



## Planning, Design & Access Statement

New Dwelling  
AT  
198 Park Crescent,  
Erith DA8 3ED

Reference:  
198PC-2385

Date:  
15 March 2024

## **1. Introduction**

- a. This Planning, Design & Access Statement has been prepared by Just Planning to support a full planning application for the erection of a single storey dwelling on land to the rear of 198 Park Crescent, in Erith.
- b. Following a description of the site and surrounding area, the report will consider the planning history, provide an overview of relevant planning policy and outline the case for the proposal.
- c. The proposal provides a high quality new dwelling in a sustainable location while making more effective use of existing land and the applicant respectfully requests that planning permission be granted.

## 2. Site Description

- a. The application site is land to the rear of the 198 Park Crescent, a two-storey, semi-detached house located on the junction of Park Crescent and Lesney Park. It has an unusually long rear garden, extending to approximately 50m, with a frontage on Lesney Park. There is a tall, brick wall along the Lesney Park boundary.
- b. The adjoining semi-detached neighbour, number 200 Park Crescent, is similar to number 198 and has a matching, long rear garden. To the rear of the site are houses set perpendicular to number 198 and fronting Lesney Park. The first of these, number 91, is detached and has an A-shape roof design.
- c. The wider surrounding area is residential and suburban in character. Many of the houses have been extended and altered in various ways, contributing to a diverse streetscene.
- d. The application site has a public transport accessibility level (PTAL) of 1b. It is sustainably located in a built-up area close to Erith railway station.
- e. The application building is not listed and does not lie within a designated conservation area.

### 3. Relevant Planning History & Application Proposal

- a. On 15 November 2023, the council provided pre-application advice on a proposal for a bungalow with rooms in the roofspace to be located in the rear garden of the application site (reference: 23/01211/PREAPP).
- b. In the pre-application response, the council commented that:
  - *The site is located in a primarily residential area and the proposal is acceptable in principle;*
  - *The close proximity of the dwelling to the highway raises concerns that it will look out of place;*
  - *The 6.5m height of the building, with roofs in the roof and a gable-ended roof design will mean that the house appears excessively prominent in the streetscene;*
  - *The design of the house is excessively complicated, with a mix of gable and hipped roof designs;*
  - *The proposed rear windows would have limited outlook (because they look onto the boundary fence);*
  - *The house would otherwise represent a high quality of internal living accommodation, would provide sufficient garden space and would not cause undue harm to neighbours and would not have any adverse highways impacts; and,*
  - *An arboricultural survey should be submitted to accompany any planning application.*
- c. The applicant has revised the application proposal in light of the case officer's comments. The roofs have been removed from the roofspace, so that the house is a single storey dwelling only. The height is reduced so that it has an eaves height of 2.9m and a maximum height of 6.4m. The roof is altered to a more conventional roof design. The rear windows are omitted. An arboricultural survey is submitted to accompany the planning application.
- d. The proposal is for a detached bungalow located at the rear of the site. It is in two parts, with one part stepped back from the other. It is set back 1m from the boundary with the street and also set off the boundary with number 200. It has gardens to either side of the main house and off-street parking for one car.

- e. The house is laid out with an open-plan kitchen/dining/reception room, a double bedroom, a study, a bathroom and dedicated storage. The proposed block plan makes provision for the storage of bicycles, refuse and recycling.

#### 4. Planning Policy

- a. The development plan for the area comprises the Bexley Local Plan, adopted in 2023, and the London Plan, adopted in 2021.
- b. Policy SP2 sets the council a target of 6,165 new dwellings over the period 2030 to 2038.
- c. Part 4(c) of the policy encourages the 'sensitive residential intensification' within the borough's Sustainable Development Locations. Intensification is supported outside these locations as long as they meet the requirements of part 4 of policy SP1, which states that:

*"Development proposals outside of these areas will be supported where they fully demonstrate compliance with all relevant Development Plan policies"*

- d. According to part 5 of policy SP2:

*"The Council recognises that the London Plan sets a significant proportion of Bexley's housing requirement to be met through the development of sites smaller than 0.25 hectares in size. Therefore, the Council will encourage proposals for appropriate development of small sites within the borough's identified Sustainable Development Locations, and permit them outside of these locations subject to part 4 of policy SP1."*

- e. Paragraph 2.20 of the supporting text states that:

*"Ensuring a supply of appropriate sustainably located housing is possibly the most important development need that should be addressed in a local plan, according to the Government in its presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF) and planning practice guidance."*

- f. Policy DP1 requires that new housing:

- a) *be well designed, appropriate for the area, high quality, sustainable and take account of the impacts of cumulative development, including on the health and wellbeing of the borough's residents;*
- b) *make the most effective and efficient use of land, seeking to achieve higher densities in the most accessible locations;*

- c) *achieve relevant London Plan space, accessibility, environmental, and housing amenity standards, having regard to published guidance; and*
- d) *encourage mixed communities through 'tenure blind' architecture.*
- g. Policy DP2 relates to backland and infill sites and requires that *"the development capacity of the site is optimised"* and that *"the development provides well-designed housing with a high standard of amenity that makes a positive contribution to the area"*.
- h. The policy goes on to say that development on garden land must provide adequate and safe access, preserve neighbours' living conditions, retain distinctive landscape and nature conservation features and provide both new and existing dwellings with adequate amenity space.
- i. Policy SP5 requires good design in all new development. It states that:
  - "Design should respect the existing character and context but need not be constrained by what already exists; local character evolves over time."*
- j. According to policy DP11:
  - "Development proposals within a Primarily Residential Area, as defined on the Policies Map, must seek to protect or enhance the area's character and its amenities"*
- k. The policy goes on to say that all development proposals for new buildings must take account of local character and be appropriate in terms of their *"layout, height, scale and massing, façade treatment, and materials"*. They should make a positive contribution to the streetscene.
- l. The policy also requires that developments provide good quality privacy, outlook, natural daylight and general amenity. There should be no harm to neighbours in terms of *"noise, odour, vibration and light spill or other disturbances"*.
- m. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The 2021 London Plan sets significantly more homes to be provided within the outer London Boroughs (including Bexley) than the previous 2016 London Plan.
- n. Policies D1 and D2 seek a high quality of design in all new development.

- o. Policy D3 of the London Plan seeks to *"make the best use of land by following a design-led approach that optimises the capacity of sites"*. Part C of the policy states that the *"incremental densification of sites should be actively encouraged"*. The policy goes on to state that development should represent a high quality of design and respect and reflect the character of the area. It should also protect the residential amenity of close neighbours.
- p. Policy D6 requires that all new dwellings provide a high quality of living accommodation. It sets out minimum gross internal areas (GIAs) and requires that dwellings have a regular layout, enjoy good quality light and outlook, have storage and have access to outside space.
- q. Policy GG2 promotes the development of brownfield land and the more intensive use of land.
- r. Policy GG4 requires that planning authorities *"ensure that more homes are delivered"*.
- s. Policy H1 sets a London-wide target to provide an annual average of 52,287 net homes across London. The Plan sets the London Borough of Bexley an annual target of 685 additional homes per year to contribute towards the target.
- t. Policy H2 encourages the optimisation of small sites to provide new homes. It sets a presumption in favour of small housing developments. According to the policy:

*"Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:*

- 1. significantly increase the contribution of small sites to meeting London's housing needs*
- 2. diversify the sources, locations, type and mix of housing supply*
- 3. support small and medium-sized housebuilders*
- 4. support those wishing to bring forward custom, self-build and community-led housing."*

- u. The policy goes on to say that the boroughs should:

*"recognise in their Development Plans that local character evolves over time and will need to change in*



*appropriate locations to accommodate additional housing on small sites"*

- v. Table 4.2 of the plan sets the London Borough of Bexley to deliver 305 homes per year through the development of small sites.
  - w. Policy T1 sets a Strategic approach to transport, stating that development proposals should facilitate the Mayoral strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041.
  - x. Policy T5 requires that development proposals help remove barriers to cycling through the provision of appropriate levels of cycle parking, which should be fit for purpose, secure and well located. Development should provide cycle parking at least in accordance with the minimum standards within the plan.
  - y. Policy T6 states that car parking should be restricted in line with levels of existing and future public transport and connectivity. Policy T6.1 defines maximum parking standards.
  - z. The revised National Planning Policy Framework (NPPF), adopted on 19 December 2023, sets out the government's national planning policies and how these policies should be applied. It identifies a presumption in favour of sustainable development. Development is sustainable when it meets the economic, social and environmental needs of a community.
- aa. According to paragraph 38:

*"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."*

- bb. Chapter 5 sets out the government's objective *"of significantly boosting the supply of homes"*.

- cc. According to paragraph 70:

*"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."*

- dd. Part (c) states that councils should:

*"support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes"*

- ee. Chapter 11 encourages developers and local planning authorities to *"make effective use of land"*. Part (d) of paragraph 124 promotes *"the development of under-utilised land and buildings"*.
- ff. Chapter 12 requires good design. Paragraph 131 describes the *"creation of high quality, beautiful and sustainable buildings and places"* as *"fundamental to what the planning and development process should achieve"*.
- gg. Paragraph 129 requires that densities be maximised, to *"ensure that developments make optimal use of the potential of each site"*.
- hh. According to paragraph 135, developments must *"function well add to the overall quality of the area"*, be *"visually attractive as a result of good architecture"*, be *"sympathetic to local character and history, including the surrounding built environment"* and provide *"a high standard of amenity for existing and future users"*.

## 5. Assessment

### Principle of Development

- a. The NPPF and local policies emphasise the need to deliver high-quality new housing, ideally on existing brownfield sites in sustainable urban areas with access to transport links and local shopping facilities. The London Plan places a new emphasis on delivering new housing through smaller sites.
- b. In the pre-application response, the case officer agreed that the proposal was acceptable in principle, noting the council's demanding housing target and its support for windfall and infill development, subject to the detailed policies set out in the Local Plan.

### Design & Appearance

- c. Policies SP5 and DP11 require a high quality of design in all new development, underpinned by policies D1 and D2 of the London Plan and the design aspirations of the NPPF.
- d. The pre-application response expressed concern about the height of the proposal and its roof design. The current proposal rationalises the design, reducing its height and also reducing its bulk and massing by proposing a sympathetic, hipped roof form. The rooms in the roof are removed.
- e. With its revised design, the bungalow will make a positive contribution to the streetscene. It is modest in terms of its overall size and scale and will be an unobtrusive presence. The stepped design creates visual interest, and the house will have a balanced and harmonious appearance.
- f. The house will also integrate comfortably with an area that is diverse in character and appearance. The closest neighbour to the rear is a detached house with a distinctive, A-frame design, as shown in the image in figure 1, below.



*Figure 1: Image of the neighbouring property at 91 Lesley Park.*

- g. Beyond number 91 are semi-detached houses of a different design. The houses opposite, which are tall, red bricked houses, also have a different design. The wider area has houses with a variety of other architectural designs. The application proposal will fit in comfortably with the surrounding pattern of development.

#### *Amenity of Neighbouring Residential Occupiers*

- h. Policy DP11 of the Local Plan seeks to protect neighbours from the adverse impacts of new development.
- i. The pre-application response concluded that there was no likely impact on neighbours. The proposal is set well away from the closest neighbour to either side. Its low eaves height ensures that there is no unacceptable harm to the rear garden at the neighbouring property at number 200.

#### *Quality of Accommodation*

- j. The proposal exceeds the minimum gross internal area of 50sqm set out in policy D6 of the London Plan for one bedroom, two person flats. The new house also meets the following standards:
- *The plans show a dedicated storage area;*
  - *The double bedroom is at least 2.75m wide and has a floor area of at least 11.5sqm;*

- *The floor to ceiling height is 2.5m or greater for at least 75% of the GIA.*
- k. The new house is dual-aspect and all habitable rooms have windows and have good light, outlook and ventilation. There is direct access to large, private and regularly shaped gardens. The existing house retains a large rear garden.

#### Highways & Parking

- l. The site has a PTAL rating of 1b and is located close to Erith railway station.
- m. The proposal provides a new crossover with one off-street parking space. This complies with the single space per dwelling standard set out in policy T6.1 of the London Plan. In the pre-application response, the council did not raise any concerns about the parking provision and did not expect any harm in terms of highway safety.

#### Trees

- n. The application is accompanied by Arboricultural Impact Assessment and Method Statement, which concludes that there will be no harm to any trees as a result of the proposal.

#### Cycle Parking

- o. The submitted plans show both the new house being provided with secure parking for two bicycles.

#### Refuse & Recycling

- p. The plans make provision for the storage of refuse and recycling.



## 6. Conclusions

- a. The NPPF and local policies seek to make the best use of existing residential sites in sustainable locations. The London Plan sets a demanding target for the residential development of small sites.
- b. In its pre-application response, the council expressed support for the principle of development, the quality of accommodation provided, its impact on neighbours and its impact in terms of highways and parking.
- c. The applicant has followed the case officer's advice by reducing the height of the new dwelling, omitting the rooms in the roof, altering the roof design to a hipped roof and omitting rear-facing windows with poor outlook. A tree report is also provided in respect of trees.
- d. The house is modest in size and scale and conventional in design and appearance. It will not be a prominent presence on the streetscene and will not appear incongruous or out of place. It will enhance, rather than harm, the streetscene.
- e. For these reasons, the applicant contends that the proposal represents sustainable development and respectfully requests that planning permission be granted.



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