



2-8 Danson Road, Bexleyheath



Planning Statement



Boyer

Project:	2-8 Danson Road, Bexleyheath, Kent, DA6 8HB
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Primary Author	Alexandra Bamford
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1. INTRODUCTION

- 1.1 Boyer have been instructed by our client, Carebase Ltd., to prepare and submit a detailed application for planning permission proposing the redevelopment of 2 – 8 Danson Road, Bexleyheath, DA6 8HB (“the application site”).
- 1.2 The application seeks planning permission for the following development:

“Demolition of the houses at 2 to 8 Danson Road and erection of a part 1, part 2, part 3 storey 70 bedroom nursing home (Use Class C2), with associated access alterations, car and cycle parking, landscaping and amenity space.”
- 1.3 This Planning Statement (Statement) sets out why the proposal is considered acceptable in planning terms and why it should be supported by the Council.
- 1.4 In terms of structure, this Statement provides a summary of the site and its history before setting out the planning justification for the development. Against this background, this Statement addresses the following:
 - Site and Surroundings;
 - Planning History;
 - Proposed Development;
 - Planning Policy; and
 - Planning Justification.
- 1.5 This Statement concludes that the proposed development is compliant with national, regional and local planning policy and is therefore considered acceptable and, as such, planning permission should be granted without delay.
- 1.6 The planning application is supported by the following technical reports:

Documents	Consultant
Arboricultural Report	Down to Earth Trees Ltd.
Archaeological Assessment (Desk-top)	Archaeological Collective
Preliminary Ecological Appraisal	GreenLink Ecology Ltd.
Care Home Economic Benefits Report	Boyer Planning
Demographic Needs Analysis	Cushman & Wakefield
Landscape and Visual Appraisal	Tyler Grange Group Ltd.
Transport Statement	Ardent Consulting Engineers
Noise Impact Assessment	Ardent Consulting Engineers
Air Quality and Dust Risk Assessment	DustScanAQ
Design and Access Statement	Ryder Architecture Limited
Statement of Community Involvement	Curtin and Co.
Sustainability Statement and Renewable Energy Statement	Elementa
Flood Risk/ Foul & Surface Water Management Statement (Including Drainage Strategy)	Ardent Consulting Engineers
Heritage Statement	Architectural Management Ltd.
Company Profile	Carebase Limited

About the applicant

- 1.7 Carebase Ltd. was established in 1990 and is considered a leading nursing home operator, currently with 14 homes across London, the South East and East Anglia. The applicant provides high quality residential, nursing and dementia care for over 700 residents across its homes and employs over 1,000 team members across various roles, including nurses, home managers, chefs, administrators and property maintenance.
- 1.8 In Bexley, Carebase Ltd. already have an established presence at the award-winning Heathfield Court (147 Colyers Lane, Erith, DA8 3PB). This home provides high quality residential, nursing and dementia care that has been rated as 'Good' in all areas by the Care Quality Commission.
- 1.9 The applicant is recognised across the care industry as providing exceptional facilities together with market leading care to its residents and their families. In addition, the applicant is recognised for its culture and has won over 25 individual care home awards, including the National Winner at the Great British Care Awards for 'Care Employer of the Year' in 2015, 'Care Innovator' and 'Putting People First' in 2018 and the 'Care Home Team' award in 2019 – HEATHFIELD COURT.
- 1.10 Submitted with the application is a 'Company Profile', produced by Carebase and which sets out more detailed information about the company, its values, its culture and how its care homes seek to integrate into the local community, for example engaging with local businesses and schools.

2. SITE AND SURROUNDINGS

- 2.1 The application site is approximately 0.35 hectares in area and comprises the domestic curtilages at 2-8 Danson Road in Bexleyheath. The site is situated on the west side of Danson Road, a short distance to the south of the junction with Park View Road (A207). The site is broadly rectangular in shape with the existing houses set back from the highway's edge (by between approximately 15m and 20m), behind largely hardsurfaced front gardens which are used for car parking and turning.
- 2.2 The site originally would have comprised two pairs of semi-detached houses, but nos.4 and 6 have been heavily extended in the past such that they now connect, creating a large, unbroken frontage of 4 terrace houses.
- 2.3 The houses benefit from long rear gardens (approximately 50m in length). The gardens are predominantly laid to lawn with hedgerows and other soft landscape features lining the boundaries. To the rear of nos.2 and 6 are large domestic outbuildings. These buildings stand alongside the rear boundaries and as such are visually prominent from within Danson Park and (in the case of the building at no.2) are prominent in views along the entrance path into the park which runs alongside the site's northern boundary.
- 2.4 To the West (rear) of the site is Danson Park, a Grade II Listed Park designated as 'Metropolitan Open Land' and in part as an 'Borough Grade 1 Site of Importance for Nature Conservation (SINC)', that contains Danson Park Mansion, a Grade I Listed Building as well as a stables, which are Grade II* Listed Building. To the North of the site is the entrance and access path to Danson Park. The entrance is marked by tall gates and piers fronting onto Danson Road and the entrance path itself is approximately 25m wide at the entrance, narrowing to approximately 10m at the end of the application site.
- 2.5 The entrance to the park comprises a central pathway with areas of grass to the northern and southern sides. The boundaries with the application site (no.2 Danson Road) and the house to the north (no.1 Danson Mead) are lined with mature hedgerows which stand to approximately 2.5m in height along with tree planting.
- 2.6 Although the access to the park is light, it is also characterised by views of built form, comprising the northern flank elevation of the house at no.2 Danson Road and the large outbuilding to the rear of that site. To the northern side, the white painted flank elevation of the house at no.1 Danson Mead is especially prominent given its recessed location combined with its height and proximity to the boundary. Additionally, given the orientation of the path and the location of the houses on Danson Road, the rear elevations of the houses are visually prominent.
- 2.7 The rear boundary of the application site (separating the site from Danson Park) is made up of different boundary treatments and the rear elevations of the outbuildings described above. The treatments are of varying styles and are in relatively poor condition and as such detract from views within the park.

- 2.8 The area surrounding the application site is primarily in residential use, predominantly characterised by 2 and 3 storey houses. Although the area displays an attractive character, it is not designated a conservation area, or other area of special character which would warrant particular policy controls.
- 2.9 The site is located in Flood Zone 1 and therefore there is a low risk of flooding.
- 2.10 The site has a PTAL rating of 2 (where 0 is the worst and 6b is the best) but this belies the ease of access by public transport connections. Bexleyheath Train Station is located 790m to the North-east of the site and Danson Road is well served by a number of bus routes which provide quick and convenient connections to Bexleyheath, Welling and centres beyond.

3. PLANNING HISTORY

3.1 The properties comprising the application site have been subject to a number of domestic extension applications historically but from a review of online records, there does not appear to have been any redevelopment proposal along the lines proposed in this application.

3.2 For ease of reference, the site's planning history is set out in the table below:

Address	Reference	Proposal	Decision
2 Danson Road	83/01771/FUL	Single storey rear and two storey side extension incorporating domestic garage.	1984, Granted
2 Danson Road	97/01749/FUL	Part 2 storey and part 1 st floor rear extensions.	1997, Granted
4 Danson Road	95/00375/FUL	Part1/Part 2 storey extension to side and rear. Single storey extension to rear.	1995, Withdrawn
4 Danson Road	96/00752/FUL	Two storey extension to side. Single storey extensions to rear.	1996, Granted
4 and 6 Danson Road	96/01963/FUL	Retention of a part 1/ part 2 storey side and rear extension incorporating garage to number 4 and a first floor side/rear extension and a conservatory to number 6.	1996, Granted
6 Danson Road	96/00281/FUL	Single storey extension front and rear incorporating garage.	1996, Granted
6 Danson Road	12/01398/LDCP	Certificate of Lawfulness (Proposed) for external alterations to the rear elevation comprising, the installation of folding patio doors in the rear elevation of the existing single storey rear extension, alternative placement of two existing roof lights and an additional two roof lights in the rear place of the existing single storey rear extension and a new soil vent pipe.	2012, Granted
8 Danson Road	82/01020/FUL	Ground floor rear extension.	1982, Granted
8 Danson Road	86/01908/FUL	Single storey side/rear extension.	1997, Granted

Other notable planning history

- 3.3 At 43, 45 and 47 Stephen Road, Bexleyheath, planning permission was granted under reference 09/01773/FULM for the demolition of three houses and the construction of a 53 bedroom care home with associated parking and access alterations.
- 3.4 In granting that permission, the Council will have addressed the matter of loss of housing in favour of the care home use, clearly finding that the development was acceptable in this respect.

Pre-Application Discussions

- 3.5 As part of the planning process, and in the spirit of paragraph 39 of the NPPF which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system, the applicant engaged in pre-application discussions with the Council.
- 3.6 A pre-application submission, comprising plans and elevations together with an outline planning justification was submitted to the Council in February 2019. The enquiry was processed by the Council under reference: 19/00272/PREAPP. A meeting was subsequently held with the Council on 13 March 2019 during which the proposal was discussed in detail. No detailed written advice was provided by the Council, but the case officer emailed the applicant's agent on 6 June 2019 and set out a list of 10 bullet points which detailed a range of observations and initial concerns which would need to be addressed in any future planning application.
- 3.7 The Council's response set out a number of matters to be dealt with in the application, including whether the development would result in a loss of dwellinghouse accommodation; whether the proposed use would fall within Use Class C2 or C3; how access and car parking and servicing was to be managed; and how the development would impact on Danson Park. Additionally, the Council requested that the application be supported by additional detail in respect of the building's scale and design, its impact on trees, its impact on ecology and provided technical detail in respect of drainage and energy.
- 3.8 It is considered that all the points raised by the Council at pre-application stage have been successfully addressed. Further details of this are available set in the Planning Justification section of this Statement, and also in the Design and Access Statement and other technical reports supporting this planning application.

4. PROPOSED DEVELOPMENT

- 4.1 This section provides an overview of the description of the proposed development and it should be read in conjunction with the Design & Access Statement, prepared by Ryder Architects.
- 4.2 The proposed development will provide a 70-bed nursing home for high dependency residents with dementia and end of life care needs. Given the specialist, complex and life limiting care needs of all future residents, the home will operate under Use Class C2. In this way the proposed home will operate in the same way as Carebase's current facility at Heathfield Court, Colyers Lane in Erith. In defining the proposed Use Class, it is relevant to refer to The Town and Country Planning (Use Classes) Order 1987 (as amended) which describes Class C2 uses as *"Use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses))."*
- 4.3 The "Intend to Publish London Plan" adds further clarity here, with paragraph 4.13.4 setting out that care home accommodation will have the following attributes:
- Personal care and accommodation are provided together as a package with no clear separation between the two;
 - The person using the service cannot choose to receive personal care from another provider;
 - People using the service do not hold occupancy agreements such as tenancy agreements, licencing agreements, licences to occupy the premises, or leasehold agreements or a freehold; and
 - Likely CQC-regulated activity will be 'accommodation for persons who require nursing or personal care'.
- 4.4 The proposed use will have all the above attributes.
- 4.5 The future residents of the home will have complex medical and life-limiting conditions and as such can no longer properly or safely be cared for in their home with support from District Nurses. Rather, their conditions are so advanced and complex that they require constant access to medical care and nursing support. The proposed nursing home will provide secure accommodation across three above ground floors with the ground floor providing general nursing care with the two upper floors providing dementia care accommodation.
- 4.6 Given the complex medical needs of all future residents and the intensity of care which will be provided within the home, the use goes beyond what could operate under Use Class C3(b) (being a dwellinghouse use with an element of care). It is, therefore, unequivocally the case that the proposed development constitutes a C2 use.
- 4.7 As set out in the document produced by the applicant, typically their residents are only at the home for up to a maximum of 2 years before either moving into hospice accommodation, or passing away.

- 4.8 The proposed nursing home will provide 70 bedrooms, all of which will be finished with ensuite wet rooms. Consistent with the Carebase model, the home will be finished to an exemplary standard with high quality and comfortable soft furnishings in the bedrooms and communal spaces. The applicant's brand is recognised as providing high quality accommodation in order that their residents enjoy the same level of comfort and amenity with which they are accustomed in their own home, meaning each room has connection to Sky television and the home is fitted with high speed broadband. The communal living rooms are comfortable and welcoming spaces and are "family friendly" meaning the residents' families, including children are comfortable when visiting.
- 4.9 Alongside these features are the communal bathrooms which again are decorated to a high standard but which have specialist baths, hoists and other equipment which is required given the advanced care needs of the residents.
- 4.10 The development includes lower ground floor accommodation, which will provide storage space, the home's kitchen and laundry along with treatment rooms, assisted bathrooms, plant rooms and staff facilities. In addition, at this level there will be two day spaces, a private dining room and 16 bedrooms which will open onto a new sunken courtyard garden.
- 4.11 The proposed building would generally have an "L" plan form with the three storey element across the front and the rear limb reducing in height to 2 storeys and being cut into the ground in order to minimise the height of this element.
- 4.12 A large, accessible residents' garden is located to the rear of the home and will comprise a water feature surrounded by a sensory garden to the south-west, a patio and garden adjacent to the orangery, and a formal terrace garden with perennial planting, seating spaces and three further water features to the south of the site.
- 4.13 To the north-east corner of the building will be a bin store, providing refuse and recycling storage spaces along with medical waste bins. The home will be serviced by a private waste collection company.
- 4.14 The Design and Access Statement sets out a detailed analysis of the proposed design, including where references are made to the character of development in the surrounding area. Generally, the building's design is a modern interpretation of Arts and Crafts style developments which characterise Danson Road. Obvious references to Arts and Crafts style is evident in the pitched roof, chimneys and through the use of brick and tile to the main part of the building.
- 4.15 The rear limb takes on a different, contemporary design that is subservient to the main house. Set back from the park and the park entrance, behind layers of vegetation, the form is clad in a natural red/brown zinc in order to be a subtle and unimposing addition to the building. This careful design ensures that this part of the building will be discrete with views towards it heavily filtered by the proposed landscape features.

- 4.16 In respect of access and parking matters, the existing crossovers are to be closed at no.4 and no.6 Danson Road, but remain open at no.8 (which will be used as the entrance to the site) and at no.2 (which will be used as the exit) .The exit at no.2 is proposed to be slightly widened to ensure that safe and convenient access to Danson Road can be provided. Within the forecourt 17 car parking spaces are proposed and a disabled car parking space is located close to the main entrance of the building and adjacent to the site's northern boundary.
- 4.17 In order to promote use of electric vehicles, 20% of the spaces will be provided with electric charging points.
- 4.18 The Transport Statement sets out in more detail the proposed arrangements regards the use of the parking spaces and anticipated access arrangements for staff. It should be noted that the applicant intends to adopt a Green Travel Plan and in addition will provide a mini-bus service at the home, providing a convenient link between the home and local stations and centres, minimising the use of private cars to access the site.
- 4.19 In total, 16 cycle parking spaces are shown, 4 spaces to the front of the building and 12 spaces within a secure shelter at the rear of the site, adjacent to the southern boundary. The shelter will be accessible via a side gate.
- 4.20 In respect of landscape and outdoor amenity provisions, the plans detail considerable open space and new planting across the site. The secure communal sensory garden planted with trees, hedges and shrubbery on the southern, eastern and northern boundary, provides residents with a good level of communal amenity and lessens the visual impact by screening the adjoining residential properties and Danson Park and entrance.
- 4.21 Across the site's frontage, the hardstanding area will be softened by ornamental shrub planting and the retention of existing trees. Overall, the site's frontage will be enhanced compared with the current situation with greater provision of high quality soft landscaping.

5. PLANNING POLICY CONTEXT

Policy Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The application site falls within the London Borough of Bexley. The Development Plan comprises the following documents:
- London Plan (2016)
 - Emerging London Plan (2019)
 - Bexley Core Strategy (2012)
 - Addendum Statement (Saved policies) to the Bexley Unitary Development Plan (UDP) (2012)
- 5.3 The policies relevant to the proposed development are detailed in the table below:

London Plan 2016	Bexley Core Strategy 2012	Saved Policies of the Bexley Unitary Development Plan 2012
<ul style="list-style-type: none"> • 3.1 Ensuring Equal Life Chances for All • 3.14 Existing Housing • 3.17 Health and Social Care Facilities • 5.13 Sustainable Drainage • 6.3 Assessing Effects of Development on Transport Capacity • 6.13 Parking • 7.2 An Inclusive Environment • 7.4 Local Character • 7.6 Architecture • 7.8 Heritage Assets and Archaeology 	<ul style="list-style-type: none"> • CS01 Achieving Sustainable Development • CS07 Welling Geographic Region • CS08 Adapting to and Mitigating the Effects of Climate Change • CS10 Housing need • CS16 Reducing the need to travel and the impact of travel • CS17 Green Infrastructure • CS19 Heritage and Archaeology 	<ul style="list-style-type: none"> • G17 Sustainable Transport • G26 Conservation of the Natural and Built Environment • ENV24 Sites of Borough Importance for Nature Conservation • ENV35 Trees and Hedges – planting, protection and retention • ENV39 Built Environment • ENV51 Listed Buildings – Protection • H3 Character of Local Residential Area • H8 Infill, backland and similar development • T1 – Applications for Major Developments – Travel Plans

		<ul style="list-style-type: none"> • T2 – Applications for Major Developments – Full Transport Assessments • T17 – Off-street Parking Spaces
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Supplementary Planning Guidance

5.4 The Supplementary Planning Guidance policies relevant to the proposed are detailed below:

- Sustainable Design and Construction Guide SPD (2007)
- Sustainable Drainage Design and Evaluation Guide (2018)

Material Considerations

National Planning Policy

5.5 The National Planning Policy Framework (NPPF) (2019) sets out the Government’s planning policies for England and how these are expected to be applied. It forms part of the overall framework of National Planning Policy, and is a material consideration in decisions on planning applications. In 2019, the Department for Communities and Local Government (DCLG) published the National Planning Practice Guidance (NPPG). It provides further detailed guidance on the interpretation of the NPPF policy.

5.6 The NPPF supports a presumption in favour of sustainable development and sets out at Para 14 that ‘for decision-taking this means: approving development proposals that accord with the development plan without delay’.

5.7 Paragraph 61 notes the importance of delivering homes for different groups in the community, including older people, who are in need of care. ‘Older people’ are defined in the NPPF as ‘people over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through the full range of retirement and specialised housing for those with support or care needs’.

Emerging London Plan

- 5.8 On 17 December 2019, the Mayor of London issued an “Intend to Publish” version of the new London Plan alongside documents explaining where the Inspector’s recommendations are being accepted and where others are being rejected.
- 5.9 Policy H1 deals with the need to increase housing supply and sets and challenges Councils to meet ten year housing supply targets. In addition, at part 2, the policy seeks to ensure that developments optimise the potential for housing delivery on all sites. The explanatory text at paragraph 4.1.9 explains, “*net non-self-contained accommodation for older people (C2 use class) should count towards meeting housing targets on the basis of a 1:1 ratio with each bedroom being counted as a single home.*”
- 5.10 The New London Plan Policy H9 deals with the need to ensure best use of existing housing stock and challenges Boroughs to promote efficient use of existing housing in order to *inter alia*, reduce the number of under-occupied dwellings.
- 5.11 Emerging Policy H12 deals with supported and specialised accommodation and explains that the delivery of such housing should be supported where it meets an identified need. The policy accepts that the form such development will take will vary depending on the specific use or group the development is intended for, whilst providing a further accommodation option for London’s population. The policy lists 8 possible types of accommodation that are addressed by the policy, including “*accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible*” and “*accommodation (short term and long term) for people with mental health issues who require intensive support*”.
- 5.12 Emerging Policy H13 deals with Specialist older persons housing and the supportive text at paragraph 4.13.4 categorically states that the policy does not apply to any accommodation which is considered care home accommodation. Notably, however, the text at paragraph 4.13.14 refers to care accommodation, stating that class C2 uses are an “*...important element of the suite of accommodation options for older Londoners and should be recognised by Boroughs and applicants. To meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year. The provision of Care Quality Commission rated Good or Outstanding care home beds is growing at around 3,525 bed-spaces a year in London and provision of dementia-capable bed-spaces at a rate of 2,430 places a year.*”

6. PLANNING JUSTIFICATION

6.1 This section assesses the development proposal in more detail against the objectives of relevant planning policies and guidance noted in the previous section. Broadly, below are considered to be the principal matters relevant to the determination of the application and we set out the case in support of each with relevant references to the supporting technical reports.

Principle of Development

- 6.2 The Council's pre-application advice highlights two matters for discussion in this section, first whether the proposed use would fall within Use Class C2 or C3 and following on from this, if the proposed development is a C2 use, does the proposal result in the unacceptable loss of housing?
- 6.3 In respect of the first matter, it is abundantly clear from the description of development and the explanation of the nature and intensity of the care provided (which is inexorably linked with the residential occupation of the building) that the development will constitute a C2 use.
- 6.4 The question then follows whether the introduction of a C2 use onto the site will result in the unacceptable loss of dwellinghouses. The Intend to Publish London Plan provides helpful clarity on this point and demonstrates the approach the Council must take in considering the question. As noted above, the text at paragraph 4.1.9 in support of emerging Policy H1 explains, "*net non-self-contained accommodation for older people (C2 use class) should count towards meeting housing targets on the basis of a 1:1 ratio with each bedroom being counted as a single home.*" Thus it is the case that the development will not result in a loss of housing, but will deliver 70 homes to the Council's 5 year land supply (a net increase of 66 units).
- 6.5 In the light of the foregoing, a conclusion can quickly and easily be reached on the questions of principle highlighted by the Council during the pre-application exercise. First, the proposed use falls within Use Class C2 and second, the development will make a significant and positive contribution to housing delivery in the Borough with a net gain of 66 units being achieved. The principle of development is, therefore, acceptable.
- 6.6 National, regional and local policy supports the provision of care homes (C2 Use Class) in Bexley with paragraph 61 of the NPPF specifically emphasising the importance of delivering homes for 'older people', who are in need of care within specialist housing accommodation.
- 6.7 In the emerging London Plan, Policy H12 specifically sets out to promote the delivery of the type of accommodation proposed in this application and it is evident from the description of development and the nature of the proposed use that the development will fit neatly within the examples of the uses covered by this policy.

- 6.8 Likewise, Core Strategy Policy CS01 (Achieving Sustainable Development) and London Plan Policy 3.1 (Ensuring Equal Life Chances for All) and Policy 3.17 (Health and Social Care Facilities) supports development proposals that provide high quality health and social care for an aging population.
- 6.9 Policy CS10 further advises that the Council will seek to ensure that a broad mix of accommodation options are available to residents and that a range of local housing needs are met. In ensuring this, the Council will seek to optimise housing output in line with character assessments of each area.
- 6.10 Bexley's Strategic Housing Market Assessment (SHMA), Joint Strategic Needs Assessment and Aging Well Strategy (2018) identify that in 2012, 16% of people in Bexley were 65 or more, compared to 12% across South East London. By 2031, this is projected to increase to over 19% compared to 15% for South East London as a whole.
- 6.11 The SHMA also assesses the forecast need for specific demographic groups, including the elderly, and notes some very serious and significant trends. Between 2012-2032, Bexley is projected to experience a 30% increase in the number of people aged 65 and over. Furthermore, a 92% increase is projected in the population aged 85 or more, the highest in the South East. With such significant increases forecast, it is plain that the need for specialist care and nursing home accommodation is going to rise sharply in Bexley.
- 6.12 The Demographic Needs Analysis, prepared by Cushman and Wakefield indicates that there is already a significant unmet demand for care home accommodation in Bexley. The study found within a 5 mile radius of the application site the provision of 2,896 beds across 23 care homes and 31 nursing homes. Within the next 10 years, the predicted bed demand is set to increase to 1,113 by 2023 and 1,495 by 2029.
- 6.13 In order to meet demand, the Cushman and Wakefield Analysis advises that supply must increase by 40% compared to the national average of a 19% increase. The proposed 70 bed nursing care home would provide an important contribution to the scarce supply. The Cushman and Wakefield Analysis predicts that this trend will significantly worsen, since the number of Bexley's residents aged 60 and over will have increased to 51,043 by 2030, an increase of 10,079 in just 13 years.
- 6.14 The Cushman and Wakefield Analysis also identifies a growing demand for specialist dementia care, with 2,654 people aged 65 and over are living with dementia in Bexley, which is predicted to rise to 4,659 in the next 20 years. The applicant's proposed development will make a significant and important contribution to the delivery of dementia care accommodation in the Borough.

- 6.15 As evidenced within the Demographic Needs Assessment, Bexley currently has a requirement for 661 specialist bed-spaces per year until 2028, however this target is not being met and so there is a significant undersupply. There is an urgent and pressing need for this type of accommodation, meaning the proposed development will supply high quality nursing home accommodation to the local population. The urgent and acute need for care home accommodation of the type being proposed adds substantial weight in favour of the proposed development.
- 6.16 In addition to the development delivering essential care infrastructure, there are additional benefits arising from the development which are important material considerations which attract positive weight in the planning balance. First, following completion of the development, 70 Borough residents will be able to move out of unsuitable and under occupied general needs housing, allowing younger families an opportunity to move into larger accommodation suited to their changing life needs. In this way, the development attracts support from emerging London Plan Policy H9, which specifically encourages Boroughs to look for opportunities to reduce the under-occupation of existing housing.
- 6.17 Finally, the applicant's evidence demonstrates that the proposed home's catchment will predominantly fall within Bexley Borough, meaning it is current Bexley residents who stand to benefit from the development. To emphasise this benefit, the applicant proposes to offer, exceptionally, that Borough residents are given priority over out of Borough residents when rooms become available. As noted above, given their advanced care needs, residents of the applicant's homes are typically in occupation for less than 24 months and given the acute need for such accommodation, vacant rooms are in high demand and typically remain vacant for a very short period of time, potentially only 1 week, before a new resident takes occupation.

Rearward projection/ Backland development

- 6.18 In providing pre-application advice, the Council indicated that the proposed development might be considered "backland development". Backland development is defined in the glossary of the Core Strategy as "development on land often behind or to the side of the rear building line of existing housing or development, and is usually land that has previously been used as gardens or private open space, or is partially enclosed by gardens". The definition aligns with the general understanding of what constitutes backland development, this being the subdivision of existing sites to establish a new row of development to the rear of that retained across the frontage.

- 6.19 The relevant policies in the development plan comprise UDP Policy H8 and Core Strategy Policy CS17. The latter seeks to resist backland development where this would be harmful to green infrastructure (including open spaces and waterways). The former explains that backland development consists of new residential development to the side or rear of existing dwellings and sited on gardens or incidental open space. In this way the policy adds further clarity to the definition of backland development set out in the glossary to the Core Strategy, making clear that to constitute backland development, the proposed development would need to comprise a separate, independent development to the rear or side of retained existing development at a site.
- 6.20 The development proposed in this application comprises the demolition of existing houses fronting Danson Road and the construction of a replacement building, also located at front of the site. The development would include a rear “extension” to the proposed building, but based on the glossary definition and clarification set out in policy H8, fundamentally this does not constitute backland development as it would not consist of a new and independent row of development to the side or rear of the retained or replacement development.
- 6.21 The rear extension forms an integral part of the proposed care home and therefore cannot be considered a form of “backland development”.
- 6.22 In the event that the Council takes the opposing view on this matter, without prejudice to the foregoing, the development would nevertheless comply with Policies CS17 and H8.
- 6.23 Policy CS17 objects to backland development where it would be harmful to green infrastructure and paragraph 4.8.10 of the reasoned justification explains that backland sites should not be developed where a development would cause harm to amenity or biodiversity. In respect of the former, the evidence set out above and in the Design and Access Statement demonstrates that the proposed development at the site would not give rise to any harm to amenity and the Heritage Assessment clarifies that there would not be any unacceptable harm to the setting of Danson Park.
- 6.24 In respect of biodiversity, the application is supported by a Preliminary Ecology Assessment which identifies that the site is of low ecological value and demonstrates that biodiversity will be enhanced through the development. Accordingly, the application complies with Policy CS17.
- 6.25 Notwithstanding that the proposed development does not meet the definition of development required to engage Policy H8 (i.e. it does not constitute the development of new dwellings to the side or rear of existing dwellings), the policy establishes 4 tests which new development needs to be in order to be supported. The first relates to highway matters, requiring that adequate and safe access for vehicles and pedestrians is provided with no harmful impact on neighbours or their gardens. The proposed access points are located to the front of the site and will provide safe access arrangements for cars, pedestrians and cyclists. Due to their location, the accesses will not harmfully impact upon adjacent houses or gardens.

- 6.26 Second, the policy requires that the proposed dwellings are adequately separated from others in terms of amenities, light, privacy and garden space. The rear extension to the home is very well separated from neighbouring houses with no immediate or direct views provided across open spaces or into habitable rooms. Due to the level of separation, there will be no adverse impact in respect of light amenity or any harmful impact on surrounding gardens.
- 6.27 Third, the policy requires that there is no harmful effect on the character of the area. Other than from vantage points along the entrance to Danson Park, the rear extension will be hidden from public view and as such it will not materially impact on the area's character. From vantage points where it will be seen, the extension will be discrete given its minimised height and the use of carefully selected materials. Moreover, it will be viewed in context with the recessed house at no.1 Danson Mead, which occupies a similar rear building line to that which is proposed but which is far taller than the rear extension and is visually prominent given its proximity to the boundary and the lack of screen planting to filter views. The rear extension will not, therefore, have any harmful effect on the area's character.
- 6.28 The final policy test requires that development preserves landscape and nature conservation features of interest. The development will protect the existing hedgerows along the site's boundaries and will enhance planting within the site, resulting in an overall localised enhancement to landscape features.
- 6.29 In view of the above assessment, the proposed development, if considered by the Council to constitute backland development, complies with the objectives of Policies CS17 and H8 and should, therefore, be supported in this regard.

Heritage

- 6.30 Policy 7.8 (Heritage Assets and Archaeology) of the London Plan, Core Strategy Policy CS19 (Heritage and Archaeology) and Bexley's UDP Policy G26 (Conservation of the Natural and Built Environment) and ENV51 (Listed Building – Protection) advise that proposals affecting heritage assets will use high quality materials and design features, which incorporate or compliment those of the immediate area. Further to this, the policies state the need for a clear and detailed assessment of any heritage assets that may be affected by the proposed development.
- 6.31 NPPF paragraph 189 highlights the importance of the 'significance' of the setting of a heritage asset. In paragraph 193, the NPPF recognises that where a development proposal will lead to 'less than substantial harm', the proposal's harm should be weighed against the public benefits that the proposed scheme will bring with permission being granted where the benefits outweigh any harm.
- 6.32 Whilst the site is not itself a designated heritage asset and is not located within a conservation area, the proposed development might be considered to be within the setting of Danson Park.

- 6.33 Submitted with the application is a Heritage Statement, prepared by Architectural Management Ltd. This Statement thoroughly assesses the impact of the proposed development on Danson Park (itself a Grade II listed park) along with the Grade I Listed Danson Park Mansion and Grade II* Listed Stables.
- 6.34 The Heritage Statement advises that whilst the proposal will have an impact on the park entrance, this impact is not considered to be overly significant, since the existing residential development on the opposite side of the park entrance has already set a precedent and alters the original setting. The Statement concludes that the impact on the listed buildings and the wider setting of the Park will be 'Neutral' and 'Slight'.
- 6.35 The Heritage Statement concludes that whilst the proposed development will occasion a degree of change to the setting, no overall harm would be caused to the Listed Buildings or the wider setting of the Park. Moreover, it notes that there will be a slight beneficial change to the immediate setting of the proposal site resulting from unifying the rear boundary treatments and other visual improvements being delivered through a high quality landscaping scheme at the site.
- 6.36 In accordance with the findings and conclusions set out in the Heritage Statement, the development would not give rise to any harm to the surrounding heritage assets and as such, paragraph 196 of the NPPF is not engaged. The proposed development complies with the relevant policies of the development plan in respect of heritage matters and as such should be supported in this respect.

Design

- 6.37 The proposal demonstrates a high quality design that has been carefully considered in order to respect and reflect the character of the locality. A summary of the key qualities of the design and the assessment of these against planning policy is provided below.
- 6.38 Core Strategy Policy CS07 (Welling Geographic Region) aims to, amongst other things, reinforce the character and identity of Welling and enhance its attractiveness through high quality development. Together, London Plan Policies 3.5 (Quality and Design of Housing Developments), 7.2 (An Inclusive Environment), 7.4 (Local Character) and 7.6 (Architecture) along with UDP Policy ENV39 (Built Environment) all require that proposals recognise local features and character, relate well to their surrounds and help enhance locally distinctive places of high architectural quality and inclusive urban design.
- 6.39 UDP Policy H3 (Character of Local Residential Area) states that any residential development should be compatible with the character or appearance of the local area. Furthermore, in line with Core Strategy Policy CS17 (Green Infrastructure) the proposal will retain the important landscape features and provide additional benefit.

- 6.40 The existing dwellings are of no architectural merit and are not located in a conservation area so the redevelopment of the site with the houses being replaced by a modern building of a plainly high design quality represents a very clear enhancement. The Design and Access Statement, prepared by Ryder Architecture, makes clear the process which has been followed in designing the building and the rigorous attention to detail ensures that the proposed building has been designed to reflect and compliment Danson Park, Danson Mansion, the Stables and its setting, will be in keeping with the character of the area and will make a positive contribution to the street scene.
- 6.41 A Landscape and Visual Appraisal has been prepared by Tyler Grange Limited. Firstly, the Appraisal concludes that the overall changes to the identified landscape typologies within the site will be neutral, since the landscape does not possess qualities or characteristics which would indicate that it is of more than local value. Second, it concludes that the set-back development should result in relatively minimal visual impact since the site is already partially developed and will therefore make a positive contribution through a soft landscaping strategy that will help assimilate the proposed development into the surroundings.
- 6.42 In summary, the design, form and scale of the proposed building is entirely in keeping with the established character and appearance of the area. The high quality of the design and landscaping will result in an enhancement to the appearance of the site and its overall contribution to the street scene and the area's character in general. The proposal is therefore is considered acceptable in terms of design and accords fully with the requirements of Core Strategy Policies CS07 and CS17 and UDP Policies ENV39 and H3 and should therefore be support by the Council.

Amenity

- 6.43 The proposed development has been carefully designed to ensure that it provides and protects acceptable levels of amenity for both existing and future residents.
- 6.44 The proposed nursing home provides generously sized and well lit bedrooms for future residents along with high quality ancillary communal accommodation and high quality outside spaces (both private and communal). This ensures that the home will be comfortable with high levels of amenity for future residents.
- 6.45 With respect to the amenity of neighbouring properties, Bexley's Residential Design Guide SPD (2006) confirms that a separation distance of at least 22 metres between facing habitable room windows and 16m from habitable room windows to a flank wall. The details of the development's compliance with these standards can be found in the Design and Access Statement.

- 6.46 The proposed development's design and layout has been carefully considered and ensures that there will not be any harmful level of overlooking, overshadowing or loss of light. With regard to overlooking, the main part of the proposed building will be set 1.7m from the common boundary with no.10 Danson Road with a matching rear building line. This means that the impact on no.10 will not be materially different to the current arrangement and there will not be any harmful level of overlooking from the care home into the neighbour's rear garden.
- 6.47 The rear extension to the home will be set some 17m from the common boundary with no.10 and this generous amount of separation will prevent any overlooking of the neighbour's garden from this part of the new building.
- 6.48 In terms of light impacts, the neighbouring house at no.10 Danson Road is located due south of the application site and as such, any shadows cast by the building will fall within the application site or to the north. There will not be any overshadowing of the garden to the rear of no.10 and will not be any loss of light to the habitable rooms within that house.
- 6.49 The closest house to the north, no.1 Danson Mead is set approximately 25m from the site and as such will not be impacted by the proposed care home building in terms of light, privacy or other amenity consideration.
- 6.50 In respect of the building's visual impact from private vantage points within the neighbouring houses, the main part of the home will occupy similar front and rear building lines to the existing development at the site and as such will not have any unacceptable or overbearing impact on neighbouring gardens. As noted above, the rear extension will be cut into the ground and given the amount of separation between this and the neighbouring houses and gardens, it will not have any material impact and certainly will not be overbearing. The high quality landscaping scheme will further assimilate the home into its site and will filter views towards it from private vantage points.
- 6.51 In the light of the above assessment and the conclusions set out in the relevant technical reports, it is concluded that the development will not give rise to any harm to residential amenity and as such is compliant with the relevant policy tests and published guidance.

Highways and Transport

- 6.52 The application site has a PTAL of 4, which demonstrates that the site can easily be reached by public transport. It is noted that surrounding roads are well served by bus routes, providing quick and convenient connection to Welling and Bexleyheath town centres and stations. Bexleyheath Train Station itself is 816 m to the north east and is, therefore, within walking distance. The ease of access to the site by public transport demonstrates that this is a realistic option for visitors and staff employed at the site.
- 6.53 The scheme proposes the provision of 17 no. car parking spaces and 16 no. cycle parking spaces. In addition, the development will provide a mini-bus service, taking staff and visitors to local stations and centres in order to minimise the need to travel by car.

- 6.54 Bexley's Core Strategy Policy CS16 (Reducing the Need to Travel and the Impact of Travel), Policy T1 (Travel Plans) and T2 (Full Transport Assessments) of Bexley's UDP and Policy 6.3 of the current London Plan state that major developments must provide a 'transport assessment'.
- 6.55 Table 10.2 of the emerging London Plan's 'minimum cycle parking minimum standards' requires care homes (C2) to provide 1 space per 20 bedrooms for short-stay and 1 space per 5 staff for long-stay.
- 6.56 In terms of access, the site benefits from separate ingress and egress points which lead onto Danson Road, allowing vehicles (including Ambulances) to enter and park and to exit and re-join the highway in a forward direction.
- 6.57 With regards to trip generations from the proposed development, the Transport Statement, prepared by Ardent Consulting Engineers, predicts that there will be a small increase in two-way vehicle movements in the weekday AM and PM peak hours. It is predicted that there will be an increase of 10 two-way vehicle movements in the AM peak and 8 two-way movements in the PM peak. This is well below the 30 additional movements "starting point for discussions" set out in the DfT/DCLG TA Guidance and therefore the impact on the highway network will be negligible.
- 6.58 In terms of parking impact, the Transport Statement's parking accumulation study indicates that at any one time there will be a maximum of 11 vehicles parked in the site. This study allows for a level of resident car parking but the reality is that future occupants' health and care needs are so advanced that they will not be allowed to drive. In view of the foregoing and the evidence set out in the Transport Statement, it is considered that the development is acceptable in respect of parking and highway impacts.

Ecology and Tree Protection

- 6.59 Danson Park is designated as a 'Borough Grade 1 Site of Importance for Nature Conservation' and the entrance land as 'Metropolitan Open Land'.
- 6.60 Policy 7.17 (Metropolitan Open Land) and Policy 7.19 (Biodiversity and Access to Nature) of the current London Plan and Policy ENV24 (Sites of Borough Importance for Nature Conservation) of Bexley UDP state that development proposals should attempt to make a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 6.61 A Preliminary Ecological Report, prepared by GreenLink Ecology Ltd., determined that the site contains common/widespread habitat types that are not of conservation concern. The report stated that there is no significant risk of bats being directly affected by the proposals. To avoid seasonal risk of impacts in relation to potentially suitable habitats and bird boxes, mitigation measures have been recommended for breeding birds.

- 6.62 In accordance with the NPPF, recommendations have also been made for ecological enhancement measures to benefit habitats, bats and breeding birds, to provide a net gain for local biodiversity.
- 6.63 To comply with the requirements of Policy ENV35 (Trees and Hedges) of the UDP and the current London Plan's Policy 7.21 (Trees and Woodlands), an Arboricultural Report and Tree Survey has been carried out by Down to Earth Trees Ltd.
- 6.64 The report details a total of 22 trees, 9 of which were off-site. 1 of the trees was Category A, 3 Category B and the rest (18) were Category C and U. The latter are considered low quality and unsuitable for retention.
- 6.65 The trees located within the Historic Park and Garden and the two mature London Plane Trees located outside of no.2 Danson Road will be retained through this proposed development. As necessary, conditions can be used to secure compliance with the recommendations of the Arboricultural Report and ensure protection of the trees shown to be retained.
- 6.66 In respect of ecological and arboricultural matters, the development is considered to be acceptable and compliant with relevant policy guidance.

Other Technical matters

- 6.67 Below we outline relevant considerations surrounding drainage, energy, air quality and noise impact.
- 6.68 In respect of drainage, policy across the development plan promotes the use of SUDS to deal with surface water on site. Submitted with the application is a Flood Risk, Foul and Surface Water Management Statement (which includes details of proposed drainage arrangements). This statement concludes that a suitable drainage scheme can be implemented, that future residents will not be at an increased risk of flooding and that the development will not increase the risk of flooding elsewhere.
- 6.69 In respect of energy and sustainability, the 'Sustainability Statement and Renewable Energy Statement' concludes that the proposed development will comply with London Plan Policies, by installing air source heat pumps, solar photovoltaics, water efficient fixtures, bird-nesting measures and bike storage. Additionally, the Statement finds further benefit arising from the use of locally sourced building materials and notes that the development will meet the requirements of Part L2A of the Building Regulations (2013 edition incorporating 2016 amendments).
- 6.70 The Borough of Bexley is located within an Air Quality Management Area. London Plan Policy 7.14, Bexley's Core Strategy and UDP Policy EN41 seek to ensure that development proposals do not compromise air quality across the Borough by implementing Bexley's Air Quality Action Plan.

- 6.71 The Air Quality and Dust Risk Assessment concludes that with the implementation of the mitigation measures listed in paragraph 6.2.2 of that report, the proposed development can be considered 'air quality neutral' and therefore is compliant with all national, regional and local planning policy.
- 6.72 London Plan Policy 7.15 seeks to reduce and manage noise of development proposals.
- 6.73 The Noise Assessment concludes that the site is suitable for the proposed nursing care home development subject to recommendations. To mitigate the impact upon the residents and staff, the report recommended good quality double-glazed windows and standard ventilation and during the construction phase and to the amenity of residents post construction, the use of screened terraces, the restriction on working hours, temporary screening, and locating stationary machinery behind non-sensitive buildings are advised. In view of the foregoing and the detailed assessments and conclusions set out in the technical reports which support the application, it is clear that the proposed development is policy compliant in these respects.

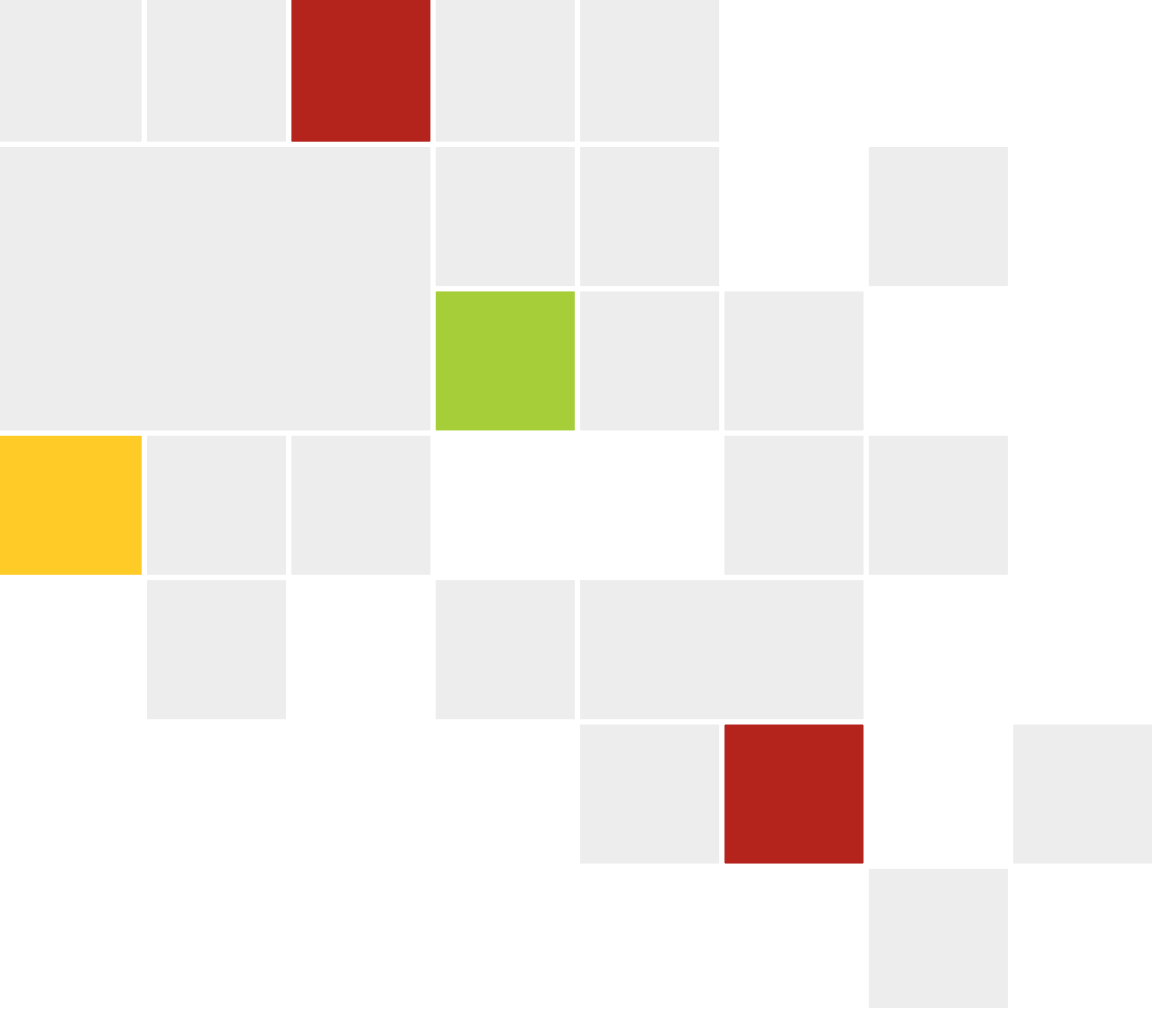
Other material considerations

- 6.74 As set out above, there are a raft of benefits being delivered through this development, including nursing home provision, significantly increasing housing supply, alleviating pressure on District Nurses and GPs, visual enhancements to the site and street scene given the quality of design alongside biodiversity and ecological benefits. There are additional economic benefits which will be delivered through the proposed development and these are relevant to the outcome of the application.
- 6.75 The range of economic benefits are detailed in the Economic Benefits Statement and need not be rehearsed here, but in brief, the following matters are noted:
- Creation of around **35 construction jobs**;
 - Creation of **31 jobs in the home**, the majority being Bexley residents;
 - **Local spending by the home of close to £100,000 per annum** on items such as local staffing agencies, local entertainers, pharmacy advertising, local food suppliers, maintenance and floristry;
 - **NHS cost saving of more than £24,500 per annum** due to reduced use of GP surgeries and a reduction in hospital stays;
 - Enhanced training to all new and existing staff;
- 6.76 Beyond the above, the document produced by the applicant details how the homes engage in Corporate Social Responsibility activities with money being raised for local charities and strong links being made with local schools in order to provide enhanced education and experience for local students.

7. CONCLUSION

- 7.1 As has been demonstrated throughout this Statement and the accompanying documentation, the proposal clearly falls within Class C2 of the Use Class Order due to the high level of 'end of life' and dementia care and facilities it offers residents.
- 7.2 The nursing home will provide future residents with their primary and permanent residential address. For this reason, the Council's assessment should not raise any objection on the grounds of loss of dwellinghouse accommodation and in considering the matters, officers must remain cognisant of the benefit streaming from the development in respect of 70 dwellings in the Borough potentially being vacated and re-occupied by families in need of such accommodation.
- 7.3 At present, there is an undersupply of specialist care accommodation for in the Borough and with demand in Bexley forecast to rise, supply must increase by 40%, compared to the national average of a 19%. Without this demand being met, vulnerable Borough residents in need of care have no option other than to remain living in their current properties, which are usually unsuitable and do not provide a safe residential environment. Such arrangements place further strain on District Nurses, GPs and local hospitals. By supporting the redevelopment of the site to provide a 70 bedroom nursing home, not only will 70 homes in the Borough be vacated for occupation by other Borough residents, the strain on NHS services will be alleviated and these are important material considerations.
- 7.4 A further matters attracting significant weight in this case is the applicant's offer to prioritise Borough residents when rooms are vacated. As set out above, the applicant will ensure that Borough residents will be given priority when rooms firstly come available. Only after this time if the rooms are not occupied with out of Borough residents be considered.
- 7.5 The development itself has been well designed, respecting the site, neighbouring properties and the wider context. Indeed, due to the high quality design and intention to invest in quality materials and landscaping, the development is considered to enhance the site's appearance and contribution to the street scene compared with the existing situation.
- 7.6 It is demonstrated above and in the Heritage Statement that the development will not give rise to any harmful impact on designated heritage assets in the area, including the entrance to Danson Park which adjoins the site's northern boundary.
- 7.7 The proposed nursing home would meet policy requirements regards energy efficiency and sustainability.
- 7.8 The proposed development meets all relevant parking standards and ensures that there is no harm to the safety or overall movement of traffic to and from the site. It has been demonstrated that safe access and egress will be provided to all vehicles, including emergency and refuse vehicles, and that they will be able to leave and enter the site in a forward gear.

- 7.9 Overall, the proposal will deliver a high quality nursing home, providing the optimum use of a site. The applicant has engaged with the Council at Pre-Application stage and responded to and addressed the advice given. As such, the development is considered to be policy compliant and as such the Council is respectfully requested to grant permission subject to any necessary safeguarding planning conditions.



Boyer

24 Southwark Bridge Road, London, SE1 9HF | 0203 268 2018
london@boyerplanning.co.uk | boyerplanning.co.uk