Rule 6 Party Status

Statement of Evidence of Character & Appearance, Height, Bulk & Scale

Site: 2, 4, 6 & 8 Danson Road, Bexleyheath, Kent DA6 8HB

Proposal;

Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70-bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space.

PINS ref; APP/D5120/22/3293225

L. B. of Bexley ref; 19/03072/FULM

Dated 22nd November 2022

by; Leslie Osborn   ✉: L_Osborn@sky.com

1. Introduction

1.1. This Statement sets out the Rule 6 Party evidence regarding character and appearance, height, bulk and scale with the proposed nursing home development, relating to the appeal against the Council's refusal of planning application ref: 19/03072/FULM for proposals at 2-8 Danson Road, Bexleyheath, involving:

Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70 bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space.

1.2. The Statement of Evidence of Effect on Character & Appearance, Height, Bulk & Scale is structured as follows:

- Section 2 – First Reason for Refusal
- Section 3 – The London Plan
- Section 4 – National Planning Policy Framework (2021)
- Section 5 – This Planning Application
- Section 6 – Bulk and Appearance

2. First Reason for Refusal

2.1. There are 6 reasons for Refusal this document deals with the first of those reasons

2.2. Reason 1

'The proposed development by reason of layout, height, bulk and scale would result in a form and scale of development which would be harmful to the character and appearance of the area, contrary to policies D1, D3 and D4 of the London Plan (2021), policies CS01 and CS03 of the Bexley Core Strategy (2012) saved polies ENV39 and H3 of the Bexley Council Unitary Development Plan (2004) and Paragraph 130 and 134 of the National Planning Policy Framework (2021)'

3. The London Plan

3.1. I refer you to the; **London Plan 2021** Policy D1 London's form, character and capacity for growth:

Defining an area's character to understand its capacity for growth

> A. *Boroughs should undertake area assessments to define the characteristics, qualities and values of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:*

1) *Demographic make-up and socio-economic data (such as Indices of multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)*
2) *Housing types and tenure*
3) *Urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)*
4) *Existing and planned transport networks (particularly walking and cycling networks) and public transport connectivity*
5) *Air quality and noise levels*
6) *Open space networks, green infrastructure, and water bodies*
7) *Historical evolution and heritage assets (including an assessment of their significance and contribution to local character*
8) *Topography and hydrology*
9) *Land availability*
10) *Existing and emerging Development Plan designations*
11) *Land uses*
12) *Views and landmarks*

Planning for growth

B   *in preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:*

> 1) *Using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan; and*

> 2) *Assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; and*

3) *Following the design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.*

3.1.1 *This plan provides a policy framework for delivering Good Growth through good design. Part A of this policy sets out requirements for assessing an area's characteristics and Part B sets out the steps for using this information to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that responsive to the site's context and supporting infrastructure.*

3.1.2 ***Understanding the existing character and context*** *of individual areas is essential in determining how different places may best develop in the future. An evaluation of the current characteristics of a place, how its past, cultural, physical and environmental influences have shaped it and what the potential opportunities are for it to change will help inform an understanding of an area's capacity for growth and is crucial for ensuring that growth and development is inclusive.*

3.1.3 *it is important to understand **how place are perceived, experienced and valued**. Those involued in commissioning or undertaking area assessments should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work.*

3.1.4 ***Areas assessments*** *should be used to identify the areas that are appropriate for extensive, moderate, or limited growth to accommodate borough-wide growth requirements. This analysis should form the foundation of Development Plan preparation and area-based strategies. This process will be fundamental to inform decision making on how places should develop, speeding up the Development Plan process and bringing about better-quality development. It will also help speed up planning decision making by providing an easily accessible knowledge-base about an area that is integrated in Development Plan policies.*

4. National Planning Policy Framework (2021)

4.1. I refer you to the National Planning Policy Framework (2021):

Paragraph 130

Planning policies and decisions should ensure that developments:

a) *Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

b) *Are visually attractive as aa result of good architecture, layout and appropriate and effective landscaping;*

c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix development (including green and other public space) and support local facilities and transport networks; and*

f) *create places that are safe, inclusive and accessible and prompt health and wellbeing, with high standard of amenity for existing and future users, and where crime and disorder, and fear of crime, do not undermine the quality of life or community cohesion and resilience.*

Paragraph 134

Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to;

a) *development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*

b) *outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an*

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area, so long as they fit in with the overall form and layout of their surroundings.

5.   This Planning Application

6.1.   With reference to the of the above legislative guidance, I am amazed the application got through to the planning committee, especially with its recommendation for approval by council officers.

6.2.   I question, whether the Local Authority Planning department, carried out the relevant due diligence on this application.

6.   Bulk and Appearance

7.1.   The existing properties are established two storey semi-detached houses, well accepted, and most desirable, large residential properties within the local community.

7.2.   The four properties are well designed, and constructed, in two storey traditional brickwork, under 35° pitched, plain tiled roofs, that marry exceptionally well within the street scene of Danson Road. They sit very nicely in their environment.

7.3.   All four properties conform to their "use class order C3", single family dwellinghouses.

7.4.   They are set back from the road carriageway, sufficiently to provide equally balanced front gardens, giving a comfortable environment to their community.

7.5.   The front gardens are nicely balanced, to provide adequate amenity areas, and driveway space, for parking of their private vehicles.

7.6.   Their rear gardens are equally balanced to accommodate for both leisure, and pleasure activities in gardening and landscaping for their occupants.

7.7.   To demolish such desirable properties is totally against policies set out in the London Plan (2021), as described above, and to propose to replace such properties with a large property of an institutional type and usage in a prominent residential area, with an overpowering bulk, its height and mass, would totally be out of character with the local community and the area.

7.8.   The area would lose the comfortable characteristics that make it most desirable.

7.9.   The proposed change in density also comes into question. The existing properties (whilst the density is not an accountable form), have on average 6 to 7 habitable rooms per house.

7.10.   To demolish four large properties with a density of approximately 28 habitable rooms for the site and replace them with a structure in excess of 80 habitable rooms would result in massive over development of the site.

7.11.   As is the site coverage. The existing properties cover 27% of the site, whereas the proposed development covers 85% of the site. Again, this points massive overdevelopment.

7.12.   In light of the points above, the Inspector is respectfully asked to dismiss this appeal.

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