

Planning Statement

Proposal: Erection of two no. two-storey, Four-bedroom dwellings with Loft Space and a Small rear Dormer with associated refuse and 2 EV Car parking Space

Location: 50 Sycamore Avenue, Sidcup, Kent, DA15 8PL.

Date: Dec 2023.

Introduction

This statement has been produced to support the accompanying planning application for the erection of two no. two-storey, three-bedroom dwellings with associated parking at 50 Sycamore Avenue, Sidcup, Kent, DA15 8PL. It forms part of the application and should be read in conjunction with the accompanying plans and other planning application documents.

This statement has been submitted to enable the details of the scheme to be fully explained and the planning merits of the application to be presented. It is structured as follows:

Section 2 describes the application site and its surroundings;

Section 3 provides a description of the proposed development;

Section 4 sets out the planning history of the site;

Section 5 provides details of relevant development plan and government policy;

Section 6 provides a detailed discussion of the planning merits of the case;

Section 7 provides a conclusion.

It is hoped that this statement will assist the local planning authority in its consideration of this application.

The Site

The site is located on the south-eastern side of Sycamore Avenue. It is broadly triangular in area and contains a derelict, single-storey building. The site is served by an access road which leads from Sycamore Avenue. Although the owners of the site do not own the access road, they have legal rights of way along it.

- 2.2 The access road forms the northern boundary of the site. Beyond this lie the rear of commercial properties facing Blackfen Road and the residential property at no. 52 Sycamore Avenue. The site is bounded to the south-west by the residential dwelling and associated garden area of no. 48 Sycamore Avenue. Beyond the south-eastern boundary of the site lies the rear garden areas of residential properties which front Days Lane.

3.0 The Proposal

Background

The applicant has requested pre-application advice relating to the proposed development of this site on two previous occasions. Advice was received on 17 May 2022 and 1 December 2022. On each occasion, the advice was supplemented with an online meeting with the planning case officer.

The most recent scheme proposed the construction of a pair of semi-detached dwellings. Erection of two no. two-storey, three-bedroom dwellings with associated parking. Reference number 23/00421/FUL granted permission 1st June 2023.

A copy of the application decision relating to that scheme, dated 1st June 2023, is contained at Appendix 1 of this statement for reference.

The current scheme is an amendment to the previously approved scheme. Our idea is to apply for two slightly larger dwellings for the following reasons as the applicant who recently purchased the property with the approved scheme. As he was preparing quotation and building regulation plans for the development, we accessed the following issues.

1, New building regulation stipulates a 350mm cavity wall, the approved scheme has a 300mm thick wall as per the previous building regulation.

2, The previous scheme has a floor area of 86.38 sq.m for each dwellings

The combination of the above point, significantly reduce this floor area making that scheme if constructed, the final internal room sizes would not meet the criteria, and render the property too small for quality accommodation for a family of 4-5 person.

This proposal relates to the erection of two no. two-storey, four-bedroom detached dwellings with loft floor level, and small rear dormer with associated refuse and recycle bins and 2 EV car parking space. Each dwelling would accommodate an open plan living/kitchen/dining room, hall and wc at ground floor level. Three bedrooms and a bathroom would be provided at first floor level.

One EV off-street car parking space would be provided for each dwelling. In addition, each property would benefit from a generous-sized private garden area which would contain a bin store and cycle store.

This submission is also accompanied by the following documents:

Phase 1 Land Contamination Desk Study.

Arboricultural Report and Tree Survey.

Fire Strategy Statement.

Sustainable Design, Construction and Renewable Energy Statement.

Planning History

The most relevant planning history relating to this site is summarised below:

Bexley planning reference 07/08965/OUT.

Outline application for residential re-development of site for erection of 2 x 2 storey blocks comprising 2 x 2 bedroom and 2 x 1 bedroom flats with associated parking.

Withdrawn: 5 December 2007.

Date of Decision: 1st June 2023

Erection of 2 new dwellings with associated parking.

Referred to in the application for permission for development received on 23rd February 2023.

Planning Policy

The most relevant planning policy relating to this proposal is summarised below under the following headings:

The Development Plan.

Other Policy Documents.

The Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. For the purposes of the current application the development plan comprises the London Plan, the Bexley Core Strategy and the Bexley Unitary Development Plan.

The London Plan

The London Plan was adopted in 2021 and replaces the previous version of the London Plan which was adopted in 2016.

The most relevant policies of the London Plan that relate to the current application are listed below:

GG2 Making the best use of land.

GG3 Creating a healthy city.

GG4 Delivering the homes Londoners need.

D3: Optimising site capacity through the design-led approach.

D4 Delivering good design.

D5: Inclusive design.

D6: Housing quality and standards.

D7: Accessible housing.

D12(a) Fire safety.

H1 Increasing housing supply.

H2 Small sites.

H4: Delivering affordable housing.

H10: Housing size mix.

G6: Biodiversity and access to nature.

SI1: Improving air quality.

SI2: Minimising greenhouse gas emissions.

SI5: Water Infrastructure.

SI13: Sustainable drainage.

T5: Cycling.

T6: Car parking.

T6.1: Residential car parking.

Bexley Core Strategy

5.5 The Bexley Core Strategy was adopted on 22 February 2012. It sets out the Council's long-term vision for development in the borough.

5.6 The most relevant policies of the Core Strategy that relate to the current application are listed below:

- CS01: Achieving sustainable development.
- CS08: Adapting to and mitigating the effects of climate change, including flood risk management.
- CS10: Housing need.
- CS18: Biodiversity and geology.

Bexley Unitary Development Plan (UDP)

5.7 The UDP was adopted on 28 April 2004 but some policies expired in 2007. Following the adoption of the Core Strategy in 2012, some UDP policies were replaced.

The most relevant policies of the UDP that relate to the current application are listed below:

ENV39: Built environment.

H3: Character.

H6: Amenity.

H7: Privacy and outlook.

H8: Infill, backland and similar development.

T17: Off-street parking.

Other Policy Documents

5.9 There are other policy documents which are relevant to the proposed development. The most relevant are summarised below:

National Planning Policy Framework

5.10 The National Planning Policy Framework (NPPF) was first published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. This sets out the government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions.

Paragraph 11 of the NPPF is particularly relevant and is set out below:

Plans and decisions should apply a presumption in favour of sustainable development.

For **decision-taking** this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission*

unless:

- *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Planning Merits

The main considerations in the assessment of this proposal relate to the following issues:

- principle of development;
- design and visual impact;
- impact on residential amenity;
- highway issues;
- trees;
- biodiversity;
- contamination;
- presumption in favour of sustainable development.

These issues are discussed below:

Principle of development

6.3 The principle of the proposed residential development finds strong support in the NPPF. Paragraph 60 is particularly relevant:

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

In addition paragraph 69 requires that in order to promote the development of a good mix of sites local planning authorities should, *inter alia*, “support the development of windfall sites through their policies and decisions”.

The principle of the development also finds strong support in the London Plan. Objective GG4 seeks to deliver the homes Londoners need and requires that those involved in planning and development must, *inter alia*, “ensure that more homes are delivered”.

In addition, objective GG2 and Policy D3 seek to “make the best use of land”. Indeed, objective GG2 requires those involved in planning and development to *inter alia*, “proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”.

Policy H1 seeks to increase housing supply and sets the ten-year targets for net housing completions that each local planning authority should plan for. Table 4.1 sets out the ten-year targets for net housing completions (2019/20 - 2028/29). For Bexley the ten-year housing target is 6,850. In addition, Policy H2 sets out the requirement for boroughs to pro-actively support well- designed new homes on small sites (below 0.25 hectares in size) through planning decisions. Table 4.2 sets out the ten-year minimum targets (2019/20-2028/29) for net housing completions on small sites. For Bexley the target is 3,050. This proposal would assist in meeting these targets.

Policy H1 further states that in order to ensure that ten-year housing targets are achieved, boroughs should, *inter alia*, “encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period”. At a local level, the principle of the proposed development can be justified by Policy CS01 of the Core Strategy which states that the Council will seek to meet the London Plan housing target for Bexley. It also requires that sustainable development will be achieved by, *inter alia*, “ensuring housing provision meets the needs of Bexley’s current and future population”.

Although the site lies within Blackfen District Centre as defined on the UDP Proposals Maps, this does not preclude the provision of residential development within such areas. It should also be noted that in the Council’s pre-application advice dated 1 December 2022 no objection was raised to the principle of residential development on this site:

The proposal would result in an increase of two self-contained dwellings, contributing to regional and local housing targets. Three bedroom houses are also a housing type that is in shorter supply. The buildings would be in a residential location, and therefore the principle of a residential use is acceptable on this site.

In light of the above assessment, it is considered that the principle of residential development on this site must be considered acceptable.

Design and visual impact

At a national level good design is one of the central requirements of the NPPF:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. (Paragraph 126)

This requirement is reflected in Policies D4, D5 and D6 of the London Plan as well as at a local level in Policy CS01 of the Core Strategy and Policies H3, H6 and H8 of the UDP.

Sycamore Avenue is characterised by predominantly two-storey, terraced residential properties of a similar scale and broadly similar design. There are also some examples of two-storey, detached dwellings. The elevational treatments are mixed and include brick and various types and colour of render.

In the previous application for pre-application stage, the advice given on, the three different options were provided for the siting of the proposed dwellings. The siting shown on the drawings accompanying this application corresponds to that favoured in the pre-application advice and the recent approved application. In relation to this option the pre-application advice included the following comments:

This contains most elements that we think would be acceptable. There is good space at the frontage between the houses, the house with narrower frontage addressing the streetscape, and the position of the parking.

This proposed scheme is similar in the architectural and materials proposed and the character of Sycamore Avenue and the previous approved scheme.

This proposed development has been sensitively designed to ensure that it complements the character of the locality. The properties are comparable in terms of scale mass materials to neighbouring dwellings along Sycamore Road. The size of the footprint of each property would be similar to that of other nearby dwellings and the ridge and eaves heights would broadly correspond with those of neighbouring properties.

This proposal are attractive in appearance and would provide a high quality development. Each incorporates a two-storey projection to the front elevation which enhances the design and provides visual interest. This would be complemented by the use of appropriately chosen materials including facing brick and plain roof tiles and one roof light s along the front roof slope. Theis would reflect the broad palette of materials used on other residential dwellings within the immediate area. In addition, appropriate detailing has also been provided. This includes brick detailing at the head of each window and concrete sills at the base.

The site is of sufficient size to enable the proposed dwellings to sit comfortably within this plot and for suitable garden areas to be provided. In this respect, the proposal could not be considered to be cramped or to result in an overdevelopment of the site.

In light of the above analysis it is considered that this proposal would provide a high-quality development that would meet the tests set out within the NPPF, Policies D4, D5 and D6 of the London Plan, Policy CS01 of the Core Strategy and Policies H3, H6 and H8 of the UDP in relation to the requirement for good design.

Impact on residential amenity

Paragraph 127 of the NPPF requires planning decisions to, *inter alia*, provide “a high standard of amenity for existing and future users”. In addition, Policy D3 of the London Plan requires developments to “deliver appropriate outlook, privacy and amenity”. At a local level Policy H7 of the UDP contains the following requirement:

Residential development should provide a reasonable degree of privacy and outlook for space within and outside dwellings.

The development has been sensitively designed so that it would not result in a loss of privacy to neighbouring residential properties. There would be no window-to-window overlooking or loss of privacy to private garden areas of nearby dwellings. The distance between the rear of the proposed dwelling on house Type B and the rear elevation of the nearest property no. 303 Days Lane would be approximately 25.3m. and 31. 2m for House Type A to the nearest property on Days Lane. Furthermore, the trees on the south-east boundary of the site would be retained which would mitigate any views between the properties. Due to the significant separation distance and the presence of trees on the rear boundary there would not be a loss of privacy to nearby occupiers in Days Lane.

one windows is proposed on the first floor of the south-western elevation of the proposed property on house Type A ,this would serve the stairway. The opposite site, N.W elevation will have two obscure window at first floor level, to provide addition natural daylight to the bedrooms It is proposed that this would be non-opening and obscure glazed to protect the amenity of the occupiers of the neighbouring property at no. 48 Sycamore Avenue.

In addition, due to the design, siting, orientation and limited scale of the development, it is considered that there would be no significant loss of sunlight, daylight or outlook to neighbouring properties.

In light of the above, it is considered that the proposed development would not have a significant impact upon the residential amenity of neighbouring occupiers.

The proposed development would also provide a very good level of amenity for future occupants. The “Technical housing standards – nationally described space standard” was published by the Department for Communities and Local.

Government in March 2015. This document sets out requirements for the gross internal area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home.

Policy D6 of the London Plan also provides minimum space standards for dwellings of different sizes. These are identical to those set out in the “Technical housing standards nationally described space standard”.

Each property would comprise a two-storey, four-bedroom, four to five-person dwelling.

The required minimum gross internal floor area allowed for a 4 Bed house, 5 person is 97 sqm. The proposal for House Type A is 132.3 sq.m and House Type B 154.5 sqm. As such the proposal would exceed the minimum requirements for gross internal floor areas as set out in the “Technical housing standards – nationally described space standard” and the London Plan.

In addition, the room sizes are generous and as a result of the design of the development there would be adequate levels of privacy, amenity, outlook and security. The proposed dwellings would also benefit from generous rear garden areas which would significantly exceed the minimum standards set out in Policy D6 of the London Plan. As such it is considered that the proposal would secure a good standard of amenity for future occupants.

Highway issues

Policy T6.1 of the London Plan relates to residential parking. This states that new residential development should not exceed the maximum parking standards set out in Table 10.3. The standards vary according to the PTAL value relating to each particular site.

Transport for London (TfL) measures transport connectivity in London using the PTAL measure (Public Transport Access Level). PTAL rates a selected place based on how close it is to public transport and how frequent services are in the area. PTAL values range from zero to six, where the highest value represents the best connectivity. For historical reasons, the PTAL value of one is split into two categories (1a and 1b) and the PTAL value of six is split into two categories (6a and 6b). In total there are nine possible values of PTAL: 0, 1a, 1b, 2, 3, 4, 5, 6a and 6b.

This site has a PTAL value of 2. The maximum parking standards set out in Table 10.3 of the London Plan indicate that for dwellings with three or more bedrooms in areas of PTAL 2-3 in outer London there is a requirement for up to 1.0 spaces per dwelling. This proposal would provide one car parking space per dwelling and as such would meet the requirements of Policy T6.1 of the London Plan.

In the previous application and pre-application advice dated 1 December 2022, the following guidance was provided: The distance between the back of the parking spaces and the boundary opposite needs to be at least 6m to allow satisfactory turning of vehicles, which would accord with standard highway design guidance.

This proposal, for 2 car parking spaces for each dwelling, have been sited to meet this rare per the previous scheme requirement. It should also be noted that cycle storage for 8 bicycles, facilities have been provided for 4 bikes to each property meeting the The Home Quality Mark (HQM) The Protect a Cycle is designed to comply with the requirements of the Home Quality Mark and is certified to LPS 1175 Issue 8: Security Rating 1/A1. Certificate Number 899c External containers specifically designed for the secure storage of bicycles and other property should be certificated to one of the following minimum security standards:
LPS 1175 Issue 7.2:2014 Security Rating 1 (or above); or
LPS 1175 Issue 8:2018 Security Rating 1/A1 (or above); or
STS 202 Issue 7:2016 Burglary Rating 1 (or above); or
LPS 2081 Issue 1.1:2016 Security Rating A; or
Sold Secure (Bronze, Silver or Gold).

Trees

There are a number of trees located in proximity to the south-eastern boundary of the site. A detailed tree survey has been carried out which accompanies this submission. The trees have been categorised in accordance with BS5837 2012: 'Trees in Relation to Demolition, Design and Construction'. This demonstrates that most trees fall within category C (trees of low quality and value) or category U (trees which may require removal on health and safety grounds, be in decline, infected by significant pathogens or, due to their current condition would lose their existing value within 10 years).

There is just one tree, a Hornbeam, which falls within category B (trees of moderate quality or value).

Although the trees adjacent to the south-eastern boundary of the site fall within category C or U, they contribute to the character of the area. They also provide privacy to the occupiers of properties which lie to the south-east of the site in Days Lane. As such it is proposed that these trees are trimmed and retained rather than removed.

The Hornbeam is located further within the site. As it is a category C tree of moderate quality, it is proposed that this is removed and a more suitable replacement provided in a more appropriate location within the site.

Biodiversity

The NPPF seeks to protect and enhance biodiversity and geodiversity. Paragraph 180d is particularly relevant and states the following:

development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

The requirement to protect and enhance biodiversity is also contained in Policy G6 of the London Plan and Policy CS18 of the Core Strategy. Due to the urban location of the site and its limited size, the opportunity to increase biodiversity is limited.

However, the following measures will assist in protecting and enhancing biodiversity:

The retention of the existing trees adjacent to the south-east boundary of the site will assist in maintaining the biodiversity of the site. Bird and bug boxes and habitat logs will be incorporated within the garden areas of each of the proposed new dwellings to increase biodiversity. Wildflowers will be introduced in the garden areas. Bird and bug boxes and habitat logs will be incorporated within the garden areas of each of the proposed new dwellings to increase biodiversity.

Wildflowers will be introduced in the garden areas.

Contamination

Paragraph 183 of the NPPF requires that planning decisions should ensure that, *inter alia*, “a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination”. Similarly, Policy CS01 of the Core Strategy requires developers to address pollution issues, including contamination.

The Council’s pre-application advice dated 1 December 2022 also confirmed that a Phase 1 Land Contamination Desk Study would be required in relation to contamination issues. This application is accompanied by such a report which is broken down into 5 parts. Part 1 has the main report, figures, table, testing and photos. The maps are split across parts 2-5 of the report.

The Phase 1 Land Contamination Desk Study provides the following conclusions and recommendations:

A review of desk study data of the Site was undertaken, and the Site was visited for a Site walkover. A preliminary risk assessment, presented in Table 1, concluded that the environmental risk to Site Occupants and other onsite receptors from onsite contaminated soil was low.

The risks to offsite receptors were considered low as contamination levels were likely to be low and the Site was located over unproductive strata. The environmental risk to onsite receptors from offsite sources was assessed as low. No sources were identified near the Site. No further environmental investigation is considered necessary. If undetected contamination is present, these conclusions may be affected.

Presumption in favour of sustainable development

As set out at paragraph 5.11 above, the NPPF contains a presumption in favour of sustainable development. The NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). These are defined in paragraph 8 of the NPPF

as follows:

an economic objective – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places*

*and at the right time to support growth, innovation and improved productivity;
and by identifying and coordinating the provision of infrastructure;*

a social objective – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

an environmental objective – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

It is considered that the proposed development would achieve the economic, social and environmental objectives required by the NPPF and as such would result in sustainable development in the following ways: the site is located within the Blackfen District Centre which contains local retail and business facilities;

the site is located within the urban area in proximity to local community facilities including schools, places of worship, medical facilities and areas of public open space; slightly further afield lie Sidcup and Welling (which are defined as Major

District Centres) and Bexleyheath (which is defined as a Strategic Centre) the application site is located in a sustainable location in proximity to good public transport links; These include bus routes 132 and N21 (available from Blackfen Road), 51 and 625 (available from Wellington Avenue) and B13 (available from Days Lane).

Falconwood train station is also within walking distance of the site. This is served by regular services from Southeastern. the development would make effective use of land in accordance with Section 11 of the NPPF;

- the proposal would assist in increasing the supply of housing required to meet the needs of present and future generations; where possible materials to be used in the construction of the development would be sourced locally;
- the development would follow good sustainable practice and would be undertaken to a high modern standard with efficient heating systems and insulation levels. It would also incorporate solar panels.

In light of these considerations, the proposal would clearly form a very sustainable form of development. As such it should be considered favourably in accordance with paragraph 11 of the NPPF.

Conclusion

This statement sets out a strong and compelling planning case to support this application. It has clearly demonstrated that there is no objection to the broad principle of the proposed development and that it is acceptable in terms of its design and visual impact.

This statement has also shown that the proposal would be acceptable in terms of its impact upon residential amenity, highway safety, trees within the site, biodiversity and contamination. Furthermore, the development constitutes sustainable development and as such should be considered favourably in accordance with paragraph 11 of the NPPF.

It is considered that the proposal is acceptable in planning terms and that there are no material considerations that would justify a decision other than the grant of planning permission. For the reasons set out in this statement the Council is requested to grant permission for this application.