



Head of Planning and Development  
London Borough of Bexley  
Civic Offices  
2 Watling Street  
Bexleyheath  
DA6 7AT  
**FAO: Ian Smith**

13<sup>th</sup> February 2024

Ref. SP23-1074

Dear Sir,

**Town and Country Planning Act 1990**  
**35 Upper Wickham Lane, Welling, DA18 3AD**

Simply Planning Limited (SPL) is instructed by our client, Brightstar Ltd, to submit the enclosed full planning application in respect of 35 Upper Wickham Lane, Welling, DA18 3AD. The application seeks permission for the:

*“Upward extension of 35 Upper Wickham Lane to provide a four storey, mixed use building comprising 1no. 3 bed HMO and 5no. 4 bed HMOs (Use Class C4) on first to third floors together with commercial space (Use Class E) retained on the ground floor.”*

In support of this application, we enclose the following information:

- An Architectural Drawing Package, prepared by T2S Architecture Ltd comprising the following drawings:

Drawing No.	Drawing Title	Scale
127_GA_05 REV B	Site Location Plan	1:100 @ A3
127_GA_06 REV B	Proposed Site Block Plan	1:100 @ A3
127_GA_00 REV C	Proposed Ground Floor Plan	1:100 @ A3
127_GA_01 REV C	Proposed First Floor Plan	1:100 @ A3
127_GA_02 REV C	Proposed Second Floor Plan	1:100 @ A3
127_GA_03 REV D	Proposed Third Floor Plan	1:100 @ A3
127_GA_04 REV B	Proposed Roof Plan	1:100 @ A3
127_GE_01 REV C	Proposed West Elevation	1:100 @ A3
127_GE_02 REV C	Proposed East Elevation	1:100 @ A3
127_GE_03 REV C	Proposed South Elevation	1:100 @ A3
127_GE_04 REV C	Proposed North Elevation	1:100 @ A3
127_EE_01 REV B	Existing West and South Elevation	1:100 @ A3
127_EE_02 REV B	Existing North Elevation	1:100 @ A3
127_EE_03 REV B	Existing East and West Courtyard Elevation	1:100 @ A3

Drawing No.	Drawing Title	Scale
127_EE_04 REV B	Existing South and East Courtyard Elevation	1:100 @ A3
127_ES_01 REV B	Existing Section A	1:100 @ A3
127_EX_00 REV B	Existing Ground Floor Plan	1:100 @ A3
127_EX_01 REV B	Existing First Floor Plan	1:100 @ A3
127_EX_RF REV B	Existing Roof Plan	1:100 @ A3
127_PL1_GS_01 REV C	Proposed Section A	1:100 @ A3
127_PL1_GS_02 REV C	Proposed Section B	1:100 @ A3
127_PL1_FX_00 REV C	Fire Strategy Ground Floor Plan	1:100 @ A3
127_PL1_FX_01 REV C	Fire Strategy First Floor Plan	1:100 @ A3
127_PL1_FX_02 REV C	Fire Strategy Second Floor Plan	1:100 @ A3
127_PL1_FX_03 REV D	Fire Strategy Third Floor Plan	1:100 @ A3
127_PL1_FX_04 REV C	Fire Strategy Site Location Plan	1:100 @ A3

- Design and Access Statement (127\_ DAS \_ Rev D) prepared by T2S Architects Ltd.
- Daylight and Sunlight Assessment prepared by Right to Light Consulting.
- Fire Statement prepared by Fire Safety South East.

This supporting planning statement sets out the planning context for consideration of the application proposals. In particular, it assesses the proposal against the relevant policies of the Statutory Development Plan and national guidance. It demonstrates that the proposal complies with that guidance and accordingly, consistent with the NPPF, should be granted consent without delay.

We confirm that the requisite planning fee will be paid via the Planning Portal

## Site and Planning Background

The application site comprises a roughly rectangular plot of land located at 35 Upper Wickham Lane within Welling District Centre. It has an area of approximately 300m<sup>2</sup>. The site, in its context, is shown in the ariel image below.



The site comprises a two storey terraced property with a flat roof and is of low architectural merit. The property comprises at ground floor two retail units, one of which is occupied by a training centre whilst the other unit is vacant. 2no. two bed self-contained flats are located on the first floor.

The application site forms part of an established terrace, comprising a variety of 1 to 4 storey mixed use properties of varying built form. The terrace includes ground floor commercial units with a mix of residential and commercial accommodation above.

The application site is situated within the Major District centre of Welling within an identified 'Sustainable Development Location'. The building is not located within or adjoining a Conservation Area and is not listed nor included on any locally list.

## Planning History

From the Council's online Planning Register the following decisions appear in respect no. 35 Upper Wickham Lane.

Application Reference	Description of Development	Decision/Date
14/00296/FUL	Change of use to an office/training facility.	Granted (17.04.2014)
11/00560/FUL	Conversion of first floor offices to 2 x 2 bedroom flats.	Granted (07.06.2011)
03/02007/FUL	Alteration to ground floor to form 2 separate retail shops. Change of use of part first floor to provide a self-contained unit of residential accommodation.	Granted (23.06.2003)

As can be seen from the above history, the site is in lawful use as two separate retail units on the ground floor with 2no. 2 bed flats located on the first floor.

## Pre-Application Advice and Evolution of Proposals

Prior to the submission of the application a pre-application enquiry was submitted to LB Bexley seeking advice in relation to the proposed construction of a 26 bed HMO with commercial space retained on the ground floor.

A pre-application meeting was held with Ankit Dhakal on the 28<sup>th</sup> July 2023, where the proposal were presented and discussed. A written response was then subsequently received on the 8<sup>th</sup> September 2023 and is provided at **Document 1**.

In summary the pre-application advise found:

- The use of the property to provide HMO accommodation at this location would be appropriate given its town centre location with very good access to the nearby transport links such as buses and the train station.
- A 26 bed HMO would not lead to an overconcentration of HMO uses which might otherwise be detrimental to the residential character of the area.
- The overall height resulting from the extension was considered compatible with the scale of development along Upper Wickham Lane and the High Street.
- The proposal would not cause significant harm to the character and significance of the wider area.

- As the site is located within the Welling Town Centre Control Parking Zone, a condition would be recommended to prevent future occupiers from obtaining a parking permit. In this context, the proposals would not therefore cause unacceptable impact on the functioning of the local highway network.
- The proposed development would not result in any adverse impact on the amenities of occupiers of the adjoining properties in terms of loss of light or overbearing impact.

However, the pre-application advice did include a number of comments which would need to be addressed as part of any subsequent planning application. In particular consideration should be given to:

1. The use of the existing lightwell and flank facing windows was considered to adversely prejudice the future development potential of the properties at 33 and 37 Upper Wickham Lane.
2. The submitted details in relation to the provision of cycling parking spaces was limited. The proposal should meet the London Plan (2021) requirements of one space per unit for this type of development.
3. Further details should be provided in relation to the size and type of refuse provision and demonstrate that it will be safe and secure.
4. A fire safety strategy will be required in line with the London Plan 2021
5. A schedule of materials that relates well with the surrounding area and the details of the proposed green roof to facilitate biodiversity net-gain of the site should be included.

Accordingly, the scheme subject of this application has been revised to directly address these comments. Notably:

- The layout of the development has been altered by moving the staircase centrally within the floorplan to face the lightwell. This has ensured that no windows are now proposed to the flank wall facing 37 Upper Wickham Lane and only two windows are proposed to the lightwell on each floor; all projecting inwards.
- There is sufficient space for cycle parking for one space per unit located both within the internal residential cycle store and to the rear of the property within the applicants red line of ownership. It is considered the exact type and means of enclosure can suitably be controlled by condition.
- A Fire Safety Strategy has been provided by Fire Safety South East which complies with Policy D12 (A) of the London Plan (2021)
- A schedule of materials to be used for the development is outlined in detail within the Design and Access Statement which accompanies this submission. This includes further detail for the green roof.

## **Proposed Development**

The proposed development, for which consent sought, is for the upward extension of 35 Upper Wickham Lane to provide a four storey building containing 1no. 3 bed and 4no. 5 bed HMOs (Use Class C4). The existing two retail units on the ground floor of the property are to be retained and reorganised to provide 152m<sup>2</sup> of commercial space arranged in a single unit.

All of the proposed HMO rooms proposed are at least 12m<sup>2</sup> in area, in line with the relevant standards, and all benefit from an en-suite bathrooms and an elfin style kitchenette. In addition, all rooms will have access to a shared

kitchens throughout the building. All future and existing occupiers will thereby benefit from a high quality standard of living accommodation which meets and exceeds the Council’s HMO licencing standards.

The proposed upward extension creates a property which is four stories in height incorporating a flat roof. On the fourth floor the property is recessed from the principal and rear building line, incorporating a contrasting darker zinc cladding material to ensure it appears subservient to the host building and wider street scene. In addition, white render is applied to the existing retained walls up to the proposed third floor to enhance the aesthetic of the property as a whole. Full details of the proposed external materials used as part of the development are detailed in the Design and Access Statement provided by T2S Architecture.

Pedestrian access to the HMO accommodation will be taken from the rear of the property while commercial access is achieved from both the front and rear. The development does not provide off-street parking and is proposed as a car free development. Both cycle and refuse storage is provided internally to the rear of the ground floor of the building and within the rear courtyard of the property.

### Planning Policy Context

The statutory development plan for the application site comprises the London Plan (adopted in April 2021) and the Bexley Local Plan adopted in March 2023.

The key relevant policies include:

London Plan (2021)	Bexley Local Plan ( 2023)
GG2 – Making the Best Use of Land D4 – Delivering Good Design H2 – Small Sites D6 – Housing Quality and Standard	SP1 – Achieving Sustainable Development- the Spatial Strategy SP2 – Meeting Bexley’s Housing Requirements DP1 – Providing a Supply of Housing DP5 – Requirements for HMOs and Live/Work Units DP9 – Development Within Town Centres SP5 – Placemaking Through Good Design DP11 – Achieving High Quality Design DP14 – Development Affecting a Heritage Asset DP22 – Sustainable Transport DP23 – Parking Management DP24 – Impact of New Development on the Transport Network

### Matters at Issue

#### Principle of Development – Creation of HMO Bedrooms

The site is located within a ‘Sustainable Development Location’ which Policies SP01 and SP02 of the Bexley Local Plan identify as a location which will be the focus for the intensification of housing growth to meet housing needs.

The NPPF and the development plan also give substantial weight to the development of underutilised land and buildings, especially if this would help meet identified needs for housing. Alongside this, the London Plan has a presumption in favour of small housing developments.

The application site is therefore exactly the type of site envisaged in the Local Plan which should provide additional housing; being a small site in the District Centre of Welling. In this context, the proposal presents an important opportunity to deliver modern, purpose designed HMO rooms in a town centre location with very good access to public transport, shops and local services. It will deliver much needed additional residential units and fully utilises a highly sustainable site.

This application should also be seen in the context that Bexley has fallen consistently short of delivering the homes it requires within the last 3 years which has required Bexley to produce an action plan to boost housing delivery as set out within the latest Housing Delivery Test 2022. This, combined with the new London Plan's 54% increase in the Borough's 10-year housing target compared to previous London Plan target, means the delivery of homes within highly sustainable locations such as this will be required to ensure homes are delivered to meet Bexley's housing needs in the immediate short term.

DP5 of the Local Plan is specifically concerned with HMO's. It indicates that proposals for new HMO's will be supported (our emphasis) subject to:

- a) Demonstrating they will not have an adverse impact on the local area; and
- b) The appropriate quality of accommodation being proposed.

The proposals fully comply with this guidance. In particular:

- There is not a concentration of other HMO's either along this particular terrace or in the area generally. A street search on the Landlord Licence public register outlines that there are only thirteen known HMOs in the DA16 postcode.
- The 2no. tired, part vacant commercial ground floor units will be replaced with a more modern, attractive single unit which will improve the viability and vitality of Welling High Street.
- The upper floors will remain in a residential use, albeit a specialist residential use. The proposal does not involve the loss of any family sized dwellings and overall will increase the quantum of residential floorspace at the site.
- The location, being both sustainable and with excellent access to shops and services is ideally suited to this type of use and intensification.
- The units are of a good quality and standard with their own en-suites and kitchen facilities together with shared communal facilities. They are comparable to other recent HMO developments undertaken elsewhere in the Borough.

In short, the proposed development will make an important contribution to delivering additional residential accommodation within an established and sustainable neighbourhood where intensification is encouraged. The proposal represents an efficient use of the site and adds choice and affordability to the existing housing stock where there is a clear and pressing need. This position was agreed at the pre-application stage when officers concluded that the introduction of a new HMO in this area would not result in an over concentration of such uses and would not be detrimental to the housing quality of the area.

Subject to compliance with other policies of the Development Plan, the principle of residential development at this location is, therefore, considered to be acceptable.

## Design and Visual Impact

Policy D3 and D4 of the London Plan as well as Policy SP5 and DP11 of the Bexley Local Plan requires that the design of all new developments should enhance the quality of local places, including the physical context and local character.

The proposed building height is in keeping with the prevailing building heights along Upper Wickham Lane and the High Street generally which comprises an eclectic mix of 1 to 4 storey development. The proposals will not, therefore, compete or be in any way dominant or out of character with the surrounding building heights observed along Upper Wickham Lane.

The proposal should also be viewed in the context that immediate surrounding properties along Upper Wickham Lane have a varied and contrasting built form with long elongated side and rear extensions of varying depths, designs and mass. This lack of uniformity within the street scene ensures that the proposed development is in keeping with the character and appearance of the adjacent buildings and will thereby harmonise with the wider street context.

Furthermore, the scheme proposes a flat roof, which replicates the roof forms of properties located along Upper Wickham Lane. In addition, the property steps back on the fourth floor from the principal and rear elevations to ensure the proposed fourth floor is subservient in bulk, scale and mass to the host building and character of the surrounding building lines.

The proposed materials will also be of a high quality and complementary to the materials found in the surrounding built environment. Moreover, the proposed contemporary design will also harmonise with the adjoining redevelopment at 21-27 Upper Wickham Lane and add visual interest to the site. It is therefore considered that the proposal will result in a material betterment to the character and appearance of the site and area generally, particularly given it will enhance the existing building which is of poor construction and little or no architectural merit.

This view was expressed at the pre-application stage when it was noted that the proposed development would sit well within the surrounding urban environment in terms of scale and massing.

Overall, it is therefore considered that the application scheme is of a high-quality design which contributes positively to the local spatial character. The proposal thereby accords with London Plan Policies D3 and D4 and Policies SP5 and DP11 of the adopted Bexley Local Plan.

## Quality of Residential Accommodation

The proposed development will provide a high-quality living environment for the future occupiers of the proposed development.

The proposed rooms will be for occupation by 1 person only and are arranged in small cluster units on the 1<sup>st</sup> to 3<sup>rd</sup> floors. Each bedroom will benefit from an en-suite bathroom, separate Elfin Kitchen cooking facilities, a wardrobe and chest of drawers and appropriate storage space. Each room will also have access to a shared communal kitchen within each of the cluster units. All rooms are, therefore, good quality well designed HMO accommodation which meets current day HMO space standards.

Furthermore, all habitable rooms have good sized windows which are of regular shape. All windows will receive

direct sunlight and none will be directly impeded by adjacent properties. Given the orientation of the building and the number and size of windows proposed, we conclude that each of the proposed units will receive good levels of natural light to all habitable rooms.

In support of this application is a Daylight and Sunlight Report prepared by Right of Light Consulting which assess light to the individual rooms.

In conclusion the report found a high level of compliance with the BRE guidance. All rooms meet the sunlight criteria and whilst there are a limited number of rooms that do not fully meet the daylight criteria (4 out of 23), that is not unusual in an urban setting such as this.

In addition, the property is located within walking distance of two large public open spaces with both East Wickham Open Space and Danson Park, both located approximately 1km to the north and south of the site respectively.

The proposals will provide a good living environment for future occupiers of the building.

## **Highways / Transport**

The PTAL (Public Transport Accessibility Level) of the site is 4. This is considered to be “Good”.

The nearest bus stops of any significance are located next to the site and directly across the road. Here bus services 96, 89, 486 provide frequent Monday-Sunday services to surrounding local centres including Woolwich, Eltham, Bexleyheath and Greenwich.

Furthermore, Welling Train Station is located within easy walking distance of approximately 500m to the west of the site from which South-Eastern rail provides direct access into the centre of London (Charing Cross) every half an hour.

The site is also well located to a wide variety of local services, facilities and employment opportunities as the proposed development is in close proximity to a number of shops, the High Street and shopping centre of Welling Town Centre.

The proposed development would also be provided as ‘car-free’ which is advocated within the London Plan. Residents would not therefore be eligible for a resident’s or visitor’s parking permit and this can be secured by a planning condition or a Section 106 Agreement. As agreed with by the authority at pre-application stage. The proposals will therefore not have a perceptible impact on the functioning of the local highway network.

Overall, the proposed development provides an opportunity to provide additional residential development within a town centre location which has excellent accessibility to local facilities and amenities by non-car modes of travel. It is therefore considered that there are no transport or highways considerations warranting refusal of the proposal.

## **Amenity – Impact on Neighbouring Residents**

The proposed development has been carefully designed to respect the amenity of neighbouring residents. The proposal will not result in any direct window to window overlooking and maintains appropriate separation distances to the adjoining neighbours.

## **Refuse and Recycling Storage**

Separate refuse and recycling storage is located on the ground floor of the property. This is not located within



proximity to habitable rooms windows, is secure and is of a sufficient capacity for a development of this size.

### **Fire Safety**

Policy D12 (A) of the London Plan (2021) requires that all development must submit a planning fire safety strategy. The fire safety strategy should address the criteria outlined in Policy D12 (A).

In support of this application is a Fire Statement prepared by Fire Safety South East which explains the fire safety measures that have or will be employed in the development to protect occupants in the event of a fire. It responds directly to the requirements of Policy D12 of the London Plan.

### **Conclusions**


The proposals will meet a clear identified need for new residential development in London and Bexley whilst maximising the development of an underutilised, sustainability located brownfield site within an area identified for intensification.

The designs shows a site which is capable of absorbing an increase in building height, bulk, scale and mass, without harming the visual amenities of the surrounding area. Furthermore, the proposed development will provide a more modern, attractive and enhanced commercial unit which will enhance the site's and wider area's retail provision.

The development will also provide a high standard of residential accommodation and living standards for future occupiers and not give rise to unacceptable impacts on the residential amenity of adjoining properties.

In conclusion, the proposals are considered to comply with the policies of the Development Plan when taken as a whole as well as being in accordance with national planning guidance provided within NPPF. In addition, we consider that there are no material considerations which deem that the application should not be determined in accordance with the Development Plan. As such, in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, we consider that planning permission can be approved for the proposed development.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'R Birtles', with a long horizontal stroke extending to the right.

**Roger Birtles**

Director

Encs.



35 Upper Wickham Lane, Welling, DA18 3AD

Full Planning Application

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## Document 1

Pre-Application Advice

Development Management  
Place  
Civic Offices, 2 Watling Street,  
Bexleyheath, Kent, DA6 7AT  
Telephone 020 8303 7777

The person dealing with this matter is: Ankit Dhakal  
Direct Dial: 0203 045 3361  
Email: [Ankit.Dhakal@bexley.gov.uk](mailto:Ankit.Dhakal@bexley.gov.uk)

Our reference: 23/01345/PREAPP  
Date: 8 September 2023

Brightstar Ltd

C/o Simply Planning  
Nathan Halloran  
Third Floor Suite  
114-116 Colmore Row  
Birmingham  
West Midlands B3 3BD

## BY EMAIL

Dear Mr Nathan Halloran

**Re: Formation of second and third floors to provide a mixed use, 4 storey building, comprising a 26 bed House in Multiple Occupation (HMO) (Use Class Sui Generis) with commercial space (Class E) retained on the ground floor.  
35 Upper Wickham Lane, Welling, Kent, DA16 3AB**

## INTRODUCTION

Thank you for engaging with the London Borough of Bexley's pre-application service. We hope you have found the process useful in developing your proposals. I have set out below my comments on the scheme following our meeting on 28<sup>th</sup> July 2023.

## PROPOSAL

Pre-application advice is sought for proposed two storey upward extension to provide a mixed use, 4-storey building, comprising of 6 units with 26-bed House in Multiple Occupation (HMO) (Use Class Sui Generis) with commercial space (Use Class E) retained on the ground floor.

## RELEVANT PLANNING HISTORY

14/00296/FUL Change of use to an office/training facility. *Permission granted on 17 Apr 2014*

11/00560/FUL Conversion of first floor offices to 2 x 2-bedroom flats. *Permission granted on 07 Jun 2011*

## **RELEVANT PLANNING CONSIDERATIONS**

### The Development Plan

The adopted Development Plan for the London Borough of Bexley comprises; the Bexley Local Plan (2023) and the London Plan (2021).

The Development Plan for the area, which includes the Bexley Local Plan and the Mayor's London Plan, should be read in its entirety. Planning guidance produced by the Government, the Mayor of London, and by the Council expands on Development Plan policies and has material weight when taking planning decisions.

The London Plan, as the spatial development strategy for London, provides the strategic framework. It does not however preclude boroughs from bringing forward policies relevant to their areas where locally specific circumstances and evidence suggests this would not undermine the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan. The Local Plan does this. It is also silent where the London Plan policy does not require a local approach. The London Plan 2021 plan period runs from 2019 to 2041, and the Local Plan to 2038. Longer term London Plan objectives may fall beyond the timeframe of the Local Plan although the key objective of sustainable development underpins both documents. The Local Plan contains strategic, non-strategic and site allocation (for residential and residential-led mixed-use development) policies along with supporting text.

### Other material considerations

The National Planning Policy Framework (2021) acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications. At the heart of the NPPF is a presumption in favour of sustainable development. The document forms a key and material consideration in the determination of any planning permission.

## **PLANNING ASSESSMENT**

The main considerations include Principle of development; Design Considerations; Quality of Residential Accommodation; Highways; Impact on neighbouring amenity; Sustainability and Environmental Considerations Requirements & Designing Out Crime.

### Principle of Development

Amendments to legislation in 2010(3) allowed changes of use from single dwelling houses (Use Class C3) to Houses in Multiple Occupation (Use Class C4) to take place

without the need for planning permission. However, in September 2017, the Council confirmed an Article 4 Direction covering the whole borough withdrawing permitted development rights for this change of use.

Policy DP5 of the Bexley Local Plan states that Houses of Multiple Occupation (HMO) are houses occupied by members of more than one household who share basic amenities such as a kitchen or bathroom. This policy advises that when assessing the impact and quality of the proposed HMO on the local area, issues such as highway safety, residential amenity of future and neighbouring occupiers, refuse arrangements, Bexley's HMO Living and minimum space standards and the Rent it Right Scheme will be considered.

As the proposal would see loss of existing housing stock Policy DP6 should also be assessed. Policy DP6 asserts that development resulting in the net loss of all or part of a dwelling will generally be resisted, except where it would replace a ground floor residential unit within a town centre with a ground floor main town centre use; it would replace significantly substandard units with fewer, high-quality units; or the loss would allow for the provision of a community facility that is suitable for residential areas, subject to no significant adverse impacts on neighbouring properties.

Some of the rooms within the flats as existing appear to be substandard and due to its location on a busy road with no private amenity space, it is not considered to be suitable for a family sized dwelling unit. The use of HMOs on these sites would be appropriate considering its town centre location with very good access to the nearby transport links such as buses and train station were. The occupants of the HMOs play a particularly vital role in supporting labour market flexibility (especially for new entrants), and in reducing pressure on publicly provided affordable housing. It is also noted that HMOs are a strategically important housing resource, providing flexible and relatively affordable accommodation through the private market. This view is further asserted in the 'Mayors Housing SPG' (2016).

Additionally, the use of HMO would not lead to a significant overdevelopment of the property in terms of potential occupants, when compared with the number of residents that could theoretically reside at the premises once completed. The pre-application is for a maximum of five persons per unit and a planning condition could be used to restrict the number of occupants to five persons.

Furthermore, a street name search of the application site on the Landlord licence public register shows there are thirteen known HMOs in the DA16 postcode. Considering the number of HMOs in the DA16 postcode and whilst the proximity of the nearest existing HMO is acknowledged, it is considered that the introduction of a new HMO in this area would not result in an over concentration of the use and therefore would not be detrimental to the housing character or the area. The proposal would therefore be in conformity with Policy DP5 of the Bexley Plan.

#### Design Considerations, including Impact on character and appearance of the area.

Policy D3 and D4 of the London Plan (2021) as well as Policy SP5 and DP11 states that the design of all new developments should enhance the quality of local places and that

this should consider several matters, including the physical context and local character.

The application site is on the edge of Welling District Centre where the buildings are mixed use properties, 1-4 storeys in height and there is a variation in building scales along the length of the road. Commercial units at ground floor with residential units above is the predominant pattern of development along the District Centre. Springfield Road is a quieter residential road predominantly comprising of two-storey terrace dwellings. Within the context of the surrounding area, the application site is a two storey mid-terraced property with a flat roof of low architectural merit. The property is occupied on the ground floor by two retail units including a training centre and vacant commercial unit accessed from Upper Wickham Lane and 2xtwo bed self-contained flats located on the first floor accessed from the rear via an access road. Given its relationship with No.37, the rear flank wall of the application site is visible from Springfield Road.

The proposal seeks to establish additional floors of residential HMO units above the existing building. The overall height resulting from the extension is considered compatible with the scale of development along Upper Wickham Lane and the High Street. The proposal for a setback top floor is considered to reference existing development to the south along the road and assists with achieving a subordinate appearance and footprint relative to the main building.

The existing building is currently visible within the setting of a locally listed building when viewed along Road. However, it is considered that the proposal would be comparable in height with other buildings and whilst the extension would increase the prominence of the building, the proposed with recessed design, which should have contrasting materials and paler colour, should all be a mitigating factor. The proposal could cause some harm to the setting of the locally listed buildings near the site; however, this is likely to be considered to amount to less than substantial harm. This will be fully considered upon a formal submission and a full set of drawings. Given the varied scale of built form along the road, which is visible in long views, Officers consider that the proposal would not cause significant harm to the character and significance of the wider area but would be an overdevelopment and result in unacceptable relationships with the adjoining property.

However, upon further review of the proposed scheme, LPA views the resultant relationship at roof level with the adjoining properties to be discordant and dominant in an immediate setting. The use of the existing lightwell and flank facing windows to provide glazed openings for the rooms would adversely prejudice any future development / redevelopment of both the adjoining sites at 33 and 37 Upper Wickham Lane. Furthermore, considering the disparity in height and need for flank facing windows, the proposal can be viewed as an overdevelopment of the site due to the number of HMO bedrooms the application proposes on a constrained site.

#### Quality of Residential Accommodation

The proposal would create 6 small HMOs spread across three floors in following formation:

- First floor will have 2 units comprising of 5 HMO rooms (Residential Unit 1.01) and 4 HMO rooms (Residential Unit 1.02).
- Second floor will have 2 units comprising of 5 HMO rooms (Residential Unit 2.01) and 4 HMO rooms (Residential Unit 2.02).
- Third floor will have 2 units comprising of 4 HMO rooms (Residential Unit 3.01) and 4 HMO rooms (Residential Unit 3.02).

The proposed HMO bedsit bedrooms would provide accommodation for 1 person per unit. The Council's General Property Standards for Property Licensing requires 9sqm for bedsit where shared kitchen facilities are provided in a separate room. Furthermore, the kitchen should have floor space of at least 5.5sqm for a unit with five occupants. The applicant has stated each bedroom will benefit from an en-suite bathroom, separate cooking facilities, a wardrobe and chest of drawer storage space and is 10.2sqm. Each HMO unit is also provided with a separate shared communal kitchen which are circa 6.7sqm. The proposal appears to comply with these requirements, however a further assessment from the Council's Property Licensing Officers would be required to determine the proposal is acceptable for proposed HMO use. Additionally, the property is located within walking distance of two large public open spaces with both East Wickham Open Space and Danson Park, both located approximately 1km to the north and south of the site, respectively. The proposals will provide a good living environment for future occupiers of the building.

Notwithstanding the above, concerns are raised regarding the units served solely by flank facing window facing Springfield Road and the windows served by the lightwell which would be in close proximity to the boundary with 33 Upper Wickham Lane. By positioning the windows on this wall and lightwell the proposal would prejudice the future development of the adjacent sites. 37 Upper Wickham Lane which sits on a prominent junction of Upper Wickham Lane and a Springfield Road within the Town Centre. It would not be acceptable to condition these windows to be obscure glazed and fixed shut noting they are the sole window serving the whole of a unit or serve communal space. A revised layout would be required to address the concern raised; this may result in alteration of internal floorplans and the number of units to each floor.

Policy D7 of the London Plan outline that new housing must meet building regulation M4(2) 'accessible & adaptable dwellings. Policy D5 requires developments to be designed to be convenient and welcoming with no disabling barriers which can be entered, used, and exited safely, easily and with dignity for all. This is also reflected in Policy SP5 of the Bexley Plan.

The existing building does not have provision for a lift and as such the minimum requirements for step free access would not be achieved. As the proposal is for an extension rather than a new build development, the lesser requirements of Approved Document M4(1) would be sought as part of any approval.

#### Highways

The site is within a PTAL of 4 and therefore has good connectivity to public transport, with 6 bus routes and Welling railway station within the specified walking distances for PTAL calculation. The proposals do not include any off-street car parking which would be acceptable for residential accommodation in this location close to local amenities and services and good links to public transport. Notwithstanding this, the proposed development does have the potential for the future occupiers to be owners of vehicles. Given the fact that the application site is also located within the Welling Town Centre CPZ a condition would be recommended to prevent future occupiers from obtaining a parking permit.

The submitted details in relation to provision of cycling space is limited. This should be included with any application submitted to meet the relevant London Plan (2021) requirements of one space per unit for this development.

The submitted plans show that refuse provisions would be provided on site on the ground floor. No details have been provided in relation to whether the size is appropriate for a development of this size or how safe and secure these provisions are. This should be addressed prior to any future submission.

#### Impact on Neighbours' Residential Amenity

In view of the position of the proposed development it is not considered that the proposed development would affect the amenities of the occupiers of the adjoining properties in terms of loss of light or overbearing impact. The proposed development is not considered to raise any issues in terms of increased overlooking and/or privacy.

Notwithstanding the above, Officers is mindful of the impact the proposal will have on the future development of the adjacent sites as it would likely have a negative impact on the future occupants/ use of the neighbouring properties.

#### Sustainability and Environmental Considerations Requirements

##### *Energy and sustainability*

New development is required to incorporate design features that help deliver radical reductions in greenhouse gas emissions, particularly CO<sub>2</sub> emissions, and thus help mitigate climate change impacts. Local Plan Policy DP30 states that minor development proposals should aim to achieve net zero carbon: reducing greenhouse gas emissions in operation and minimising annual and peak energy demand in accordance with the London Plan energy hierarchy. The Council expects that new homes, such as that proposed, be designed to achieve: BREEAM Home Quality Mark (HQM), or Passivhaus, or other appropriate sustainability measures.

Additionally, with regards to water efficiency, Policy DP30 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. It is advised that the applicants should submit information regarding compliance with this policy.



### *Biodiversity*

Policy DP20 of the Local Plan (2023) seeks the protection and enhancement of biodiversity. The policy states that proposals should demonstrate that biodiversity enhancement measures and where appropriate mitigation measures have been incorporated within the design, layout and materials used in the built structure and landscaping. Policy G6 of the London Plan (2021) sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.

In this instance the submitted information indicates a green roof on the site with recessed fourth floor. The application site would provide a great opportunity to enhance biodiversity net gain and provide a positive change to the surrounding area. The applicant should make the most out of this by demonstrating the site's ability to have biodiversity net gain should an application be made.

### *Drainage*

No drainage details have been submitted with this proposal and accordingly, should planning permission be sought, full drainage details would need to be provided in accordance with Policy SI13 of the London Plan (2021).

### *Fire Safety*

Your attention is drawn to Policy D12 of the London Plan which requires that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. You should be mindful of the criteria set out in this policy.

### *Designing Out Crime*

Proposals should ensure that developments create places that are safe, inclusive, and accessible for existing and future users. The Boroughs adopted Design for Living (2016) SPD sets out that it is important for housing design schemes to embrace designing-out-crime principles including defensible space, natural surveillance, visibility, lighting, and other security measures. Good design helps prevent crime, and early liaison with the Local Crime Prevention Officer is recommended.

It is recommended that you contact Mark Headley of the Metropolitan Police Service ([Mark.A.P.Headley@met.pnn.police.uk](mailto:Mark.A.P.Headley@met.pnn.police.uk) / 0208 284 8889) directly to discuss secured by design principles for this development.

### Planning Obligations and CIL

Bexley's Community Infrastructure Levy (CIL) came into force on 30th April 2015. CIL is a system of planning charges for the funding of infrastructure to help make new development sustainable. It has replaced the previous system of Section 106 planning obligations except for securing site mitigation measures and affordable housing provision.

Bexley's CIL charge for the proposed development in this location would be £40 per square metre of net additional floorspace (subject to indexation). Further details of Bexley's CIL can be found on the Council's website by clicking [here](#).

In addition to the above, the proposal would be liable for the Mayoral CIL, which is charged at £25 per square metre (plus indexation) of net additional floorspace. CIL is payable on commencement of development.

#### Pre-commencement conditions

New Regulations require pre-commencement conditions to be agreed with the applicant/agent. If that agreement is not forthcoming it may result in the planning permission being refused. As part of a planning application, the Planning Authority will write to requesting agreement to such conditions. It is in your/your client's interests to respond promptly to that request, and it is good practice if pre-commencement conditions can be agreed as early as possible.

#### List of Documentation to be submitted with application

The link below details the requirements for valid submission of different types of planning applications to the London Borough of Bexley.

<https://www.bexley.gov.uk/services/planning-and-building-control/planning/make-planning-application>

The key documents to be submitted will include the following. This is not necessarily an exhaustive list; please refer to national and local validation requirements as per the above link.

- Completed Application Form.
- Signed Ownership and Agricultural Holdings Certificate.
- Application fee.
- Location plan.
- Site / block plan.
- Floor plans (including ground floor retail).
- Roof Plans.
- Sections and site levels.
- Elevations.
- Planning Statement.
- Design and Access Statement.
- Sustainable Urban Drainage Strategy.
- Ecology Report.

#### Street Name and Numbering

Should planning permission be granted, its implementation will require the assignment of a postal number(s). The Council, as the Local Street Naming and Numbering (SN&N) Authority, are responsible for approving new road names, assigning postal numbers, and entering the information on the National Land & Property Gazetteer, a national database of address information.

A SN&N application should be submitted to the Council at the earliest opportunity once a date for commencement is decided, to ensure that any new number(s) is/are assigned before the development is occupied. A fee will be required for this service, see Bexley Council's website for details

(<https://www.bexley.gov.uk/index.php/services/streets-and-roads/street-naming-and-numbering>).

Please note that the use of an address without the sanction of the Council is unlawful and may be subject to legal proceedings.

## **CONCLUSION**

Overall, the proposed formation of second and third floors to provide a mixed use, four storey building, comprising of 26 bed House in Multiple Occupation (HMO) (Use Class Sui Generis) with commercial space (Class E) retained on the ground floor is likely to have some impact on the neighbouring as well as future residents of the application site. If the application was forthcoming, applicants are advised to reduce the number of bedrooms or alter the schedule of accommodation to include some self-contained units. The use of lightwell and the windows on the flank elevation facing Springfield Road would be prejudicial to the future development of the adjoining sites therefore the applicants ought to be mindful of this matter when considering submitting the application. Furthermore, following details such as schedule of materials that relates well with the surrounding area and the details of the proposed green roof to facilitate biodiversity net-gain of the site would need further consideration upon additional information. The amenity of the future occupiers should be ensured through the relevant standard of accommodation for HMOs by amending the internal layout to ensure no habitable windows along the flank wall.

This pre-application advice follows an initial officer assessment of the information you have provided. Every formal application is subject to a statutory assessment process, and it is only then that a full assessment of all the material planning considerations can be made in the context of relevant development plan policies. Some important considerations may only arise or become apparent during this formal process, which includes consultation with residents and other third parties affected by the development. This officer advice is therefore given for your general guidance in the preparation of a future planning application or proposal. The advice does not prejudice the Council's consideration or decision on any future application that may be submitted.

Yours sincerely,

Ankit Dhakal  
Principal Planning Officer  
Planning Department – Development Management  
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