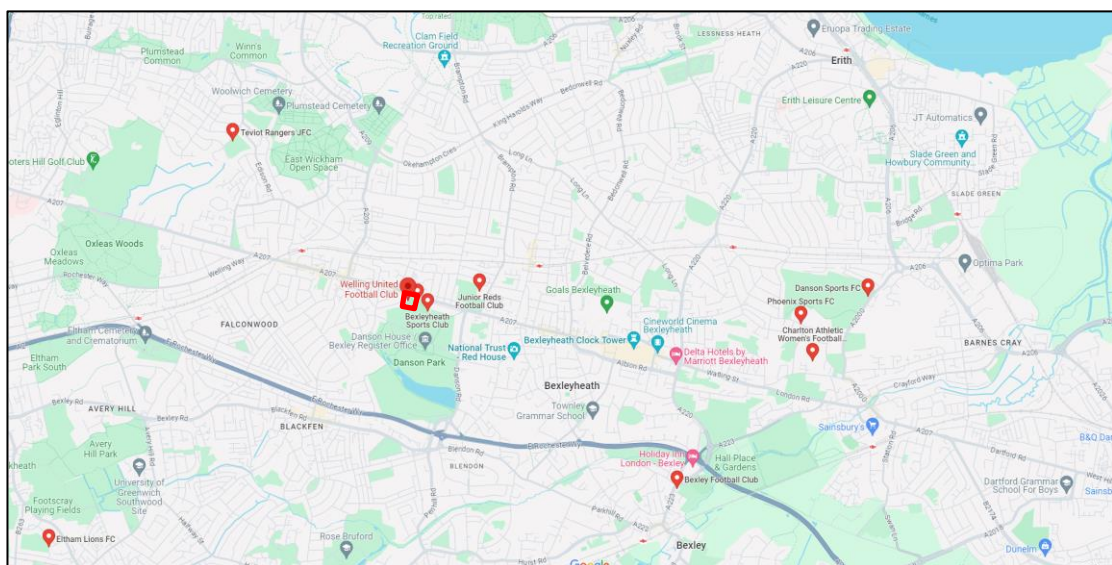


Figure 6: Map of Surrounding Football Clubs

2.24 The above figure provides a broad overview of surrounding football clubs. Of the clubs identified by the above map, the following are considered to be of particular relevance:

- Bexley Football Club; and
- Charlton Athletic Women's Football Club.

2.25 Bexley Football Club are based in Bexley and tied to this area. Bexley were formed in 1884, becoming registered with the Football Association in 1886. The club currently play at St Mary's

Recreation Ground in Bexley, and are in Kent County League's Premier Division (Level 11 on the football pyramid). Whilst the ground does not have any formal standing or seating, it is expected that a certain level of trips and spectators are informally attached to the club and ground.

- 2.26 Charlton Athletic Women's Football Club was founded in 1991 as Bromley Borough, and plays in the Women's Championship. (Level 2 on the football pyramid). As of writing, they are currently in first place in the championship, level on points with Sunderland Ladies (22 points from 11 games played), and therefore has aspirations to progress to the Women's Super League (Level 1 on the football pyramid, the highest level). The football club plays at The Oakwood, Crayford, DA1 4DN, to the east of Bexleyheath Town Centre; the ground has a capacity of 1,180, and is therefore considered to have substantial transport impacts associated with matchdays.
- 2.27 On this basis, it is therefore preferable to avoid locating the new WUFC facility towards the east, to minimise any potential cumulative transport impacts or the erosion of connection of these clubs with local character.

E. SUMMARY & CONCLUSIONS

- 2.28 From review of the parameters set out above, it is clear that there are a number of considerations and constraints identified within the catchment area for alternative sites:
- A 2km catchment area from the site is considered to be appropriate for alternative sites; WUFC are a local institution and football club, and are therefore intrinsically tied to the local fabric. Additionally, 2km is considered to represent a conservative estimate for maximum appropriate distance.
 - The most accessible broad location within the catchment area, with the exception of Welling and Bexleyheath Town Centres, is the strip of land along Park View Road and between Welling and Bexleyheath Town Centres. The site is located within this strip of land, and it is not considered that Welling and Bexleyheath Town Centres are appropriate locations for a new football/stadium use, given their role in the locality. As such, the site is broadly in the most sequentially preferable location from an accessibility perspective.
 - There are significant expanses of MOL, SINC and SSSI land to the west and north of the site, which are considered to represent a worse scenario than the existing MOL site and surroundings. There are also extents of designated green, open land to the south and east, albeit to a lesser extent.
 - The presence of Bexley Football Club and Charlton Athletic Women's Football Club to the east raises potential concerns with erosion of / conflicts with local identity, as well as potential cumulative transport impacts associated with matchday movements.

2.29 On this basis, the existing site is broadly considered to be in a sequentially preferable location for a stadium use. The most sequentially ideal zone is identified on the below map:

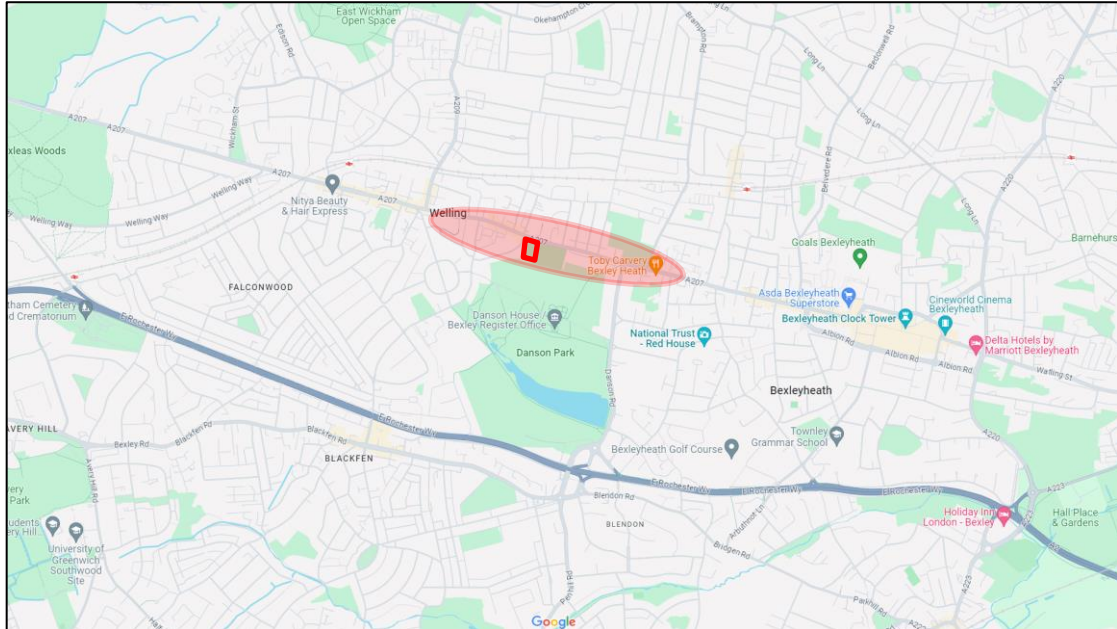


Figure 7: Map of Sequentially Preferable Zone

2.30 From review of the sequentially preferable zone, no alternative sites are identified or considered deliverable for the proposed development; as such, the existing site is considered to represent the best possible option for the proposals.

3 CONCLUSIONS

3.1 This Alternative Sites Assessment has been prepared on behalf of Woolwich Road Limited ('the applicant'), in partnership with Welling United FC, in support of an application for full planning permission for the redevelopment of the Welling United Football Club ('WUFC') Park View Road Stadium and 1-3 Park View Road, Welling DA16 1SY ('the site').

3.2 The proposed description of development is as follows:

'Redevelopment of the site to provide new Welling FC stadium and accompanying football facilities (Class F2), residential dwellings (Class C3) and commercial uses (Class E), along with associated public realm improvements, car and cycle parking, and refuse and recycling stores.' ("the development").

3.3 The site is located in Metropolitan Open Land; as part of the Planning Statement accompanying this planning application, a very special circumstances case has been set out, which demonstrates that the proposed development will give rise to substantial planning benefits that weigh in favour of the application, and which will outweigh any detrimental impacts arising from the proposals.

3.4 However, in accordance with the NPPF, and in order to further support the proposed development, an assessment of all other alternative sites must be carried out in order to ascertain if the existing site represents the best opportunity for the proposed development. Such an assessment would go towards establishing if the proposal could be delivered on an alternative site.

3.5 As set out in this Assessment above, a number of sites have been historically investigated, but found unsuitable for relocation of the club, or for delivery of residential units to cross-subsidise the redevelopment of the Park View Road Stadium.

3.6 Given the relatively unique nature of the site and proposals, this Assessment has undertaken a qualitative assessment of suitable locations for the proposed development, and established the following:

- A 2km catchment area from the site is considered to be appropriate for alternative sites; WUFC are a local institution and football club, and are therefore intrinsically tied to the local fabric. Additionally, 2km is considered to represent a conservative estimate for maximum appropriate distance.

- The most accessible broad location within the catchment area, with the exception of Welling and Bexleyheath Town Centres, is the strip of land along Park View Road and between Welling and Bexleyheath Town Centres. The site is located within this strip of land, and it is not considered that Welling and Bexleyheath Town Centres are appropriate locations for a new football/stadium use, given their role in the locality. As such, the site is broadly in the most sequentially preferable location from an accessibility perspective.
- There are significant expanses of MOL, SINC and SSSI land to the west and north of the site, which are considered to represent a worse scenario than the existing MOL site and surroundings. There are also extents of designated green, open land to the south and east, albeit to a lesser extent.
- The presence of Bexley Football Club and Charlton Athletic Women's Football Club to the east raises potential concerns with erosion of / conflicts with local identity, as well as potential cumulative transport impacts associated with matchday movements.

3.7 On this basis, a broad sequentially preferable zone for the proposed development has been established, which the site falls in. Additionally, from review of the sequentially preferable zone, no alternative sites have been identified or considered deliverable for the proposed development.

3.8 The proposed stadium is therefore justified at this location, given it would be likely to improve the club's longer term financial position and its ability to compete, attract spectators, and links to local residents, providing enhanced facilities and accessibility for all in a location with good public transport links.

3.9 No preferable sites have been identified from the alternative sites exercise; as such, the principle of the replacement stadium on the existing site is considered acceptable and sequentially preferable.

3.10 It should also be noted that the WUFC ground was assessed as part of the Council's Green Infrastructure Study (Appendix J Playing Pitch Audit – Sport Specific Action Plan). The site is listed as one of the key football sites in the borough where future investment in sustaining or enhancing quality needs to be focused. It is also listed as one of the priority sites for pitch improvements and improvements to ancillary facilities. The protection and improvement of this site and its facilities is therefore supported by the Council, and has been confirmed during pre-application discussions.

3.11 Furthermore, from review of Bexley's latest available Five Year Housing Supply Assessment (April 2022), there are no identified housing development sites in Welling that have capacity

above 8 units, nor that are capable of accommodating a new football stadium (see Table 4 of the Five Year Housing Supply Assessment).

3.12 As such, the proposed development is considered to be fully justified in this location.

Appendix 4
Stakeholder Responses

Kitts, Alex

From: Jo Edwards <Jo.Edwards@sportengland.org>
Sent: 04 October 2023 16:02
To: Pitt, Greg
Cc: Kitts, Alex
Subject: Pre-App - Park View Road Stadium, Welling FC - Sport England Ref: PA/23/L/BX/65654

Follow Up Flag: Follow up
Flag Status: Completed

Dear Greg,

Thank you for consulting Sport England on the above proposal.

Sport England –Statutory Role and Policy

The site is considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require statutory consultation by the Local Planning Authority, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 99) and against its own playing fields policy, which states:

‘Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’

Sport England Policy Exceptions	
E1	A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.
E2	The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
E3	The proposed development affects only land incapable of forming part of a playing pitch and does not: <ul style="list-style-type: none">▪ reduce the size of any playing pitch;▪ result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);▪ reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;▪ result in the loss of other sporting provision or ancillary facilities on the site; or▪ prejudice the use of any remaining areas of playing field on the site.
E4	The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

	<ul style="list-style-type: none"> ▪ of equivalent or better quality, and ▪ of equivalent or greater quantity, and ▪ in a suitable location, and ▪ subject to equivalent or better accessibility and management arrangements.
E5	The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Assessment against Sport England Policy

It is proposed to replace the existing pitch with a FIFA compliant 3G pitch and enhanced player and spectator facilities enabled through the redevelopment of part of the site for residential. The latter would not reduce the quality or quantity of the playing pitch and the provision of a 3G pitch in this location would provide significant benefits for the club and also for the wider community. In considering the proposals I have consulted with the Football Foundation and Kent FA that are both fully supportive of the improvements for football. The Football Foundation has commented,

The pitch will need to be constructed to a FIFA Quality Pro performance standard this is a requirement for Step 1 and 2 football. The pitch must be tested and certified annually to the FIFA Quality Programme for Football Turf. The Stadia will need to comply with the ground grading requirements for the level the Club play at.

The FF has also said that if the club wishes to speak to someone in regard to ground grading or the Premier League Stadia Fund that it is able to put them in touch with the relevant person. Please contact Alex Farr Delivery Officer at the FF for more information at alex.farr@footballfoundation.org.uk

In light of the above, and subject to conditions securing the quality of the 3G pitch and a community use agreement, the proposal is considered to meet exceptions E5 of our playing Field Policy and therefore Sport England is likely to support the proposal at application stage.

Any new facilities should be built in accordance with Sport England's technical guidance notes, copies of which can be found at: <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/> and relevant FA guidance.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our playing fields policy or para 97 of NPPF.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

Jo

Jo Edwards MRTPI
Planning Manager

She/her

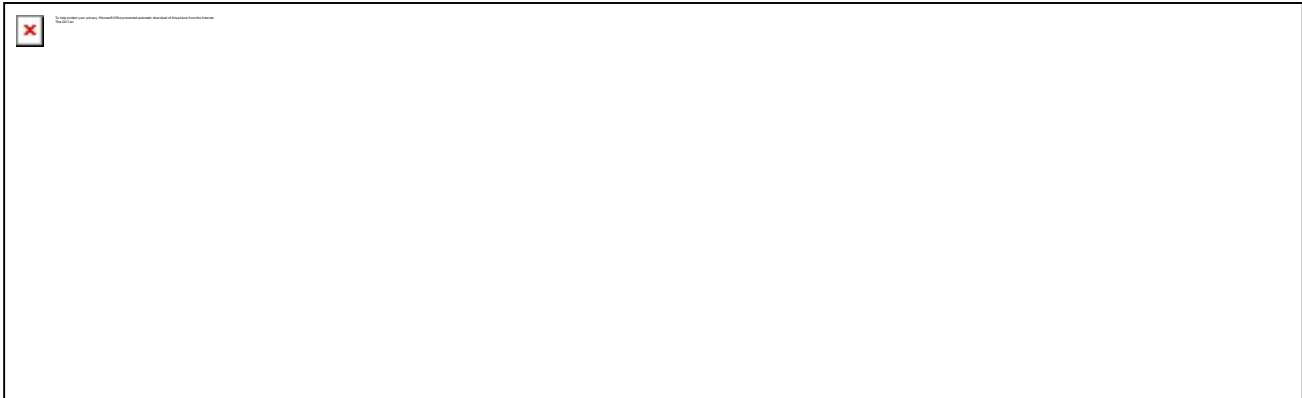
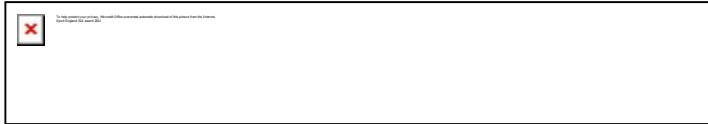
Please note, I don't work Fridays

T: 020 7273 1616

M: 07826 354343

F: 020 7273 1704

E: Jo.Edwards@sportengland.org



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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Kitts, Alex

From: Jeff Davis <Jeff.Davis@kentfa.com>
Sent: 04 October 2023 17:15
To: Kitts, Alex; Shadid@ab-contractors.com; Stephen McGrane
Cc: Neil Twitchett; Issie Collins
Subject: Welling Utd FC development
Attachments: tm0273-ground-grading-handbook-v18_lo-res (4).pdf

Hi Alex,

I hope you are well and thank you for the meeting explaining the project and pre-app discussion. Following the meeting I double checked and although Welling United falls within the boundary of Kent FA the club are affiliated and parented to London FA, therefore my colleague at LFA, Neil Twitchett, would be the lead on this project from now on, we would have a watching brief and support when required.

As highlighted at the meeting the club could use its PL Stadium Fund allocation (dependant on whether it has used this over the past 5 years) for off the pitch activity (step 2 clubs can access £250k). Regarding questions on turnstiles (step 2 only 8 are needed, however this rises to 8 if the club were to get promoted to step 1) and exit/entrances please see [Guide to Safety at Sports Grounds 'Green Guide' - Sports Grounds Safety Authority](#) [Sports Grounds Safety Authority \(sgsa.org.uk\)](https://www.sgsa.org.uk) and the attached ground grading document for your use. Hopefully this will help until you bring Neil up to speed on your proposed scheme.

In principle, Kent FA are in support of your proposals and development of a 3G pitch for the community notwithstanding that we haven't seen the finer detail of the programme of use.

Yours sincerely

Jeff Davis

Jeff Davis
Head of Football Development and Investment
Kent County Football Association
Invicta House | Cobdown Park | London Road
Ditton | Near Aylesford | Kent | ME20 6DQ

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Kitts, Alex

From: Alex Farr <Alex.farr@footballfoundation.org.uk>
Sent: 06 October 2023 12:15
To: Kitts, Alex
Cc: Pitt, Greg; Isabella Rossi; Muhammad Shahid
Subject: RE: Welling FC - Proposed Development

Hi Alex,

Thank you for the email.

Welling United may be eligible for Premier League Stadium Funding (PLSF). This funding is aligned to ground grading requirements. Please follow the link below to find out more details around PLSF, it would be worth review this with the Club as they may be eligible for funding
<https://premierleaguestadiumfund.co.uk/>

If you have any further development proposals outside of what we've already commented on, which the funding would be delivering, please liaise through Sport England and we can also feed in on a planning perspective.

Kind Regards

Alex Farr
Delivery Officer (South & East Region)

The Football Foundation
Wembley Stadium | Wembley | London | HA9 0WS
M 07513710702

E Alex.Farr@FootballFoundation.org.uk W www.FootballFoundation.org.uk



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From: Kitts, Alex <alex.kitts@stantec.com>
Sent: Friday, October 6, 2023 10:21 AM
To: Alex Farr <Alex.farr@footballfoundation.org.uk>
Cc: Pitt, Greg <greg.pitt@stantec.com>; Isabella Rossi <irossi@ullproperty.com>; Muhammad Shahid <Shahid@ab-

contractors.com>

Subject: Welling FC - Proposed Development

Hi Alex

I understand you are the delivery officer at the Football Foundation. Jo Edwards from Sport England has shared your contact details with us (see attached email chain).

My colleague Greg Pitt and I are instructed by Welling FC and their development partner, Lita Homes to bring forward a planning application for circa 100 homes that will enable improvements/upgrades to the existing football stadium.

We are moving towards submission of a planning application in the next month or so, and are keen to discuss potential funding options for the scheme and club. We are also happy to present and discuss the scheme with you if you'd like.

Whilst we are currently in the process of refining the scheme, the below link contains key documents from our latest GLA pre-application, which should give you a good idea of what the proposals entail.

[Download all files](#)

Do let us know if you would like to meet to discuss the scheme, and if so, what availability you have for this.

Happy to discuss over the phone.

Kind Regards
Alex

Alex Kitts

Planning Associate

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London W1D 3QB



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Appendix 5
Economic Benefits Infographic

ECONOMIC BENEFITS

Welling Football Club Redevelopment

Redevelopment of the site to deliver a new football stadium and facilities (Class F2), commercial space (Class E), and residential units above (Class C3).

EMPLOYMENT SUSTAINED
OVER CONSTRUCTION PHASE

DIRECT:
295

INDIRECT:
384

£73.7M
IN GVA

104 NEW HOMES
SUPPORTING

210
RESIDENTS

RESIDENT
RETAIL AND
LEISURE
EXPENDITURE

£2.5M
PER ANNUM

GENERATING

£8.0M

GVA PER ANNUM

COUNCIL TAX & BUSINESS
RATES SUPPORTING
LOCAL SERVICES

£250,000
PER ANNUM

FLEXIBLE COMMERCIAL SPACE

EMPLOYMENT
OPPORTUNITIES

10
JOBS

£334,000
GVA PER ANNUM

NEW FOOTBALL STADIUM AND FACILITIES

FLEXIBLE
COMMUNITY
SPACE

INCREASED
EMPLOYMENT
OPPORTUNITIES

COMMUNITY
FOOTBALL HUB

4000+
CROWD CAPACITY