

Amos, James

From: Collinson, Joe
Sent: 04 February 2020 15:28
To: Smith, Ian
Cc: Hambrook, Fiona; Paterson, Jennie
Subject: 19/03072/FULM - 2, 4, 6 And 8 Danson Road Bexleyheath

Hi Ian,

Planning policy comments below. Helen will provide comments on the potential heritage impacts separately.

Principle of development

As mentioned at the preapplication stage, we are preparing an updated strategic housing market assessment (SHMA) which suggests that, regarding older persons' housing, there is a much larger need for C3 specialist older persons' accommodation in the borough than there is for C2 residential care. In fact this scheme on its own would exceed the whole borough's total need for C2 residential care accommodation up to the year 2036.

The applicant has provided a demographic analysis to demonstrate the need for the proposal, which concludes there is a much larger need than our emerging SHMA- a shortfall of 1,495 beds by 2028:

- The report concludes a shortfall of 1,495 beds within a 5 mile radius, but only 661 beds borough-wide. It is not clear why you would only look within a 5 mile radius, especially as the care home will be advertised borough-wide.
- A differentiation between C2 and C3 accommodation is not made within the report, and in fact it seems to have removed C3 specialist accommodation from the predicted supply entirely: "*In our assessment of bed supply, we have removed homes providing specialist care.*" – but does not appear to have removed C3 accommodation from the calculated need.
- Our emerging evidence is suggesting that Bexley's future needs can be met in ways other than through C2 accommodation. Colleagues in social health should be consulted on these proposals, and informal conversations with the team suggest that they agree that the borough currently has a surplus of C2 accommodation.
- The applicant has also assumed a loss of 203 beds through the expected closure of smaller care homes – I am not sure this assumption is valid. There may be a higher barrier for entry into the market for smaller care home providers, however this does not necessarily mean that *established* smaller providers will cease to operate.

However, our emerging SHMA has not yet been published, and will not be published until the summer. Therefore it cannot be relied upon at this stage, and I think we would struggle to resist this application on these grounds. We can disagree with their evidence as much as we like but if we have nothing more up-to-date to come back at them with, we're in a bit of a tricky position.

Sustainability

- For the purposes of the energy assessment, this development is considered a major non-domestic scheme, and as such is required to achieve a 35% reduction in carbon emissions compared to building regulations. There is not currently a requirement for zero carbon non-domestic development, although this will come into force once the new London Plan is adopted.
- The applicant has provided an energy statement which explores the suitable technologies and measures to achieve the required CO2 reductions, and states that a 35% reduction can be achieved through the use of PV, air source heat pumps, and building fabric improvements.
- **However, this needs to be demonstrated in more detail, in accordance with the GLA's energy assessment guidance (https://www.london.gov.uk/sites/default/files/energy_assessment_guidance_2018_-_update.pdf). The amount of CO2 saved at each stage of the energy hierarchy should be expressed in tonnes of CO2 per year, and set out clearly in tables within the report.**

- **Further details are required for the proposed PV and heat pumps, as specified in appendix 3 of the above mentioned guidance.**

Ecology

- The applicant has provided a Preliminary Ecological Appraisal which concludes that no further surveys are required.
- **2 bat boxes and 8 bird boxes have been recommended as enhancement measures, these should be secured and their locations illustrated on plans.**

Thanks,

Joe Collinson

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